



CABINET

**IMMEDIATELY FOLLOWING JOINT CABINET AND EDUCATION,
SKILLS AND CULTURE SCRUTINY COMMITTEE ON
THURSDAY, 6 SEPTEMBER, 2018**

COUNCIL CHAMBER - PORT TALBOT CIVIC CENTRE

Part 1

1. Declarations of Interest
2. Strategic School Improvement Programme - Future of Secondary Education in the Upper Afan Valley (*Pages 3 - 402*)
Report of the Director of Education Leisure and Lifelong Learning
3. Urgent Items
Any urgent items (whether public or exempt) at the discretion of the Chairman pursuant to Statutory Instrument 2001 No.2290 (as amended)

S. Phillips
Chief Executive

Civic Centre
Port Talbot

Friday, 31 August 2018

Cabinet Board Members:

Councillors: R.G.Jones, A.J.Taylor, C.Clement-Williams,
D.W.Davies, D.Jones, E.V.Latham, A.R.Lockyer,
P.A.Rees, P.D.Richards and A.Wingrave

Notes:

- (1) *The views of the earlier Scrutiny Committee are to be taken into account in arriving at decisions (pre decision scrutiny process).*

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

CABINET

6th September 2018

DIRECTOR OF EDUCATION, LEISURE AND LIFELONG LEARNING

ALED EVANS

MATTER FOR DECISION

WARDS AFFECTED: Cymmer, Glyncorrwg, Gwynfi, Margam, Taibach,
Port Talbot, Bryn & Cwmafan, Pelenna

STRATEGIC SCHOOL IMPROVEMENT PROGRAMME – FUTURE OF SECONDARY EDUCATION IN THE UPPER AFAN VALLEY

Purpose of report

1. To obtain Cabinet approval to implement a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil, and to close Cymer Afan Comprehensive.

2. This Cabinet report needs to be read in conjunction with
 - Objection report (appendix A)
 - Consultation report (appendix B)
 - Consultation document (appendix C)
 - Cabinet report – June 2018 (appendix D)

- Education, Skills and Culture Cabinet Board report – November 2017 (appendix E)
 - Legal Implications (appendix F)
 - Statutory notice (appendix G)
 - Equality Impact Assessment (appendix H)
 - Risk Assessment (appendix I)
 - Community Impact Assessment (appendix J)
 - Welsh language impact assessment (appendix K)
3. Members should read the Cabinet report and appendices before taking a decision and must act in accordance with the legal provision set out in appendix F.

Executive summary

4. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. 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 in order to ensure future provision is sustainable.
5. Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive school as part of a federation of five schools comprising four primary and one secondary.
6. Cymer Afan Comprehensive is a small secondary school. A school with 600 pupils¹ or fewer is generally regarded as a small secondary school. Currently, Cymer Afan Comprehensive school has 229 pupils on roll. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status.

¹ Estyn 2013: 'School Size and Education Effectiveness'

7. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for approx. 640 pupils but with 229 pupils on roll² it is carrying over 64% surplus capacity.
8. In the current financial year³, Cymer Afan Comprehensive school receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average. This compares to £7,111⁴, per pupil during the previous financial year, approx. 60% above the average.
9. Cymer Afan Comprehensive school has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years.
10. There is suitable, alternative English-medium provision available within the County Borough at Ysgol Cwm Brombil, which offers a new build 21st century school, and at Cefn Saeson Comprehensive school. There is also suitable English-medium provision at Maesteg Comprehensive school.
11. The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Cwm Brombil, Margam, a £30m investment by the Council in a new build school with 21st century school facilities. The business case for the establishment of this school is not dependent on the closure of Cymer Afan Comprehensive school.

² School census – January 2018

³ School budget share allocation: 2018/2019

⁴ School budget share allocation: 2017/2018 as reported in the consultation document

12. At its meeting of 9th November 2017 the Council's Education, Skills and Culture Cabinet Board approved consultation on the future of secondary education in the upper Afan Valley.
13. The consultation document invited 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. This report was published on 15th May 2018.
14. At its meeting of 20th June 2018 Cabinet received a report on the outcome of consultation and having given it due consideration Members determined to proceed with the proposal, approving its statutory publication, a process that provides for the submission of objections. The period for submitting objections has now ended.
15. In total 433 written objections were received during the objection period. The majority of the comments contained in the objection correspondence repeat points that have already been addressed in detail in the Consultation Report. However, the objections must be conscientiously considered alongside the arguments in favour of the proposals and in light of the factors set out in sections 1.3 and 1.14 of the Code (see summary included in appendix F to this report).
16. Comments opposing the proposal do not, on balance, present a convincing argument suggesting its modification or abandonment. As such, the case for the proposal remains strong. Officers recommend that Members determine to adopt the proposal, with an implementation date of 1st September 2019.

Background

17. 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 21st 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 in order to ensure future provision is sustainable.

18. 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.

19. The Council has decided to review its provision on the basis of:
 - educational standards
 - the need for places and the accessibility of schools
 - the quality and suitability of school accommodation
 - effective financial management

The Proposal

20. It is proposed to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school, School Road, Cymmer, Port Talbot SA13 3EL to receive their secondary education at Ysgol Cwm Brombil, Bertha Road, Margam, Port

Talbot, SA13 2AN and to discontinue Cymer Afan Comprehensive school.

21. If approved the proposal will take effect on the 1st September 2019 with Cymer Afan Comprehensive school closing on 31st August 2019.
22. Ysgol Cwm Brombil is a new 3-16 'all-through', middle school, opening on 1st September 2018 in a new build facility in Margam, Port Talbot. Ysgol Cwm Brombil replaces the existing Dyffryn School and Groes Primary School which are both due to close on 31st August 2018.

Statutory Notice – decision to publish

23. At the Cabinet meeting of 20th June 2018 the outcome of consultation was considered. At that meeting, Members expressed concern for children with additional learning needs, but acknowledged that this was addressed in the circulated report. Officers highlighted that Dyffryn School (as proxy for Ysgol Cwm Brombil, yet to open) had a good record of supporting pupils with additional learning needs (ALN) and offered a wide range of support to pupils, the new Head Teacher at Ysgol Cwm Brombil also had a good understanding of pupil's well-being.
24. It was noted that a Community Impact Assessment (CIA) had been carried out prior to the consultation, this recognised that community based activities currently being carried out in Cymer Afan School, could be distributed to alternative locations across the upper Afan Valley.
25. Members highlighted that a new school outside the Afan Valley could open up new experiences and opportunities for children living

there, also specialist teaching may be available which pupils attending Cymer Afan may not have access to now.

26. Concerns were raised on the affect the closure of the school would have on the primary schools in the upper Afan Valley. Officers confirmed that currently there were no plans to close the any of the primary schools in the upper Afan Valley. Officers explained that if a visit was requested, there was an opportunity for parents to visit Ysgol Cwm Brombil.
27. Members explained that this was about educating children not about the building, the benefits of 21st century education was shown on para. 52, of the circulated report.
28. Members outlined there had been a long and extended consultation period lasting from 11 December 2017–14 February 2018.
29. Members highlighted that the work of the Neath Port Talbot Valleys' Task Force was a vision and was not funded, the Authority was unable to deliver all objectives with Welsh Government funding decreasing.
30. Members determined to proceed with the proposal and approved the statutory publication of the proposal. To this effect a statutory notice was published on 26th June 2018 allowing the 28 day period for submitting objections, which ran until 23rd July 2018.
31. The statutory notice is attached as appendix G

Objections to the proposal

32. In total 433 written objections were received during the objection period. These objections have been carefully considered by officers

and must be carefully considered by Members conscientiously and with an open mind, alongside the arguments in favour of the proposal and in light of the factors set out in section 1 of the School Organisation Code.

33. The objections can be categorised by type of objector as follows:

Table 1

Category	No.	Category	No.
Pupils	103	Residents/ Community	126
Parents/carers	86	Past pupils	23
Staff	15	Others/unspecified	20
Governors	2	Pupils' relatives	52

34. Objections were also received from:
- the upper Afan Valley federation of Schools Governing Body;
 - the Afan Valley Support and Action Group;
 - Cllr Scott Jones;
 - Cllr. Nicola Davies;
 - David Rees AM; and
 - Stephen Kinnock MP.
35. In addition a petition: 'Opposing the closure of Cymer Afan Comprehensive School' consisting of 2007 signatures has been received.
36. All written objections have been made available to Members as from Thursday, 16th August 2018 for perusal prior to the meeting of the Council's Cabinet on 6th September 2018 at which the proposal will be determined. Members will have also received, prior to that meeting, the Objection Report.

37. Two written further written objections were received after the closing date, 23rd July 2018. For reference, these have been included in the objections made available to Members.

38. The full Objection Report is attached as appendix A

Summary of objections received

39. Objections received relate to the following themes

Table 2

Education	Wider community
Transport and travel	Consultation process
Federation	Finance
21 st century school projects	Alternative organisation arrangements

40. The majority of the issues raised in the objection correspondence have been addressed in detail in the Consultation Report which should be read alongside this report.

41. The key objections are summarised below along with officer responses.

– Education

42. Objections received focus on the risk that pupils transferring from Cymer Afan Comprehensive to Ysgol Cwm Brombil will not continue to receive high standards of teaching or attain high outcomes. Additionally objectors fear that pupils with additional learning needs (ALN) will not be supported appropriately and that a larger school cohort would mean less care and attention for individuals, which is more important for pupils who reside in the upper Afan Valley due to high levels of deprivation experienced.

43. Officers do not believe that this proposal would be detrimental to standards or outcomes, but rather that this will significantly improve educational opportunities for upper Afan Valley pupils. Pupils at Dyffryn School (proxy for Ysgol Cwm Brombil) have consistently attained high standards at the end of key stage 4, the school has a good track record at supporting vulnerable pupils, including those with ALN and has demonstrated that the school offers a broad and balanced curriculum. With the addition of a new build 21st century school building in 2018 pupils will have the added benefits that this can offer, further enhancing and improving educational opportunities, including a wider range of support services and greater access to specialist staff.

44. The full commentary relating to objections received on the matter of education can be found on pages 5 – 16 of the Objection Report (appendix A).

– ***Federation***

45. Objectors are concerned that the four primary schools of the upper Afan Valley federation will be at risk if the secondary school closes as proposed, and that the current quality of transition experienced by pupils transferring from year 6 to year 7 will not be possible.

46. There are no plans currently to close any of the four primary schools, and while it is recognised that removing the secondary school will significantly alter the character of the current federation it is the view of officers that there is much to be gained from continuing with a federated arrangement with the primary schools in the upper Afan Valley.

47. Officers do not believe that transition between the upper Afan Valley primary schools and Ysgol Cwm Brombil should be any less effective than it is currently, with careful planning and organisation by the schools involved. It is the case that all secondary schools in Neath Port Talbot successfully manage transition with primary schools some of which may some distance away and there is nothing to suggest this wouldn't be the case in this instance.
48. The full commentary relating to objections received on the matter of federation can be found on pages 16– 19 of the Objection Report (appendix A).

– **Transport and Travel**

49. Objectors are concerned that the distance pupils will need to travel from the upper Afan Valley to Ysgol Cwm Brombil is too far, especially when weather conditions can be significantly different between the two areas. Concerns have also been raised relating to the possibility of pupils being able to access extra-curricular activities and being collected or brought to school after appointments or if taken ill at school.
50. There are no specified travel time or travel distance limits that determine the length of journey between home and school, and guidance issued in Wales relies on an assessment of reasonable journey time. The distance between Gwynfi, the furthest community in the upper Afan Valley from Margam, is approx. 13m miles with a journey time, including stops, of approx. 45 minutes. This journey distance and times are similar to other journeys undertaken by pupils across the county borough.
51. Arrangements for extra-curricular activities are not an uncommon challenge for schools that have pupils attending from outside the

immediate area of the school and schools ensure that all pupils have the opportunity to participate.

52. Concerns have been expressed about pupils missing the school bus. It is the responsibility of parents to ensure that pupils attend school, extra transport will not be provided for pupils who are late or who need to attend appointments made during the school day.
53. The full commentary relating to objections received on the matter of transport and travel can be found on pages 19 -25 of the Objection Report (appendix A).

– **21st Century School Projects**

54. Objections received have focussed on issues relating to the processes involved in establishing Ysgol Cwm Brombil and the perception that this proposal is necessary to address surplus places at the Margam school. Objectors have voiced the opinion that this proposal is predetermined as the Council needs to avoid 21st century funding clawback from Welsh Government and that if the process was fair and transparent then Cymer Afan Comprehensive school community would have been involved with the consultation for Ysgol Cwm Brombil from the outset.
55. It is the view of officers that the establishment of Ysgol Cwm Brombil does not have a direct impact on this proposal as Ysgol Cwm Brombil opens on 1st September 2018 and the new school building is nearing completion, regardless of the outcome of this proposal. Funding for this school is not dependent on the closure of Cymer Afan Comprehensive school and the transfer of pupils to Ysgol Cwm Brombil.
56. It is right and proper that the proposal on the future of secondary education should be considered in its own right, as should any

future proposals involving Ysgol Cwm Brombil. Should this proposal not be implemented then alternative proposals could be progressed, however it is the view of officers that this current proposal still presents the best available educational offer for upper Afan Valley pupils.

57. The full commentary relating to objections received on the matter of 21st century school projects can be found on pages 25 -31 of the Objection Report (appendix A).

– ***Wider Community***

58. Objections have been received which comment on the detrimental effect that this proposal will have on the wider community in the upper Afan Valley, and which raise concerns about the impact of losing education in such a deprived area. Objectors also state that the Community Impact Assessment (CIA) does not address wider issues of concern to the community.
59. This proposal relates to the secondary school and does not seek to remove education from the area as a whole. The four remaining schools are not currently under review and it is expected that they will remain federated and continue to benefit the communities where they are sited.
60. While children of secondary school age will be educated outside of the valley, under this proposal, it is still the case that they will return to their communities at the end of their school day and during holiday periods, and will be able to participate in community life in the same way as they do currently.
61. The CIA has been undertaken in the first instance for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently at the school

and has been prepared in line with the requirements of the Welsh Governments School Organisation Code. It is not a standalone document and the impact on the community has been considered at each stage of the process along with other assessments, officer reports and the outcomes of consultation. It is the case that the assessment of the impact on the community is not just contained in the initial CIA document but is reflected in other reports and documents, in response to comments and objections received throughout the process.

62. The full commentary relating to objections received on the matter of the wider community can be found on pages 31 -38 of the Objection Report (appendix A).

– ***Consultation Process***

63. A number of objections received relate to dissatisfaction with the consultation process, including the view that the consultation period was too brief, and that the comments received were not given due consideration or were ignored by Councillors.
64. The consultation period for this proposal exceeded the time requirement that consultees should have at least 42 days to respond to the consultation document. It is the view of officers that the high number of respondents demonstrate that there was sufficient time available to gather a wide range of views and opinions, however it is the case that the objection period has given consultees a further opportunity to respond if needed. With no new significant information coming forward it would not appear necessary to further extend the consultation or to delay the determination of the proposal.

65. It is not the case that consultation responses have not been considered or ignored. The consultation report has set out in some detail the views expressed by consultees and the officer responses. The objection report provides a further opportunity for Councillors to consider the objections to the proposal before determining the proposal.
66. The full commentary relating to objections received on the matter of the consultation process can be found on pages 38-44 of the Objection Report (appendix A).

– ***Finance***

67. Objectors have expressed the view that the higher levels of need experienced by Cymmer Afan Comprehensive pupils justifies the higher costs of educating them and challenge whether this proposal will result in a more equitable allocation of funds.
68. It is the case that the high costs of delivering education in Cymer Afan Comprehensive are not related to the levels of deprivation but to the need to provide basic education offer which all pupils are entitled to and receive across Neath Port Talbot.
69. The savings made from school reorganisation proposals are ring fenced to the Council's budget for education.
70. The full commentary relating to objections received on the matter of finance can be found on pages 44-47 of the Objection Report (appendix A).

– ***Alternative School Organisation***

71. Objections have been received which present the view that the community hub option was not properly assessed and should be reviewed further.
72. It is the case that the Consultation report contained information on all 13 options that were explored, including the community hub option. A community hub arrangement has to supplement the provision of a school in the first instance and as such the provision of a school was given priority in the evaluations of alternative options. The evidence presented demonstrates that the existing site areas of the upper Afan Valley schools are insufficient in size to accommodate the requirements of most of the proposed school configurations and the inclusion of a hub of services would require additional accommodation on site.
73. The full commentary relating to objections received on the matter of alternative school reorganisation can be found on pages 47-49 of the Objection Report (appendix A).
74. The Objection Report will be published on the Strategic School Improvement Programme webpage of the local authority's website by 13th September 2018. Hard copies will be available on request. Before the 13th September 2018, parents, carers and guardians and staff members of Cymer Afan Comprehensive school and the partner primary schools will be advised by the school of the link to the local authority's website whilst other statutory consultees will be e-mailed the link.

Consideration of the proposal

75. The proposal consulted upon and subsequently published seeks to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil, and to close Cymer Afan Comprehensive.
76. Although the case for maintaining Cymer Afan Comprehensive in the upper Afan Valley has been clearly voiced by those opposed to the proposal it is the opinion of officers that alternative options presented to the Council for consideration do not represent acceptable alternative models.
77. In addition, comments opposing the proposal do not, on balance, present a convincing argument suggesting its modification or abandonment.
78. As such, the case for the proposal remains strong. Officers recommend that members should determine to adopt the proposal, with an implementation date of 1st September 2019.

Pupil numbers and school accommodation capacity

– *Cymer Afan Comprehensive school*

79. There has been a 35% (122) fall in pupil numbers⁵ over the past ten years with a 2016 low of 210. Pupil numbers for this period are shown in table 3 below.

⁵ Pupil numbers updated to reflect the school census return - January 2018

Table 3

Cymer Afan Comp.										
Annual census - January										
Year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Pupil Nos	351	326	302	288	266	244	216	210	213	229

80. Forecasts based on January annual census returns suggest a potential increase of 42 pupils by 2024 (table 4). However, even then Cymer Afan Comprehensive will still be a small secondary school with numbers returning only to 2012/2013 equivalent levels.
- **Surplus capacity impact**
81. With the physical capacity to accommodate 641 pupils the school has a significant surplus capacity of c.64% (412 places). The forecasted pupil numbers at 2024 would still leave the school with c.58% surplus capacity and, notionally over half empty. This level of surplus capacity has revenue and capital costs associated with maintaining the school.
- **Ysgol Cwm Brombil**
82. Ysgol Cwm Brombil is a new, 21st century build, 3-16, 'all-through' middle school with capacity to provide for 1200 secondary age pupils. (It will also provide for 210 full-time primary age pupils, 45 nursery age pupils specifically from the catchment area currently served by Groes Primary school.) It is an English-medium community school which has room to accommodate pupils from the upper Afan Valley (table 4 below).
83. A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-esteem and well-being

of pupils and will aim to improve the learning outcomes for all children across the ability range.

Table 4

<i>The new school at Margam (secondary school capacity = 1200).</i>							
	<i>Annual Census January</i>	<i>January forecasts</i>					
Year	2018	2019	2020	2021	2022	2023	2024
Est. pupil numbers	783 (Dyffryn School)	835	865	845	845	854	845
Cymer Afan Comp.	n/a	n/a	268	273	264	262	271
Total:	n/a	835	1,133	1,118	1,109	1,116	1,116

Financial impact

84. The funding arrangements of the £30m new build investment at Ysgol Cwm Brombil is not dependent on this proposal.
85. Revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis, and that recurring revenue costs are both predictable and clearly expressed. The funding formulas for the primary and secondary sectors were revised in 2018 & 2011 respectively.
86. Revenue costs associated with maintaining a small secondary school are significantly higher than for those schools with greater pupil numbers. This is reflected in the high 'per pupil' funding at Cymer Afan Comprehensive school which is significantly higher than the average for the Council's schools (table 5). At Cymer Afan Comprehensive school this cost exceeds the average for the Council's secondary sector schools by nearly 55%.

Table 5

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Cymer Afan Comp.	£6,054	£6,325	£6,344	£6,861	£7,156	£7,156	£7,111	£6,822
Local Authority Average (inc. Cymer Afan Comp.)	£4,240	£4,384	£4,441	£4,438	£4,480	£4,484	£4,476	£4,418

87. The 'per pupil' costs at Ysgol Cwm Brombil, scheduled to open in 2018, will be at or below the Council's secondary sector average. Based on the average per pupil costs for 2018/2019 this proposal will deliver a potential 'per pupil' revenue saving of £2,404. With 229 pupils currently on roll, this is equivalent to c.£551k.
88. Ysgol Cwm Brombil will be funded according to the Council agreed formula for allocating school budget shares which will reflect the number of pupils on roll including additional pupils as a result of this proposal.
89. Revenue savings for reinvestment into the education budget will be as a result of efficiencies in terms of cost of delivery through economies of scale; Ysgol Cwm Brombil will be a large school. In this regard, the proposal supports the Council's effective management of its education budget and promotes the more equitable distribution of funding across local secondary sector schools.
90. There will be an additional recurring revenue cost of c.£76k associated with the provision of home to school travel. This figure has been estimated on the basis of all pupils transferring from Cymer Afan Comprehensive to Ysgol Cwm Brombil and provision at current transport prices.

91. Costs associated with compulsory redundancy will not be known until all redeployment opportunities have been fully explored. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council via an employers' pledge. The Council has a proven track record for supporting staff in such situations. However, in the highly unlikely event of the compulsory redundancy of all teaching and support staff currently employed at Cymer Afan Comprehensive school then, based on the current staff structure, the estimated total redundancy cost amounts to c.£458k. Redundancy costs incurred as a result of the closure of Cymer Afan Comprehensive school are 'one-off' payments and are not annually recurring charges.
92. Plans for a vacated Cymer Afan Comprehensive school site have not yet been developed. The school site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process. If the site or part of the site is sold the monies raised will be reinvested into the general education budget.
93. Additional commentary specific to finance can be found on pages: 18, 19 & 62 – 65 of the Consultation Report (appendix B).

Equality impact assessment

94. An Equality Impact Assessment (EIA) has been undertaken to assist the Council in discharging its legislative duties under the Equality Act 2010,
95. The EIA is attached as appendix H. The impact on protected groups, together with the three equality needs to which

Members must have regard are set out in the EIA and in annex F – legal implications. Members are directed to these documents before taking a decision.

96. The proposal seeks to reduce inequality of educational provision for pupils in the upper Afan Valley, ensuring that learning experiences are improved and that they are able to access the resources and facilities that would otherwise not be available to them.
97. The outcomes of the EIA do not find direct discrimination of a protected characteristic as the Council's proposal does not treat a person less favourably than it treats others. Indirect discrimination against females has been identified as the proposal will impact on female members of staff to a greater extent than it will on male members of staff. However, in implementing its proposal to close Cymer Afan Comprehensive school, the Council is pursuing a legitimate aim in improving the quality of education for pupils and securing more efficient use of public resources. In this regard, the proposal is a proportionate means of achieving that aim. Implementing the proposal will provide the pupils of the upper Afan Valley with a 21st century learning environment and increased learning opportunities. It will also enable the Council to make more effective use of its resources for investment in education. The conclusion of this assessment is that the proposal could be continued.
98. Separately, in response to the Well-being of Future Generations (Wales) Act 2015 the Council has set three strategic objectives which contribute to the seven national well-being goals that the Welsh Government requires all

public bodies in Wales to contribute to, in order to achieve ‘the Wales we want’.

99. The Council’s well-being objectives and the supporting improvement priorities are set out in the Council’s Corporate Plan. This proposal directly contributes to Well-being Objective 1 – ‘To improve the well-being of children and young people’, as it seeks to increase the opportunities for young people from the upper Afan Valley through delivering a 21st century learning environment, an environment that will provide pupils with a wider range of facilities and contribute to raising aspirations. It aims to ensure that pupils are equipped with the skills, the behaviours and the support they need to make progress and to contribute socially and economically to the national well-being goal of a prosperous Wales.

Workforce impacts

– ***School staff***

100. There are 23.6 full-time teaching staff and 39 support staff with contracts attached to Cymer Afan Comprehensive school. Pupil teacher ratio is higher than the average for the Council’s secondary sector schools (table 6) but this needs to be interpreted in the context of the arrangements across the federation.

Table 6

	2017
School	9.0
Local Authority	16.6
Wales	16.5

101. Should a decision be taken to close the school, staff with contracts attached to Cymer Afan Comprehensive school will be declared

redundant. Employees identified at risk of redundancy will be supported by the Council's policies and HR staff.

102. Employment for some may continue within the federation whilst there is also the potential for employment opportunities at the receiving school because of increased numbers.
103. The governing bodies of schools in Neath Port Talbot have pledged to employ redundant staff where possible.

– ***Centrally employed staff***

104. Centrally employed staff will be managed via the Council's staff employment processes.

– ***Staff support***

105. As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that as a result of school reorganisation some staff take the opportunity to undertake new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a proven track record for supporting staff in such situations.

Legal implications

106. Members are referred to Appendix F which sets out in detail the relevant legislation and legal implications relating to a decision on this proposal. It is the view of officers that this report complies with the legislative requirements.

107. The proposal is that Cymer Afan Comprehensive School should be discontinued. This proposal must be determined in accordance with the School Standards & Organisation (Wales) Act 2013 (the Act) and the School Organisation Code.
108. The Welsh Government's School Organisation Code imposes on the Council requirements and guidelines on matters relating to school organisation, including consultation.
109. Pupil travel arrangements will be in line with the requirements of the Learner Travel (Wales) Measure 2008; the Learner Travel Statutory Provision and Operational Guidance 2014; and the Council's Home to School Travel Policy 2017.
110. Revenue funding will be in line with the requirements of the School Funding (Wales) Regulations 2010; and the Council's approved formula for funding schools.
111. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.

Risk management

112. A risk assessment has been carried out under the Council's Risk Management Policy 2015.
113. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
114. Potential risk areas in implementing the proposal include:

- resistance to change leading to lack of pupil, parent and staff support
- educational standards not maintained
- loss of community facilities
- increased home to school travel time impacting on attendance and performance
- staff anxiety about job security
- negative impact on existing federation

115. Failing to implement the proposal will result in the following teaching/learning and financial benefits not being fully realised, particularly in relation to:

- providing a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils
- access to a wider range of staff expertise
- opportunities for wider peer group interaction
- a more efficient and effective use of resources, and savings from economies of scale
- greater protection against the impact of a schools funding formula review
- reduction in the number of surplus pupil places

116. The benefits of implementing the proposal will mitigate the effects of identified risks. A new school provides greater prospects for improving educational attainment for pupils.

117. The full risk assessment is attached to this report as appendix I.

Community impact assessment

118. The community impact assessment has been carried out in line with the requirements of the School Organisation Code. This is an assessment of the impact on community usage of those facilities and services currently available at Cymer Afan Comprehensive school. The assessment recognises the importance of Cymer Afan Comprehensive school and the part it plays in the wider community. Community provision and activities that have been developed over an extended period at the school site will be displaced under this proposal; however opportunities exist to relocate activity from the school to alternative locations. The assessment reports that these locations can be enhanced as appropriate with no loss of amenity to the wider community and recommends that plans are put in place to mitigate any loss.
119. Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.
120. Should this proposal be implemented then Ysgol Cwm Brombil will serve the upper Afan Valley and its facilities will be available for use by all the communities in its extended catchment area.
121. The community impact assessment document issued with the consultation document is attached to his report as appendix J. It should be noted, however, that the assessment of the proposal's impact on the community has been further informed by responses to consultation and during the objection period. Additional information arising from the consultation process (including statutory objections) is contained within the consultation report and the subsequent

Cabinet and Objection reports together with the respective appendices. As such, the community impact assessment document complements, and is complemented by, the reports and impact assessments to which this document has been attached/ electronically linked, including the objection report and associated Cabinet report and appendices. In this regard, that document needs to be read in conjunction with the accompany reports and impact assessments.

Welsh language impact assessment

122. Cymer Afan comprehensive school is an English-medium school as will be Ysgol Cwm Brombil. At English-medium schools Welsh is taught as a second language.
123. Officers are satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive school and that implementing the proposal should result in a positive impact on Welsh language development.
124. At Cymer Afan Comprehensive school the Welsh dimension is strongly supported. There are many valuable opportunities provided to develop pupils' knowledge and understanding of the history, culture and industry of Wales. All pupils follow an appropriate course in Welsh in key stage 4, and a majority of pupils gain a qualification in Welsh at GCSE.
125. Whereas Ysgol Cwm Brombil has yet to open, the experience at Dyffryn School serves as a helpful benchmark as the new school would wish to build on the strengths of existing provision. At Dyffryn School almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This was reported by Estyn to be strength of the

school, who also noted that the school has been effective in promoting positive attitudes to the learning of Welsh.

126. The school is working towards improving pupils' Welsh language skills beyond formal Welsh lessons, and to encourage greater pupil self-confidence when using the language. Pupils' understanding of Welsh culture is developed appropriately through subject topics and activities such as residential trips and the two school eisteddfodau.
127. Primary education through the medium of Welsh is available at Ysgol Gynradd Gymraeg Rhosafan, the Welsh-medium school serving the catchment area of the upper Afan Valley. Secondary Welsh-medium education will be available at Ysgol Gymraeg Ystalyfera –Bro Dur (Bro Dur campus) which opens in September 2018. Some pupils access Welsh-medium education at Ysgol Gynradd Gymraeg Cynwyd Sant and Ysgol Gyfun Gymraeg Llangynwyd in the neighbouring authority of Bridgend. Home to school transport is provided because of 'nearest suitable' provision criterion.
128. The full Welsh language assessment is attached to this report as appendix K.

Determining a proposal

129. In determining a proposal the Code sets out factors which should be taken into account. In this regards, Members are referred to paragraphs 15 -18 of the legal implications document (appendix F) and to the documentation accompanying this Cabinet report. Officers consider that the alternative provision at Ysgol Cwm Brombil will deliver outcomes and offer provision at least equivalent to that which is currently available at Cymer Afan Comprehensive school.

Detailed consideration of alternatives has been undertaken, none of which present as a viable option.

Recommendation

130. Having given due regard to the objections and the impact assessments in relation to equality, risk, community usage and Welsh language together with the legal implications, it is recommended that, in line with Section 53 of the School Standards and Organisation (Wales) Act 2013, Members determine to implement the proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at Ysgol Cwm Brombil and to close Cymer Afan Comprehensive.
131. The proposed date of implementation to be 1st September 2019.
132. The site and buildings be declared surplus to the operational requirements of the Education Leisure and Lifelong Learning Service.

Reasons for proposed decision

133. This decision is necessary to comply with the legislative requirements that provide for the implementation of the proposal.
134. A decision to implement the proposal will enable the Council to:
- promote high standards and the fulfilment of every child's potential; and
 - meet its duty to secure efficient education in its area.

Implementation of the decision

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

Appendices

Appendix A: Objection report

Appendix B: Consultation report

Appendix C: Consultation document

Appendix D: Cabinet report – June 2018

Appendix E: Education, Skills and Culture Cabinet Board report –
November 2017

Appendix F: Legal Implications

Appendix G: Statutory notice

Appendix H: Equality Impact Assessment

Appendix I: Risk Assessment

Appendix J: Community Impact Assessment

Appendix K: Welsh language impact assessment

List of background papers

a) Cabinet Report: June 2018

<https://democracy.npt.gov.uk/ieListDocuments.aspx?CId=158&MId=8497&Ver=4>

b) Education, Skills and Culture Cabinet Board Report: November 2017

<https://democracy.npt.gov.uk/ieListDocuments.aspx?CId=315&MId=7692&Ver=4>

c) Cabinet Report: February 2017

<https://democracy.npt.gov.uk/ieListDocuments.aspx?CId=158&MId=6586&Ver=4>

d) Cabinet Report: January 2017

<https://democracy.npt.gov.uk/documents/s27087/YNM%20CABINET%20REPORT%20040117.pdf>

e) Cabinet Report: October 2016

<https://democracy.npt.gov.uk/documents/s24985/YNMargam%20Cabinet%20report%200261016.pdf>

- f) Cabinet Report: July 2015
<https://democracy.npt.gov.uk/documents/s16179/CAB.%20090715%20Band%20A%20reconfiguration.pdf>
- g) Consultation Report: December 2016 (Ysgol Cwm Brombil)
<https://democracy.npt.gov.uk/documents/s27088/App%20A%20Consultation%20Report.pdf>
- h) Determination statement
<https://www.npt.gov.uk/media/7098/decisionletterynmargam.pdf>
- i) 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/$CAB-240908-REP-EL-KN.doc.pdf)
- j) Welsh Government - School Organisation Code: July 2013
<http://gov.wales/docs/dcells/publications/130719-school-organisation-codes-en.pdf>
- k) School Standards & Organisation (Wales) Act 2013
http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf
- l) Learner Travel (Wales) Measure: 2008 & the Learner Travel Statutory Provision and Operational Guidance: 2014.
http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf
<http://gov.wales/docs/det/publications/140616-ltog-en.pdf>
- m) Home to School Travel Policy: 2017
https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf
- n) Estyn
<https://www.estyn.gov.wales/inspection/search>
- o) School Funding (Wales) Regulations 2010
<http://www.legislation.gov.uk/wsi/2010/824/made>
- p) NPT CBC Funding Formula
<https://democracy.npt.gov.uk/documents/s34397/ESC%20Cab.Board%20report%20120118.pdf>
[https://democracy.npt.gov.uk/Data/Cabinet/20111109/Agenda/\\$CAB-091111-REP-EL.doc.pdf](https://democracy.npt.gov.uk/Data/Cabinet/20111109/Agenda/$CAB-091111-REP-EL.doc.pdf)
- q) Measuring the capacity of schools in Wales
<https://gov.wales/docs/dcells/publications/111104measuringcapacityen.pdf>
- r) Council Corporate Plan 2018-2022
<https://www.npt.gov.uk/media/8917/corporate-plan-2018-22-eng.pdf>

Officer Contact

Mr Andrew Thomas

Head of Transformation

Tel 01639 763314

Email a.d.thomas@npt.gov.uk

This page is intentionally left blank



Education, Leisure & Lifelong Learning Service
Strategic School Improvement Programme

**FUTURE OF SECONDARY EDUCATION IN THE
UPPER AFAN VALLEY**

OBJECTION REPORT



Contents

	Page
1. Introduction.....	3
2. Context.....	3
3. Objections.....	4
4. Summary of objections received.....	5
5. Education.....	5
6. Federation.....	16
7. Transport and travel.....	19
8. 21 st century school projects.....	25
9. Wider community.....	31
10. Consultation process.....	38
11. Finance.....	44
12. Alternative school organisation.....	47
Appendix.....	50

Response to objections to the Council's proposal on the future of secondary education in the upper Afan Valley

1. Introduction

This report addresses the principal issues raised in objection to the Council's proposal on the future of secondary education in the upper Afan Valley. It responds to the objections by means of clarification and commentary, with supporting reasons. The objection period commenced on 26th June 2018 and ended on 23rd July 2018. During this period a statutory notice was made available on the Council's website under the Strategic School Improvement Programme's webpage and displayed at the main entrance to the school. It was also made available to consultees listed in Appendix 1.

This report needs to be read alongside the associated consultation document¹, and the Consultation Report².

2. Context

The Council has consulted with interested parties on the future of secondary education in the upper Afan Valley. The Council proposes to close Cymer Afan Comprehensive school and to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil.

At the Cabinet meeting of 20th June 2018 the outcome of consultation was considered. Members carefully considered the consultation responses, and decided to proceed to the next stage

¹ Consultation document - <https://www.npt.gov.uk/1891>

² Consultation report - <https://www.npt.gov.uk/1891>

of publishing a statutory proposal. To this effect a statutory notice was published on 26th June 2018 allowing the 28 day period for submitting objections, which ran until 23rd July 2018.

If implemented, this proposal would take effect on 1st September 2019 with Cymer Afan Comprehensive school closing on 31st August 2019.

3. Objections

In total 433 written objections were received during the objection period. These objections have been carefully considered by officers and must be carefully considered by Members, alongside the arguments in favour of the proposal and in light of the factors set out in section 1 of the School Organisation Code

The objections are categorised by type of objector as follows:

Table 1

Category	No.	Category	No.
Pupils	103	Residents/ Community	126
Parents/carers	86	Past pupils	23
Staff	15	Others/unspecified	20
Governors	2	Pupils' relatives	52

Objections were also received from:

- the Upper Afan Valley federation of Schools Governing Body;
- the Afan Valley Support and Action Group;
- Cllr Scott Jones;
- Cllr. Nicola Davies;
- David Rees AM; and
- Stephen Kinnock MP.

In addition, a petition - 'Oppose the closure of Cymer Afan Comprehensive School' consisting of 2007 signatures has been received.

Two further written objections were received after the closing date, 23rd July 2018.

Copies of all written objections have been made available to Members for perusal prior to the meeting of the Council's Cabinet on 6th September 2018 at which the proposal will be determined. Members will have also received and considered, prior to that meeting, this Objection Report.

4. Summary of objections received

Objections received relate to the following themes:

Table 2

Education	Wider community
Transport and travel	Consultation process
Federation	Finance
21 st century school projects	Alternative school organisation

The majority of the issues raised in the objection correspondence have been addressed in detail in the Consultation Report which should be read alongside this report. The objections are summarised below along with officer responses

5. Education

- *Cymer Afan is consistently better than other schools in Neath Port Talbot and Wales so why should we send our children to an underperforming school elsewhere?*

- *Cymer Afan has superb educational outcomes and so it would be madness to close such a well performing school*
- *Cymer Afan is a caring school, a small school means our children get more attention and care*
- *ALN pupils would not be catered for in other schools, the POD is the only provision in NPT of its kind offering support and there will not be comparable support offered in Ysgol Cwm Brombil*
- *Cymer Afan pupils are the most vulnerable, most deprived pupils in NPT and should be treated more equitably*
- *Cymer Afan Comprehensive should not close as it serves a deprived community which needs education more than anywhere else, to educate and give children hope for the future*

Officer response:

References have been received to the position of Cymer Afan Comprehensive in the Wales Online ‘Real Schools Guide 2018’, stating that this guide indicates that the school is the highest performing school in Neath Port Talbot and that it would, therefore, be detrimental to pupils were it to close.

The Wales Online ‘Real Schools Guide 2018’, which is based on 2017 data, is a media produced guide created from information on schools which is publicly available. It is a journalist produced rating system based on 33 different measures, broken into four categories – attainment, teaching, attendance, and outcomes. Amongst the measures included are: the amount of funding that a school receives; the staff to pupil ratio; and the current exam results compared to 5 years previously. The guide also claims to measure: ‘whether a school is getting ‘top marks’ and ‘improving year on year’.

While the guide may provide interesting information, it is not recognised by Welsh Government or local authorities as being a reliable measure of pupil progress or of the performance of schools in Wales. In fact, there are a number of its measures which have little impact on the education provided by a school – for example the amount of reserves held by a school does not necessarily make any difference to pupil performance, similarly the number of teachers in a school is not a measure of the quality of teaching or of how teaching impacts on standards attained. GCSE results can be reported in a number of different ways and it isn't clear which measure the guide has used – for example it may have used the number of pupils who have achieved 5 A* - C grades GCSEs or the number of pupils who have achieved A – G grades at GCSE.

The guide's methodology is not used by Welsh Government or local authorities for measuring either school performance or pupil progress. Instead, a wide range of reliable information is gathered from a variety of sources including local and national data from tests, examinations and teacher assessments together with reports from Estyn and other recognised educational organisations. Additionally, local authority and regional Challenge Advisors visit schools regularly and report on progress in a consistent and comparable way.

The evidence used by educationalists points to Cymer Afan Comprehensive as not being the best performing school in Neath Port Talbot and its pupils do not attain the highest GCSE results when compared to other Neath Port Talbot schools.

In 2017, 41.5% of pupils in Cymer Afan Comprehensive and 60.9% of pupils in Dyffryn School³ attained 5 GCSE A* to C grades

³ Dyffryn School – used as the proxy benchmark school for Ysgol Cwm Brombil

including English and Maths. The average for Neath Port Talbot was 51% and for all of Wales 55%. The highest performing school in Neath Port Talbot attained 63%.

While it is acknowledged that Cymer Afan Comprehensive has made progress in recent years in terms of pupil attainment, when compared to the performance of other schools in Neath Port Talbot it is consistently at the lower end of the ranking (when comparing the percentage of pupils attaining 5 GCSE A* to C grades including English and Maths).

It has been noted that some correspondents believe that Cymer Afan Comprehensive should not be compared with the other secondary schools in Neath Port Talbot as the school has higher percentages of pupils eligible for free school meals (eFSM), and so pupils attending there have greater needs than those in other Neath Port Talbot schools. It would, therefore, appear to be more justifiable to compare the school using benchmark data which would mean comparisons would be made taking into account its free school meal percentages accordingly.

The table below (table 3) demonstrates that Cymer Afan Comprehensive has indeed the highest percentage of eFSM pupils at 31%, although this percentage represents a relatively small number -70 pupils. It can be argued that all of the Neath Port Talbot secondary schools have comparatively high levels of eFSM pupils with five of the nine secondary or middle schools placed in benchmark group 4 (over 20% and up to 30% eFSM) and benchmark group 5 (30% and above). The eFSM national average is 16.6%, and only three secondary or middle schools are below this percentage in Neath Port Talbot as shown in table 3.

Table 3

NPT Schools	Number of eFSM pupils	Total Number Pupils on roll	% eFSM Pupils	Benchmark Group (3yr average)
Cymer Afan Comp	70	229	31	5
Other	354	1207	29	5
Other	148	623	24	4
Other	163	736	22	4
Other	149	702	21	4
Other	150	783	19	3
Other	196	1271	15	3
Other	168	1117	15	3
Other	111	964	11	2

When Cymer Afan Comprehensive is compared to other Neath Port Talbot schools using benchmark data it is the lowest performing school with the average quartile place over the last 5 years being quartile 3. The highest performing school has an average quartile place of quartile 1, and all other schools average either quartile 1 or 2 over the last 5 years. In 2017 36% of pupils eligible for FSM (25 pupils) attained 5 GCSE A* to C grades including English and Maths, 5th out of the 9 secondary or middle schools in Neath Port Talbot. Dyffryn School had the greatest percentage of pupils at 44% (66 pupils).

Pupils at Dyffryn School, who will be transferring to Ysgol Cwm Brombil in September 2018, consistently attain good GCSE results, and there is nothing to suggest that Cymer Afan Comprehensive school pupils would not achieve at least the same standards should they transfer to Ysgol Cwm Brombil.

Attendance at Cymer Afan at 93.10% (2016-2017) is below the County average and places the school 7th out of the nine secondary and middle schools in Neath Port Talbot, with the highest percentage being 94.86%. Data for 2017/18 indicates that attendance has dropped to 92% and that Cymer Afan is positioned 8th out of 9 schools.

Cymer Afan Comprehensive School is placed in the yellow category of support, which indicates an effective school with good learner outcomes. Five of the seven secondary schools in Neath Port Talbot were categorised as green schools this year, and one of the two middle schools was also categorised as green. The green category indicates that a school requires the least amount of support to be effective.

No secondary or middle school in Neath Port Talbot is deemed to be unsatisfactory or in need of significant improvement. Four secondary schools have been inspected by Estyn between 2014 and 2017 and, of those schools, two were placed into the category of Estyn monitoring (Cymer Afan Comprehensive school being one of these), while the other two were found to have a number of areas of excellence. A school which requires monitoring needs to improve areas of its performance and Estyn review progress the following year. If during the return visit inspectors consider that insufficient progress has been made, then the school may be judged to require significant improvement or special measures and be placed in one of these statutory categories. In the case of Cymer Afan Comprehensive, Estyn were satisfied that progress had been made when they returned and the school was removed from monitoring. The local authority continue to closely monitor and support schools which have been in Estyn monitoring to ensure good progress is maintained.

Cymer Afan Comprehensive school has been recognised as providing a caring and nurturing environment. This is not the only school in Neath Port Talbot that this is true of – for example in the Estyn reports for the three secondary schools inspected during the same period as Cymer Afan Comprehensive school, care, support and guidance were deemed to be ‘excellent’ in two of them and ‘good’ in the third.

In moving from a small secondary school to a larger secondary school, some objectors have contended that pupils from Cymer Afan Comprehensive will be transferring into larger classes and that this will be to their detriment. Larger schools do not necessarily mean that pupils will be taught in large classes. Some of the larger schools in Neath Port Talbot have similar class sizes to Cymer Afan Comprehensive. Small class sizes have the biggest impact on progress of very young pupils, and the effect of a low adult to pupil ratio has very little impact by the time a pupil progresses to key stage 3, other than for those pupils with ALN. In secondary schools, greater pupil numbers can be a benefit as it can lead to broader and more balanced curriculum provision, and more opportunity for pupils to share the learning experiences with a larger peer group.

Attending a larger school does not mean that pupils are likely to have their needs unmet, or that they will receive less care and attention from staff. It is the case that larger schools create their own systems for ensuring that all pupils have a voice and are able to ask and receive support should it be required. In fact, larger schools are more often able to provide a wider range of support, achieved through economies of scale made possible due to greater pupil numbers.

Objectors to the proposal have expressed concerns over potential bullying in larger schools and the impact this will have on upper Afan Valley pupils who are presented as being 'different' to those living in more urban areas. These concerns were raised during the consultation and addressed in the Consultation Report (see section 8 of the Consultation Report). Given that research⁴ indicates that bullying is a concern for children of all ages it is appropriate that the response in the Consultation Report is repeated here. There are fears that Cymer Afan Comprehensive school pupils will be more likely to become victims of bullying in a school outside of the upper Afan Valley. In this regard it is important to restate that bullying is not tolerated in schools and school staff work hard to ensure that incidents of bullying are dealt with when it occurs, and that victims are properly supported. Respect and tolerance of diversity are promoted in schools and pupils who are experiencing bullying are encouraged to speak out in an effort to prevent further incidents. Research⁵ also indicates that there is as much as a 10% increase in pupils' awareness of bullying and of what steps can be taken to prevent bullying in larger schools (975 pupils or above) than smaller schools (258 pupils or below). There is also no firm evidence to suggest that bullies identify victims because of where they live, and it seems very unlikely that upper Afan Valley pupils will be victimised or bullied because of this, particularly in a school such as Ysgol Cwm Brombil which will have pupils from many different areas of Port Talbot. Once pupils start at Ysgol Cwm Brombil they will become pupils of that school and will be treated as such by staff and by peers. It is reported that at Dyffryn School there are few incidents of bullying or harassment and where these occur they are dealt with immediately in line with school policies. Additionally pupil

⁴ What Children are telling us about Bullying , ChildLine Bullying Report 2015/2016

⁵ A Survey into the Prevalence and Incidence of School Bullying in Wales, Welsh Assembly Government 2016

voice surveys report that 99% of pupils feel safe in school and value the secure environment that the school offers. Estyn also confirm that 99% of pupils in Dyffryn School reported that they feel safe in school when surveyed during inspection in 2016.

Comments have also been received relating to the management of pupils with additional learning needs (ALN) at Cymer Afan Comprehensive school and the perceived inability of other schools to support pupils as effectively. All schools are required to make provision for pupils with ALN and both Cymer Afan Comprehensive and Dyffryn School have ALN pupils within their classes. The support currently received by Cymer Afan Comprehensive school pupils is likely to be of at least the same standard if they transfer to Ysgol Cwm Brombil.

It is recognised that currently Cymer Afan Comprehensive school operates a support facility entitled Place of Development (POD) and that Estyn reported that the POD supports vulnerable pupils well and is of high quality. The POD provides intervention for groups of pupils with ALN including those who have difficulties with communication, social skills, behaviour, emotional needs and sensory/physical needs. Year 6 pupils are also able to have access for one morning a week.

The intervention programmes which take place in the POD are similar to those taking place in similar provisions in every secondary school in Neath Port Talbot, albeit under different titles in every school. For example, ELSA⁶ provision has been noted to be an intervention programme delivered by learning support assistants in the POD, and this is also known to be successfully delivered in Dyffryn School.

⁶ ELSA – Emotional Literacy Support Assistant

Neath Port Talbot and every local authority in Wales has a statutory duty to ensure that pupils with a statement of special educational needs (SEN) have their individual learning requirements fully met while at a mainstream school. All schools strive to ensure that every statemented pupil has their needs met and are no different to Cymer Afan Comprehensive in this respect. Ysgol Cwm Brombil has appointed a SENCO and an ALNCO to oversee the full range of needs that are likely to be present in the new school, and an area of the building has already been designated as a student services hub where all pupils will be able to access additional support appropriate to their needs.

Should this proposal be approved, it is expected that work will take place between Cymer Afan Comprehensive school and Ysgol Cwm Brombil to ensure that each pupil's statement or individual educational plan has been reviewed and appropriate provision has been identified and planned in order to meet individual needs. This will further ensure that procedures are in place to fully support pupils with additional learning needs.

Various teams exist in Neath Port Talbot Council to support and advise schools, parents and pupils themselves on all matters relating to additional learning needs (ALN). Specialist support is available for example for speech and language difficulties, ASD⁷, hearing impairment and learning difficulties. If this proposal is approved these teams would be available to support and assist pupils through the transition from Cymer Afan Comprehensive to Ysgol Cwm Brombil, as it is recognised that pupils with ALN can often find change difficult. Good communication and planning between the schools will also aid transition and enable pupils to

⁷ ASD – Autism Spectrum Disorder

feel more confident and at ease with the move, and local authority officers will endeavour to encourage and facilitate good relationships between the two schools for the sake of all the pupils involved. It should be noted that for those pupils who choose not to transfer to Ysgol Cwm Brombil support would still be available at other Neath Port Talbot schools. For pupils who transfer to schools outside of Neath Port Talbot, support may be more difficult to arrange as it would involve working with other local authorities with different ALN support systems.

It is acknowledged that Cymer Afan Comprehensive school serves one of the most deprived areas of Neath Port Talbot, as demonstrated in the Welsh Index of Multiple Deprivation (WIMD). WIMD is the Welsh Government's official measure of relative deprivation for small areas in Wales and aims to identify those small areas where there are the highest concentrations of several different types of deprivation.

WIMD is currently made up of eight separate types of deprivation – income, employment, health, education, access to services, community safety, physical environment and housing. Specifically for education, the WIMD is designed to reflect educational disadvantage within an area in terms of lack of qualifications and skills, using indicators which capture low attainment among children and young people and the lack of qualifications in adults.

Ensuring that aspects of educational deprivation are addressed is a key factor of this proposal and it is the view of officers that those pupils who transfer to Ysgol Cwm Brombil will have enhanced opportunities and experiences which will benefit them during their school years and beyond. This proposal seeks to improve educational experiences for pupils in the upper Afan valley by providing access to a 21st century learning environment, high

quality teaching and learning experiences (as demonstrated through Dyffryn School's consistently high pupil outcomes) and the opportunity to benefit from greater curriculum provision made possible in a larger school. This proposal also provides pupils from the upper Afan Valley with the opportunity to experience all the benefits that a new, modern school can bring to teaching and learning, ensuring that they have more advantages than many secondary pupils across Neath Port Talbot who are taught in ageing buildings in need of modernisation and repair.

Objectors have raised concerns over provision for pupils in Year 10 and 11 who will be sitting GCSE examinations at the time of the proposed move. This point was also raised during the consultation period and as stated then (see section 8 and appendix E of the Consultation Report), should there be a decision to implement the proposal to close Cymer Afan Comprehensive school then early discussions are required so that all involved can understand the curriculum implications and impact on pupils. Thorough planning and good communication between the two schools and support from local authority officers should alleviate these concerns and minimise disruption for pupils. Early discussions and planning will also help address pupils concerns and anxieties about transferring schools.

6. Federation

- *What will the future be for the remaining schools in the federation if the comprehensive is closed?*
- *We already have 3-16 education in the valley.*
- *Transition from primary to secondary has never been as easy as it is now – will pupils have this experience when they transition into Ysgol Cwm Brombil?*

Officer response:

Objectors expressed opposition to the proposal on the basis that it would undermine the federated arrangement that currently exists within the upper Afan Valley schools. As stated in previous reports (see section 9 of the Consultation Report, in particular) there is no reason for the primary schools to not continue with a federated approach. Currently, the Council has no plans to close any of the federated primary schools. The four remaining schools are able to continue to operate as a federation, benefiting from the advantages a federated arrangement can bring. This can be achieved with some amendment to the leadership arrangements and governance structure currently in place.

This proposal impacts on the federation specifically in relation to the secondary school element of that arrangement. It is recognised that removing the secondary school from the federation will significantly change the character and dynamics of the current arrangement and a different arrangement with the secondary school serving the area - Ysgol Cwm Brombil under this proposal, will need to be developed. However, a change to the current federation does not diminish the case for retaining a federated arrangement amongst the primary schools of the upper Afan Valley nor prevent a reconstituted federation from being formed.

Whereas, providing advice on how a primary federation should be organised are outside the scope of this report it is important to note that the federation of schools in the upper Afan Valley was formed to manage the impact of falling school rolls and the financial pressures that this has placed on each school, particularly in respect of ensuring that the curriculum needs of the pupils could be met. By federating and operating under the management of

one governing body, the budgets allocated to individual schools could be 'pooled' and resources directed to where needed most. It also provided the legislative framework to enable staffing structures to be changed in order to deliver education in a way that is more cost effective and efficient, the most recognisable change being the appointment of one head teacher across the five schools. The effect of this meant more resources for teaching and learning as all five schools are funded as though there was a head teacher employed at each school. The salary savings resulting from the single leadership structure allows the federated governing body to use its resources to best effect across the federation. This model of financial benefit will continue to be available to a federated governing body serving primary schools alone. Similarly, a single leadership structure serving the four primary schools is able to continue should the secondary school close. There is much to be gained by the four primary schools from a federated arrangement. In Wales schools are managed by governing bodies under a local management of schools scheme which gives governors the power to take decisions about how schools are run. Should a decision be taken to implement the proposal, with an intended closure date of 31st August 2019 there is time to make alternative arrangements for a federation of the primary schools.

Transition between key stages two and three is acknowledged to be a successful aspect of the upper Afan Valley federation and concerns have been expressed that this successful transition cannot be maintained if the pupils transfer to Ysgol Cwm Brombil. While it will require thorough planning - due to greater distances between the primary schools and Ysgol Cwm Brombil, it does not mean that transition cannot take place equally as well as current arrangements. Many schools across the County Borough have very good transition arrangements, even where there are distances

between the secondary and partner primary schools that make the arrangements more challenging.

If parents choose to send their children to schools other than Ysgol Cwm Brombil then transition work would be more of a challenge as the upper Afan Valley primary schools would need to work with a greater number of secondary schools.

Objectors contended that there was no benefit to be had by pupils from Cymer Afan Comprehensive school joining a 3-16 middle school in Margam as the federated arrangement in the upper Afan Valley already operated on 3-16 principles. It is acknowledged that school management and curriculum delivery across the upper Afan Valley schools is founded on a 3-16 model. However, that is not the basis of the Council's proposal for change which seeks to increase educational opportunities, remove the high cost of sustaining a small secondary school and deliver education more efficiently and effectively across the County Borough. The day to day running costs (revenue) at Cymer Afan Comprehensive are high compared to other secondary schools in the County Borough. The assessed cost of maintaining the school building (capital) compounds this financial situation.

7. Transport and travel

- *The journey is too far and will be exhausting for pupils*
- *There will be a negative impact on pupil health and well-being*
- *Pupils will not be able to access extracurricular activities*
- *Poor transport links between the upper Afan Valley and Margam will impact on school attendance if pupils miss the bus or need to attend medical appointments*

- *Lack of access to a car will mean that many families will be unable to attend school events or collect children who are taken ill at school.*
- *The roads are unsafe especially in winter, and this will impact on pupil attendance*
- *Margam is heavily congested at peak times*

Officer response:

The objections relating to transport and travel have been addressed in previous reports (see section 10 of the Consultation Report, in particular). However, given the prominence of this matter at both consultation and objection stages of the process, the initial response, which still stands, has been repeated here and added to as appropriate.

For pupils living in Neath Port Talbot, the Council is responsible for assessing the suitability of travel between home and school to enable pupils to attend school regularly. Free transport is provided for secondary age pupils living 3 miles or more from their nearest suitable school. In the case of the Council's proposal to provide education at Ysgol Cwm Brombil for pupils living in the upper Afan Valley, although not the nearest suitable school, free transport will be made available. Detailed information on travel assistance can be found in the Council's Home to School Travel Policy⁸.

The distance between Gwynfi, the furthest community in the upper Afan Valley from Margam, and Ysgol Cwm Brombil is approx. 13 miles with a journey time, including stops, of approx. 45 minutes. There are no specified travel time or travel distance limits that determine the length of journey between home and school. The

⁸ Home to School Travel Policy
https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf

guidance in Wales does not specify journey times and relies on an assessment of reasonable journey time.

An assessment of reasonable journey time or distance is one that takes into account the learner's age, ability and the locality of the pupil's home in relation to the available schools in the vicinity. A trial bus run between the upper Afan Valley and Margam has initially assessed the route as suitable.

There is very little evidence available to either support or disprove the notion that commuting can significantly affect children and young people's health and well-being. Discussions with pupils in various schools show that, for some, travelling to school by bus can lead to anxiety and stress, while for others the same journey can be an enjoyable and productive experience, where the opportunity to socialise with peers at the start and end of a school day is welcomed. An understanding that pupils are individuals who will react differently to the same situation will ensure that transition activities can be used to directly target support for those pupils who may initially be anxious and unhappy about travelling arrangements in an effort to alleviate their concerns.

Many schools, including all secondary schools in Neath Port Talbot, admit pupils from outside of the immediate vicinity of the school and very many children and young people are transported to school every day from all parts of the County Borough. These challenges are faced by schools on a daily basis and are appropriately and sensitively managed to suit the particular needs of the schools and the communities they serve.

Arrangements for extra-curricular activities are not an uncommon challenge for schools that have pupils attending from outside the immediate area of the school but, with effective management,

schools ensure that all pupils have the opportunity to participate. Ysgol Cwm Brombil will also seek to put in place the necessary arrangements to ensure equality of provision and experiences for all pupils, but those are management decisions that will be taken when the outcome of this proposal is known. The temporary governing body of Ysgol Cwm Brombil has stated that they will welcome pupils and parents of the upper Afan Valley as full members of the school community. In this respect they will be keen to ensure their responsibilities towards all pupils are met equally and similarly towards parents so that they are able to access meetings and events.

There are a range of solutions to this problem found by other schools that include: arrangements with public transport companies, using school minibuses, arranging activities at lunchtime or other times during the school day or facilitating car shares with parents. Extra transport for extra-curricular activities, or for other reasons, is not provided by the local authority, although some schools do make provision for this. It has been contended that extra-curricular activities organised during the school day will provide less time for pupils to socialise. In response it could be argued that participating in extra-curricular activities provides the opportunity to engage with others which supports socialisation.

The same active management arrangements will apply where pupils become unwell or need to leave school during the day. Contingency arrangements are made and schools manage the situation in the best and most appropriate way possible, always with the pupil's well-being foremost in mind.

It is noted that public transport between the upper Afan Valley and Margam is not direct and that this could cause difficulties for families without access to a vehicle. Families would not be

penalised for a pupil's late arrival at school where the delay has been caused by heavy traffic, road works or other unforeseen circumstances which causes authorised home to school transport to be late. Similarly, if a pupil is required to attend a medical appointment there will be no penalty. However, getting a child to school after a medical appointment will be the responsibility of the parent in the same way as it falls to the parent to make arrangements for transport to a hospital for an appointment. With regard to the use of detention, schools with pupils relying on school transport will manage behavioural issues in ways that do not place a pupil at risk of not returning home safely.

It is the responsibility of parents/carers to ensure that their child catches the school bus on time every day, as is the case for all other pupils in Neath Port Talbot using school or public transport, or to make other arrangements for their child to make his/her way to school. Elsewhere, where pupils are transported to school there has been no noted detrimental effect on punctuality or on attendance and there is no local evidence to suggest that pupils who travel to school by bus are more likely to have issues with attendance. Concern has been expressed that the Education Welfare Service will be diminished by this proposal. The Education Welfare Service is a central provision with officers based at secondary schools. It will be for the Council to ensure that, operating from Ysgol Cwm Brombil, the support for attendance provided by the Education Welfare Service in the upper Afan Valley is as effective as the current arrangements.

It is recognised that weather conditions in the upper Afan Valley can differ significantly from those occurring nearer the coastline and that during the winter months snow and ice can be more of an issue. There is nothing to suggest significant disruption of the bus services because of main highway conditions and an analysis of

school closure information due to inclement weather reveals that over the previous four winters, Cymer Afan Comprehensive School has been closed for snow on only three occasions and these were in January 2013. There have been some late starts because of weather conditions and this winter has seen further closures, although on 19th March (2018), when snowfall resulted in all schools in the upper Afan Valley closing, the main roads were open to vehicles and all local bus services operated as normal including all home to school routes from the upper Afan Valley to Maesteg, Neath and Port Talbot. The only services in the area that did not operate were those cancelled because of school closures in the upper Afan Valley.

During inclement weather, such as snowfall, it is the bus operator's decision, in conjunction with the Council and the school, as to whether or not school buses should run. Should there be concerns over pupil safety because of inclement weather or road conditions then decisions regarding transportation will be taken at the time the concerns arise and will involve good communication between transport managers, operators and the school. If a vehicle is not able to go any further on a route, the operator must contact the Council's Transport Unit and, depending on weather conditions, road conditions and weather forecast, a decision will be taken about how best to proceed and what action to take. These can range from waiting for the weather to pass over, the re-prioritising of the supply of 4x4 vehicles and gritting vehicles to clear roads, to requesting assistance from the emergency services. Until alternative arrangements are in place, pupils should remain with the vehicle. To the Council's knowledge no children attending schools in Neath Port Talbot have been left stranded at school due to adverse weather conditions and good communication between all parties is vital to ensure this doesn't happen in the future. While removing groups of children from school early could be disruptive

and mean that teaching time is lost, it is doubtful that this would impact significantly on pupil progress unless it were to happen on a regular basis, which is highly unlikely.

The road between Cymmer and Port Talbot is claimed by one objector to be a 'terrible road for accidents'. The personal injury accident data base (Stats19) shows that during 2016 there were 6 slight, 0 serious and 0 fatal personal injury collisions on the A4107 between Cymmer and Port Talbot. Two of these slight collisions occurred during times coinciding with possible travel times between home and school. This year the Council has received a Welsh Government Road Safety Grant to implement road safety measures to raise driver awareness and improve road safety along this route.

One objector has commented that Margam is heavily congested at peak times and the additional pupils from the upper Afan Valley will add to this congestion causing delays. A full transport assessment was undertaken and submitted as part of the planning application for the school and which required planning approval before it could be built.

8.21st century school projects

- *Neath Port Talbot Council have a vested interest in the closure of Cymer Afan Comprehensive and should not have been involved in decision making on its future.*
- *This proposal is being considered because Ysgol Cwm Brombil has been built too big and there is a need to fill surplus places.*
- *Parents from the upper Afan Valley will not send their children to Ysgol Cwm Brombil to rectify the Council's mistake in building the school bigger than it should be.*

- *Ysgol Cwm Brombil funding has been agreed on the certainty that Cymer Afan will close to enable surplus places to be filled.*
- *Members have to determine to close Cymer Afan Comprehensive to avoid clawback from Welsh Government for the Ysgol Cwm Brombil build.*
- *When submitting the business case for Ysgol Cwm Brombil the Council did not declare their intention to close Cymer Afan Comprehensive school.*
- *Cymer Afan Comprehensive school should have been involved in the consultation process to establish Ysgol Cwm Brombil – as they were not involved at that point, this current consultation is illegal.*
- *The Council continues to deny that extra surplus places have been created in Ysgol Cwm Brombil accommodate Cymer Afan pupils.*
- *A 21st century environment does not mean the school building – the environment will include the steel works and the M4*
- *Pollution in Margam will impact on health and well-being*
- *Why is it practical for the inclusion of Cymer Afan Comprehensive school pupils [at Ysgol Cwm Brombil] when it was deemed impractical for the inclusion of [two nearby primary schools] in terms of size and vehicular access?*

Officer response:

There are a number of objections to the proposal founded on misconceptions relating to the relationship between this proposal and the Council's successful bid for 21st century funding for Ysgol Cwm Brombil. These were raised at consultation stage and responded to in reports (see section 14 of the Consultation Report, in particular). They have been raised again by objectors.

To contextualise, in July 2015 a report was presented to Cabinet seeking permission to reconfigure the Council's 21st century schools Band A programme to omit the original 3-16 faith school project and replace it with a new build 11 -16 school to replace Dyffryn School. In October 2016 the project was further developed to include a 3-11 primary element and permission to consult on closing Dyffryn and Groes School and creating a new 3-16 all through middle school on the current Dyffryn upper school/Groes site was sought and subsequently granted.

The statutory processes were duly completed, with very few comments received from the two school stakeholder groups, and with no objections received the proposal was approved with an implementation date of September 2018. A tight deadline for completion of the build project was necessary to comply with the requirements of the Band A funding and as such the build project was being developed alongside the statutory procedures to establish the new school and application for funding. During this time an outline business case was submitted and approved and Welsh Government awarded funding for the scheme subject to the usual conditions of grant being met. One such condition relates to the clawback of up 25% of the funding granted where pupil projections for the school are not realised and there is consequent over capacity in the build. Other conditions also need to be met to ensure that the full funding is received, as is the case in every project of this kind.

At the time of developing the business case there were no plans to close Cymer Afan Comprehensive school. Any such plans would have required the formal school closure processes, including consultation with stakeholders that this current proposal is following. In addition, the financial case for funding the capital

build element of the new school is not dependent upon the closure of Cymer Afan Comprehensive school or the transfer of pupils from the upper Afan Valley to Ysgol Cwm Brombil.

It is the case that the opportunity to maximise of the development of an 'all-through' middle school at this site by providing for pupils additional to those currently on roll at Dyffryn School and Groes Primary was exploited.

While it is the view of some objectors that Cymer Afan Comprehensive school should have been involved in the proposal to establish Ysgol Cwm Brombil from the outset that position presumes that the only means of fully utilising pupil places at Ysgol Cwm Brombil relies on the closure of Cymer Afan Comprehensive school and the transfer of pupils to the Margam site. Whereas this presents as a possible course of action, it is not necessarily the only available course of action. This proposal, involving the closure of Cymer Afan Comprehensive school, is the one currently being consulted upon. Should this proposal fall, then alternative proposals will need to be considered and consulted upon accordingly. In relation to Cymer Afan Comprehensive school, a separate proposal has also made it possible to allow the consultation on the future of secondary education in the upper Afan Valley to be carried out thoroughly and to ensure that the considerable responses received were fully considered before any final decision is taken.

Furthermore, it is the view of officers that to have extended the scope of the Ysgol Cwm Brombil proposal by including alternative arrangements involving other schools, would likely have delayed the new build proceedings resulting in Ysgol Cwm Brombil not being completed within the required timescales of the Band A projects.

Documents relating to the new build Ysgol Cwm Brombil proposal have been available publicly throughout the statutory processes and beyond. Welsh Government made were aware that increased numbers would be realised through future planning of school places, including the processes needed to establish Ysgol Cwm Brombil which at the time the funding was awarded had not been completed.

It is still the case that an alternative proposal could be developed should this proposal not progress. However, it remains the view of officers that this current proposal still presents the best available educational offer for upper Afan Valley pupils.

Ysgol Cwm Brombil open on 1st September 2018, with the new school building will being occupied in October 2018. The consideration and final determination of the proposal to close Cymer Afan Comprehensive and to make arrangements for those pupils to transfer to Ysgol Cwm Brombil for their secondary education, will have no effect on the establishment of the new school or on the completion of the building work. In that respect it is no different to any other school closure proposal undertaken in Neath Port Talbot where a receiving school has been established prior to the closure implementation date. The proposal to establish Ysgol Cwm Brombil was separate to this proposal and should this not be progressed further then Ysgol Cwm Brombil will still exist as planned. It is right and proper that this proposal on the future of secondary education in the upper Afan Valley should be considered in its own right, as should any future proposals involving Ysgol Cwm Brombil.

Neath Port Talbot Council have the authority to determine school reorganisation proposals within the county. Each proposal is

considered separately and decisions are made after full consideration/deliberation of the information presented.

One objector challenged the Council's use of the term 21st century environment when referring to Ysgol Cwm Brombil, contending that a school building is not an environment and that such a reference should include mention of the M4 and the steel works which the objector contrasts with the 'beautiful Afan Valley'. Notwithstanding an alternative interpretation of that point of view, the definition of 'environment' equally and appropriately refers to the setting in which an activity is carried on, such as a 'learning environment'.

Concerns have been expressed at the perceived poor air quality in Port Talbot and Margam. These relate to a view held that attending a school near the M4 motorway and in the close vicinity of the steelworks will be detrimental to the health and well-being of pupils from the upper Afan Valley. This view will have been reinforced by recent media reports describing Port Talbot as "Britain's most polluted town". Such media claims follow the publication of a World Health Organisation (WHO) report that quoted figures to support this 'most polluted' view of the town - figures that the WHO now accepts are wrong. In contrast, the correct figure puts Port Talbot, despite being bisected by the M4 and hosting one of Europe's biggest steel mills on a par with, or cleaner than, many other towns and cities. The WHO has taken immediate steps to rectify the mistake on its website and database.

The WHO praises all cities that collect and disseminate information on outdoor air quality for their actions. Neath Port Talbot Council is active in monitoring its air quality and has a longstanding strategy and programme to manage this process. It regularly monitors and reports its local air quality measurements.

The most recent Air Quality Progress Report (July 2017) demonstrates good progress and no cause for concern in the Margam area. This will help to alleviate concerns that pupils will be at risk of suffering ill effects from air pollution if they attend Ysgol Cwm Brombil.

The planning assumptions for Ysgol Cwm Brombil form the basis of an objection particularly in relation to an assessment, undertaken at the formative planning stage, indicating that there is insufficient room on site to accommodate two catchment area primary schools. Ysgol Cwm Brombil is intended to accommodate 210 primary age pupils (plus nursery) and 1200 secondary age pupils. There will be sufficient space within the new school to accommodate secondary age pupils from the existing catchment area of Dyffryn School together with additional pupils from elsewhere, up to the intended capacity limit of 1200. There is insufficient capacity on site to accommodate the intended primary and secondary pupil rolls of 210 (plus nursery) and 1200 respectively together with additional primary school(s). The assessment in relation to additional primary school was intended to explore the maximum potential for a 3-16 provision. Ysgol Cwm Brombil is a 3-16 school, so should the number of secondary age pupils be less than the intended 1200 then, potentially, there could be room to accommodate additional primary school pupils. However, the capacity of the school and associated vehicular access management would remain substantively the same. Additional primary or secondary school pupils above this number would present both capacity and home to school travel challenges.

9. Wider Community

- *Removing education from the valley will have a devastating effect on the community*

- *The impact on local businesses has not been considered.*
- *The upper Afan Valley will become more deprived as much needed amenities are taken away from the area*
- *The Community Impact Assessment is unsatisfactory and has not been drawn up in line with Welsh Government guidance.*
- *There has been no consideration of the detrimental effect on house prices, local businesses and the sustainability of the area as a whole.*
- *Cymer Afan Comprehensive is a rural school.*
- *The closure of Cymer Afan Comprehensive will mean that the adults of the upper Afan Valley will lose an established centre for them to learn and engage with the Welsh language.*
- *The proposal directly prevents two specific actions contained in the ‘Our Valleys, Our Future’ delivery plan—PS4 ‘Use existing – and create new – community hubs, in which the NHS, social services, schools and job centres work together with the third sector to provide services for local communities’ and PS5 ‘Build on the Welsh Government’s 21st century schools programme to co-locate services and focus on the community use of school buildings. This will allow schools to be used in a more flexible way so they offer a wide range of public services outside school hours.’*

Officer response:

Objectors have contended that the proposal would result in a depopulation of the upper Afan Valley which would detrimentally impact on local businesses. The proposal consults on the closure of the secondary school. It does not seek to remove education as a whole from the area. Currently, there is a primary school in each of the four main villages - Cymmer, Croeserw, Glyncorrwg and

Abergwynfi/Blaengwynfi. There is no primary school in Abercregan, Dyffryn Rhondda or Cynonville. The four primary schools, which along with the secondary school make up the federation, are not currently under review and do not form part of this proposal. It is expected that these schools will remain federated and will continue to provide pupils and staff with the benefits of federation within the communities where they are sited.

If implemented, the proposal would provide secondary education outside the upper Afan Valley, which would mean pupils leaving their communities for the school day. Secondary school pupils attend school during school hours for 190 days of the year. Outside the school day, at weekends and during holiday periods they will be able to contribute to the life and economy of their local communities, as they do now. At present, there are pupils living in the areas affected by this proposal who currently attend schools outside their local communities. Traditionally this has been the case for children seeking Welsh-medium education, faith based education, specialist provision at special schools and units, and parental choice for an alternative school.

It should be noted also that consultees have proposed, as an alternative option to the closure of Cymer Afan Comprehensive school, a new build, single site, 3-16 school. If this option was deliverable it would result in the closure of at least three of the four existing primary schools. Not all objectors favoured the closure of existing primary schools even to achieve this aim. The options for a new build, single site, 3-16 school were explored in detail in the Consultation Report (see section 16 of the Consultation Report) and it was found that the existing site areas of upper Afan Valley schools are insufficient in size to accommodate a single site, 3-16 provision.

It is contended by one objector that residents of the upper Afan Valley are entitled to the same opportunities as others in the County Borough. The proposal seeks to reorganise secondary education provision for pupils living in the upper Afan Valley. It does not remove any entitlement or access to secondary education, rather it aims to provide an enhanced educational experience for the pupils at a location outside the upper Afan Valley. Relocating secondary education does not discriminate against the upper Afan Valley. There are other areas within the County Borough that do not have a secondary school within the community and where pupils have to travel to access secondary education.

A Community Impact Assessment (CIA) has been undertaken for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently available at the school. The CIA has been prepared in line with the requirements of the Welsh Government's School Organisation Code, and includes the necessary information suggested in Annex D of the Code. The Code states that "*The prime purpose of schools is the provision of education... Nevertheless, in some areas a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the provision of education*". The CIA clearly highlights facilities and services that are provided by the school and also suggests where these could be relocated to avoid loss to the community. The CIA document also contains a comprehensive assessment of the facilities and services elsewhere in the upper Afan Valley. The CIA supporting this proposal is not a free standing document; rather it complements, and is complemented by, a series of related documents; namely, the consultation document, the Consultation Report, the equality impact assessment, the Welsh language impact assessment, the risk assessment, the legal impact

assessment and, in this latest instance, the objection report. These are presented to the respective Council Committee as a coherent set of papers annexed to a report. The assessments are iterative, being updated and amended, as appropriate, in response to issues raised by the consultation process. In this regard, the format of this CIA does not in itself provide an opinion on the long term consequences of school closure on the local community as these matters are dealt with in appropriate details in the accompanying documentation of which the CIA is an integral part. The Code suggests that ideally an impact assessment should be included in consultation documents, which this Council has done. The scope of the Council's assessment of community impact is not limited by the initial CIA document. The assessment is responsive to the issues arising from the consultation process and subsequent objections; issues that are clearly set out in the reports and accompanying documentation.

As part of the consideration of the proposal's impact on the wider community, in the case of proposed closure, the Council should give special attention to:

- whether the establishment of multi-site schools might be considered as a means of retaining buildings, or the reasons for not pursuing this option
- whether alternatives to closure, such as clustering, collaboration or federation with other schools, might be considered (taking account of the scope for use of ICT links between school sites) or the reasons for not pursuing these as an alternative
- whether the possibilities of making fuller use of the existing buildings as a community or an educational resource could be explored
- the overall effect of a closure on the local community

- how parents' and pupils' engagement with the alternative school and any
- facilities it may offer could be supported

These issues are addressed in the documentation (see sections 13 & 16 of the Consultation Report which provides considerable detail on the views of stakeholders who fear greater impact on the wider community.)

One objector, raising concerns over the closure of rural schools, cited the statutory guidance issued by the Department of Education 'Opening and closing maintained school, Statutory guidance for proposers and decision makers' April 2016. This guidance relates specifically to proposals for establishment or discontinuation of schools in England. The relevant guidance for Wales is the 'School Organisation Code' July 2013. This document has been referenced throughout the development stages of the proposal. It has been referenced in the consultation document, with further references and associated electronic links contained in the Consultation Report and the respective Council's committee reports.

On the matter of rural schools, the School Organisation Code states that: "There is no presumption in favour or against the closure of any type of school. The prime purpose of schools is the provision of education and any case for closure should be robust and in the best interests of educational provision in the area. Nevertheless, in some areas, a school may also be the main focal point for community activity, and its closure could have implications beyond the issue of the provision of education. This may be a particular feature in rural areas if school buildings are used as a place to provide services to the local community." It further states

that when considering whether a closure is appropriate, special attention should be given to: “the overall effect of a closure on the local community (including the loss of school based facilities which are used by the local community), particularly in rural areas or those receiving funding as part of regeneration activity....” Cymer Afan Comprehensive school does not qualify as a rural school under the designations being proposed for inclusion in the revised School Organisation Code⁹ but, in any event, the educational advantages outweigh the disadvantages identified.

Officers would contend that the consultation on this proposal has been thorough and extensive, and that the impact issues that have been raised by the communities of the upper Afan Valley, have received detailed and robust consideration. Of course, the decision will fall to Members.

An objection has been received which states that the closure of the school will result in adults being unable to access Welsh language education. This activity has not been highlighted as a possible loss either during the consultation or when completing the CIA. However, it is the case that there are many other venues which could be suitable for this type of provision in the immediate area including the library and Cymer Afan Primary school. The closure of Cymer Afan Comprehensive would be very unlikely to hinder the development of the Welsh language in the area for adults, and through undertaking a Welsh Language Impact Assessment it is anticipated that transferring Cymer Afan Comprehensive school pupils to Ysgol Cwm Brombil will further enhance and develop their Welsh language skills.

⁹ Village in sparsest context./Other (hamlet or dispersed) in sparsest context/Other (hamlet or dispersed) in less sparse context

The Consultation Report sets out why the proposal does not hinder the key priorities of the Valleys Taskforce Strategy (see section 12 of the Consultation Report, in particular). Additionally, the proposal does not prevent PS4 or PS5 of the 'Our Valleys, Our Future' delivery plan from being implemented. Four primary schools will remain in the upper Afan Valley and one or all of these could be suitable for the further development of a community hub if necessary. The Council's Band B 21st century schools programme will indeed strive to ensure that new build schools can be used in a more community centred way, however this target does not suggest that every community should receive a new build school. Furthermore, it was highlighted at the Cabinet meeting of 20th June 2018 that the work of the Neath Port Talbot Valleys' Task Force was a vision and was not fully funded, as such the Council was unable to deliver all objectives with Welsh funding decreasing.

It should be noted that while the need to understand and mitigate the impact of a school closure proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should principally be one of securing the best educational offer for pupils.

10. Consultation process

- *The process has been rushed and not enough time has been allowed to explore alternative options*
- *No consideration has been given to the consultation responses*
- *The consultation process has ignored the objections made by parents, schools and local councillors*
- *Incorrect information and answers have been given*
- *The Consultation Report did not indicate how many of the 3137 respondents supported or opposed the proposal*

- *Nothing that was outlined at the public meetings have been taken into consideration*
- *The Councils approach to the proposal has been in breach of the requirements of the Well-being of Future Generations (Wales) Act.*
- *A child's rights impact assessment has not been undertaken and this is unacceptable.*

Officer response:

The School Organisation Code requires that the consultation document must be issued during the term time of the schools affected and that consultees must be given at least 42 days to respond to the document. The consultation period in this case ran from December 11th 2017 to 14th February 2018, with the period for consultation exceeding this requirement. During this period face to face meetings were held with key stakeholders and the consultation generated over 3000 written responses.

One objector complained that the meetings were not informative as the officers provided no helpful responses to the issues that were raised. Officers do not accept that assertion and the notes of the consultation meetings, as published in the Consultation Report, are evidence to the contrary.

A comprehensive 136 page Consultation Report was published on 15th May which contained a summary of the comments received along with officer responses. This report contained detailed responses to alternative proposals, and it is unlikely that a longer consultation period would have generated any new viable proposals, or that further consideration of the proposals suggested would have led to a different outcome. However, the 28 day objection period also allowed consultees to further submit their

views in the form of objections ensuring that any additional information, proposals or comments could be considered before a final determination is made.

Previous evaluations of consultations involving proposals to close a school have suggested that the longer the process takes the more stressful it can be for those directly involved, especially staff and pupils who can find themselves in a prolonged period of uncertainty about the future. This particular proposal has involved extending the statutory periods as set out in the School Organisation Code in an effort to provide consultees with as much time as possible to respond to the consultation. The number of written comments received would suggest that there was enough time available to gather the views of a large number of stakeholders and interested parties. While a further extension of the consultation period would be necessary should new information or a new viable proposal be submitted to allow for more detailed investigation or consideration, it is the view of officers that all suggestions and alternative proposals received have been fully explored and further time would not add to the matters for consideration. As such, and with no new information of significance coming forward, there would appear to be no good reason for further delay and an extension of the consultation period would lead to a longer period of uncertainty for those directly involved.

It is not the case that the consultation responses have not been considered or that comments and objections have been ignored. The Council holds the view that the purpose of consultation is to gain the opinion of stakeholders and others who have an interest in a proposal and, with this in mind, it ensures that all views and comments are taken into consideration and used to inform the decision making process.

The Consultation Report has set out in some detail the views of the consultees who responded and the officer responses to their comments. Many of the comments received have highlighted concerns that will need to be addressed should the proposal be implemented, one example being the issue of ensuring good transition arrangements for vulnerable pupils. This does not mean the proposal should be abandoned but rather that greater care should be taken to ensure that these pupils have their needs met if the proposal is progressed. This matter has been reported and has in turn been fully considered by Members when making their decision to publish the statutory notice. It is, therefore, not the case that these comments have been ignored or not taken into consideration.

All information provided by officers has been as accurate as possible and while objectors have commented that incorrect answers and information have been given, it is the case that specific detail of these suggested inaccuracies has not been provided, making it impossible, therefore, to clarify or address any errors, if these have indeed been made.

Objectors have commented that the Consultation Report did not indicate how many of the 3137 written responses received were in support or opposed the proposal. It should be noted that while this comment is correct, the report does emphasise that *'no particular weight is given to the number [of responses] received as it is the views expressed and issues raised which informed this Consultation Report.'*

However, for clarity it can be confirmed that while not all consultees clearly indicated that they opposed the proposal, it has been assumed that unless stated otherwise all respondents were

opposed to the proposal as a whole, or to certain elements of the proposal at least. In this regard all 3,137 could be considered as opposing the proposal with none positively supporting the proposal.

As stated in the Consultation Report a child's rights impact assessment (CRIA) has not been completed for this proposal as it is not required. In Wales, CRIAs have been in place for a number of years and, although not mandatory, are seen as a primary tool for delivering Ministerial duties on children's rights. While there may have been discussion within the National Assembly regarding the need to transfer these duties, it is a fact that at this present time those duties lie specifically with Welsh Ministers and is not required for this process.

Nevertheless, while a CRIA has not been completed, this consultation has appropriately taken into account and has had due regard for the United Nations Convention on the Rights of the Child, with the clear aim of making sure that the rights of children are duly protected which is a duty of elected Members and public bodies. The School Organisation Code requires that the Council makes suitable arrangements to consult with the pupils of any school which is affected by school organisation proposals and, where possible, children and young people who are likely to attend that school. All pupil consultations conducted as part of the Council's Strategic School Improvement Programme are conducted within the framework provided by the National Standards for Children and Young People's Participation in Wales and adhere to the principle that 'Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account' - Article 12: The United Nations Convention on the Rights of the Child.

Officers consider that this proposal is in the best interests of the children of the upper Afan Valley.

Full details of the consultation undertaken with children and young people as part of this proposal are documented in the Consultation Report (see section 14 & appendix E), and pupil versions of both the consultation document and report were produced.

It has been stated that this proposal is in breach of the requirements of the Well-being of Future Generations (Wales) Act 2015, specifically in relation to the impact of the closure on the local community. It is not clear why this is considered to be the case. Officers do not consider that the proposal would breach the Act as alleged, or at all. Neath Port Talbot Council produces a corporate plan which includes well-being objectives. The three well-being objectives enable the Council to maximise its contribution to the seven well-being goals that Welsh Ministers have set for the whole of Wales in their Well-being of Future Generations (Wales) Act 2015. The first of the three objectives specifically relates to children and young people - 'To improve the well-being of children and young people', and the plan sets out in detail how this objective contributes to the seven well-being goals. It is the view of officers that this proposal can enable the Council to meet many aspects of this objective including through providing equality of educational provision for pupils in the upper Afan Valley, to be able to experience the benefits of the technological investment made possible through the 21st century schools programme and to better equip children and young people with the skills, behaviours and support they need for the future. In this regard, the proposal supports the requirements of the Well-being of Future Generations (Wales) Act by enhancing the educational opportunities of pupils from the upper Afan Valley, increasing their skills and knowledge base to enable them to become, as adults,

more prosperous, more resilient, and more equal. By providing access to 21st century school facilities and by broadening social and cultural experiences the proposal contributes to healthier individuals and more cohesive communities.

The proposal does not seek to remove access to education for pupils from the upper Afan Valley, but to provide 21st century teaching and learning opportunities outside the Valley. The potential impact on job losses as a result of this proposal is acknowledged but, on balance, it could be contended that the benefit to 'future generations' outweighs this consideration. (see also section 14 of the Consultation Report)

11. Finance

- *It is claimed that this proposal is about education but it is clear it is about saving money*
- *The Council has not worked with the school to address budget concerns*
- *The 'price per pupil' should be focussed on the whole federation not just the secondary school*
- *The savings claimed in the report would not be given back to education*
- *NPT have pledged that any funding saved by closure will be redistributed so that the spend per pupil will be the same across NPT*
- *Cymer Afan pupils have higher levels of need which justifies the higher costs of educating them.*

Officer response:

On the matter of the relatively high cost of providing secondary education in the upper Afan Valley, one objector challenged the basis of associating the cost of Cymer Afan Comprehensive with

the Council's responsibility for ensuring best value of public funds in the delivery of education across the 20,000 children and young people within the County Borough. The issue of best value has two distinct, although interrelated, cost bases. The first relates to the capital element of schools; that is, the maintenance and repair costs of the buildings and the external areas, and the second to the revenue expenditure of schools which includes salaries, teaching materials and general running costs, such as heating, lighting and electricity. It is the latter that is more often referred to when discussing savings and, for ease of comparison, this is usually shown as a 'cost per pupil'. Substantively, this latter expenditure forms a school's allocated budget which is derived from a distribution of Council funding set aside for this purpose. Given that the money all schools receive from the Council is distributed from the same central fund, if one school receives a greater share 'per pupil' than the remaining schools then there is less available for the others. Conversely, if a school supported by high 'per pupil' costs receives the same as the remaining schools then the other schools have a more equitable share. For the reasons set out above, maintaining a small secondary school is not cost effective when there is room available at other schools that are accessible and have surplus capacity.

Objections have been received which query why the 'per pupil funding' hasn't been calculated using all the federation schools rather than just the secondary school. In a federation - and in a 3-16 middle school arrangement, the respective schools receive their funding allocation as separate primary/secondary schools. In Wales there is no bespoke formula for funding schools in a federation or in a 3-16 middle school arrangement. As such, the five schools in the upper Afan Valley federation receive funding as separate entities, i.e. as if they were not federated. The federated arrangement into which they have entered provides for one

governance arrangement across the five schools and allows the federated governing body to combine the five separate budgets and to re-allocate that funding as the governors feel appropriate. As stated in the Consultation Report (see section 15), averaging the 'per pupil' cost of the primary and secondary schools in the federation would not give a true reflection of the funding needs of Cymer Afan Comprehensive school pupils. It would also have the unintended consequence of over inflating the cost of providing primary education, bringing the value for money for the primary schools into question.

It is contended that the Council have not worked with the school to address budget concerns, however it is not clear what concerns are being referred to in this context. The school will have day to day management of their allocated budget and so will be aware of the high costs of running a small secondary school and the extra funding that has been allocated to them to support this. School budgets are determined, for the most part, by pupil numbers on roll, and the greatest costs are usually to provide staff. A reduction in staffing would reduce costs however it would likely mean that curriculum delivery would be severely compromised and may not meet statutory requirements, or that support for pupils with SEN would not be provided, again placing statutory duties at risk. It is therefore unlikely that the school could identify any meaningful savings, which highlights once more that maintaining a school with such a small number of pupils results in high costs.

Many objectors state that pupils at Cymer Afan deserve higher levels of funding due to the greater deprivation that exists in the upper Afan Valley. The high costs of delivering education in Cymer Afan are not related to the levels of deprivation but to the need to provide the basic education offer which all pupils are entitled to and receive across Neath Port Talbot. The higher level

of funding does not specifically support pupils identified as being from deprived areas, instead extra support for pupils from deprived areas is provided through other means including grants, such as the Pupil Development Grant which is allocated to schools based on the number of pupils eligible for free school meals (eFSM). This funding follows the individual child - for example an eFSM pupil transferring into Ysgol Cwm Brombil would mean that Ysgol Cwm Brombil would receive the grant funding applicable to that pupil and would, therefore, be able to provide appropriately funded support.

The savings made from school reorganisations are ring fenced to the Council's budget for education. School reorganisations resulting in financial efficiencies through economies of scale facilitate a more equitable distribution of funds resulting in school budget allocations having a more equal 'per pupil' funding base. Funding for specialist needs, such as SEN provision and pupil deprivation grant allocations, will continue to recognise and provide additional finance to schools in order to support areas of specific need. (see section 15 of the Consultation Document)

12. Alternative school organisation

- *The Consultation Report did not give an accurate assessment of the community hub option; this is something that should be explored further*
- *More time should be allowed to explore further options*

Officer response:

The principal focus of this proposal is the future of secondary education in the upper Afan Valley. During the consultation, it was requested that consideration be given to a range of options for alternative school organisation in the upper Afan Valley in order to

maintain secondary education provision there. These consisted of options that involved new school builds, the remodelling of existing premises and combinations of both, together with proposals for a hub of community services. In all, 13 options were explored. Each option has been individually assessed with detailed evaluations set out in the Consultation Report (see section 16 of the Consultation Report). For the sake of completeness, additional options for school organisation were also been considered. A community hub arrangement has to supplement the provision of a school. As such the need to ensure the provision of a school in the first instance was given priority in the evaluations. The evidence from the options assessed shows that the existing site areas of upper Afan Valley schools are insufficient in size to accommodate the requirements of most of the proposed school configurations. This situation has a direct impact on any plans to create a hub of services, particularly where additional accommodation onsite is sought. The accommodation and external area assessments have been based on building bulletin specifications which set out the basic accommodation requirements for a school. Whereas community use of school premises through the hire of facilities is encouraged and promoted, this has to be an additional usage and secondary to the needs of the school, as the principal users.

Accommodating community services located offsite in buildings adjacent to the school is beyond the scope of this consultation report's option assessment process. Concern has been raised that a partnership venture involving shared accommodation with the Health Authority has not been more fully explored. At the Cabinet meeting of 20th June 2018 it was stated that if the Health Board was thinking of improving health facilities in the upper Afan Valley, then it would be for the Health Board to come forward with a plan for delivering the necessary health facilities and providing the appropriate accommodation, not the Local Authority.

Furthermore, discussions have been held with NPTC Group regarding 14 -16 education and, whereas, it is possible to deliver the junior apprenticeship programme from a number of different locations, including the upper Afan Valley, there is no obvious substantive benefit to any host school in this approach.

Discussions have also been held with the Community Library and with Pen Y Cymoedd Wind Farm regarding access to the Wind Farm's Community Fund. Potential developments involving other services providers, including the private and voluntary sectors, require a longer planning and preparation cycle than allowed for in this consultation.

Given the constraints identified in the alternative options considered, a hub based on a primary school only model still presents greater opportunity in relation to meeting space and traffic requirements, and cost effectiveness and efficiency.

In respect of the proposal to close Cymer Afan Comprehensive school, officers contend that sufficient time for the consideration of alternative options has been allowed .

Consultees

Cymer Afan Comprehensive School, together with the other federated schools of the upper Afan Valley	Pupils Parents Federated school staff Federated governing body School community groups/users Local community
Other schools	NPT schools (incl. the temporary Governing Body of Ysgol Cwm Brombil) Maesteg School
Trade Unions	Regional Organisers
Secondary Head Teachers' Group Primary Head Teachers' Group	NAASH LLAN
NPT Schools Forum	
NPT Elected Members	All
Town/Community Council	Pelenna
AM for Aberafan AM for Neath	David Rees Jeremy Miles
Regional AMs (South Wales West)	Suzy Davies Bethan Jenkins Caroline Jones Dai Lloyd
MP for Aberafan MP for Neath	Stephen Kinnock Christina Rees
Bordering Authorities	Swansea Bridgend Carmarthenshire Powys Rhondda Cynon Taf
Faith school education authorities	The Diocese of Menevia The Diocese of Llandaff
Regional Education Consortium Estyn	ERW

Children & Young Person Partnership
(incl. Early Years Development and
Childcare)

Communities First Partnership

NPTC Group

Neath Port Talbot 14-19 Network

SEN Partners

Action for Children
Child & Adult Mental Health Services
(CAMHS)
Consultant Community Paediatrician
The Children's Centre NPT Hospital
(Physiotherapy)

NPTCBC Integrated Transport Unit

Police & Crime Commissioner

Alun Michael

WG Schools Management Division



This page is intentionally left blank



Education, Leisure & Lifelong Learning Service
Strategic School Improvement Programme

FUTURE OF SECONDARY EDUCATION IN THE UPPER AFAN VALLEY

CONSULTATION REPORT



Contents

	Page
1. Introduction.....	3
2. Context.....	3
3. Background.....	4
4. Consultation process.....	6
5. Consultation meetings.....	7
6. Consultation responses.....	8
7. Summary of comments received.....	10
8. Education.....	23
9. Federation.....	32
10. Transport and travel.....	34
11. 21 st century build projects.....	46
12. Building condition and size.....	50
13. Wider community.....	52
14. Consultation quality.....	56
15. Finance.....	62
16. Alternative school organisation.....	65
17. The next step.....	89
18. Appendices.....	90

Response to consultation on the future of secondary education in the upper Afan Valley - analysis and comments

1. Introduction

This consultation report summarises the issues raised by consultees during the consultation process. It responds to these by means of clarification and commentary, with supporting reasons. The issues arising from the consultations have been responded to under nine main themes: education; federation; transport; 21st century build projects; building condition and size; wider community; consultation quality; finance and alternative school organisation.

Many of the responses relate to pupil well-being, pupil safety and pupil welfare and to the benefits to pupils of receiving their secondary education in the upper Afan Valley. These issues are addressed within the main themes and include the views of the children & young people.

The view of Estyn, the schools' inspectorate, is included in this consultation report together with notes of meetings with key stakeholders.

This report needs to be read alongside the consultation document¹, 'The future of secondary education in the upper Afan Valley'

2. Context

The Council has consulted with interested parties on the future of secondary education in the upper Afan Valley. The proposal consulted upon seeks to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil. If implemented, this proposal would take effect on 1st September 2019 with Cymer Afan Comprehensive school closing on 31st August 2019.

¹ Consultation document - <https://www.npt.gov.uk/1891>

3. Background

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 21st 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.

Implementing the Council's 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.

The Council has determined to review its provision on the basis of:

- educational standards
- the need for places and the accessibility of schools
- the quality and suitability of school accommodation
- effective financial management

Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive school as part of a federation of five schools, four primary and one secondary.

Cymer Afan Comprehensive is a small secondary school² with 229³ pupils on roll. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for 641 pupils but with 229 pupils on roll it is carrying 64% surplus capacity.

² A school with 600 pupils or fewer is generally regarded as a small secondary school - Estyn 2013: 'School Size and Education Effectiveness'

³ School Census January 2018

At £7,111⁴, 'per pupil' funding at Cymer Afan Comprehensive school during the 2017/18 financial year was significantly higher (approx. 60%) than the average for the Council's schools; equal to c.£2,600 extra for each pupil or an additional c.£595k allocated to the schools budget share. The average for a secondary sector school in Neath Port Talbot was £4,476 whilst the lowest was £3,910. In the current financial year⁵, pupils at Cymer Afan Comprehensive school receive £6,822 per pupil compared to the average for other secondary schools of £4,245, a difference of £2,577 which remains approx. 60% above the average.

Cymer Afan Comprehensive school has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, with many of the building and mechanical elements nearing the end of their life span.

There will be suitable, alternative English-medium provision available at Ysgol Cwm Brombil, which will offer a new build 21st century school. There is also suitable English-medium provision at Cefn Saeson Comprehensive school and Maesteg Comprehensive school.

The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Cwm Brombil, a £30m investment by the Council in a new build school with 21st century school facilities.

Pupils' attainment and achievement improve in new build schools and improvements in the quality of buildings have a positive effect on the quality of teaching and staff morale, which in turn further impacts on pupil performance. Staff in new build schools in Neath Port Talbot confirm this view and report improvements in aspects such as pupil behaviour, attendance and wellbeing.

Where a Council proposes the closure of a school it is required to consult before taking a decision on whether or not to implement that proposal. Consultation on this proposal has shown high levels of support to retain secondary education in the upper Afan Valley.

⁴ School budget share allocation 2017/2018

⁵ School budget share allocation 2018.19

4. Consultation process

On 9th November 2017, the Council's Education, Skills and Culture Cabinet board determined to consult on the future of education in the upper Afan Valley. The consultation period ran from 11th December 2017 to 14th February 2018. A list of consultees is included at Appendix A. The consultation document⁶ was made available by e-mail to consultees, with the school managing distribution to parents and pupils. It was also available on the Council's website. Cymer Afan Comprehensive school agreed to place the document on the federated schools' websites. Hard copies were available on request.

A pupil version of the consultation document was also made available to the school to distribute as it felt appropriate.

The consultation document invited 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.

The proposal and the consultation report will be considered by elected Members of the Council and should it be agreed to proceed with the plans consulted upon then the next stage of the process will be to publish a statutory notice outlining the proposal. This would be published for a period of 28 days during which written objections may be submitted.

Where objections are received, an objection report will be published summarising the objections and the Council's response to those objections. Elected Members of the Council will consider the proposal in light of objections received when taking a decision as to whether or not the proposal is to be implemented.

⁶ Consultation document - <https://www.npt.gov.uk/media/8363/future-of-secondary-education-in-the-upper-afan-valley-consultation-document.pdf>

5. Consultation meetings

Although not a formal requirement, during the consultation period meetings were held with key stakeholder groups to hear, in person, their views on the Council's proposal. Meetings were held with:

School Staff (Federated Schools of the upper Afan Valley), 17th January 2018, 3.45 p.m. at Cymer Afan Comprehensive school. Notes of the comments made and officer responses given at the meeting are included at Appendix B.

Governing Body (Federated Schools of the upper Afan Valley), 17th January 2018, 5.30 p.m. at Cymer Afan Comprehensive school. Notes of the comments made and officer responses given at the meeting are included at Appendix C.

Parents/carers (Federated Schools of the upper Afan Valley), 18th January 2018, 5.00 p.m. at Cymer Afan Comprehensive school. Notes of the comments made and officer responses given at the meeting are included at Appendix D.

Pupils (Federated Schools of the upper Afan Valley), 26th January 2018, 9.00 a.m. at Cymer Afan Comprehensive school. Notes of the comments made and officer responses given at the meeting are included at Appendix E.

Temporary Governing Body, Ysgol Cwm Brombil, 29th January 2018, 5.15 p.m. at St David's Church Hall, Margam. Notes of the comments made and officer responses given at the meeting are included at Appendix F.

Communities of the upper Afan Valley, 5th February 2018, 6.00 p.m. at Cymer Afan Comprehensive. Notes of the comments made and officer responses are included at Appendix G.

It should be recognised that the notes of the meetings reflect the officers' understanding of the views expressed and, as such, may not wholly capture the substance of individual comments made and queries raised. In this

respect and to support the consultation process, at each meeting consultees were encouraged to submit their comments in writing.

6. Consultation Responses

Although a count of the responses is shown below, no particular weight is given to the number received as it is the views expressed and issues raised which informed this consultation report. A total of 3137 written responses were received.

Of these, a total of 943 pro forma comment forms were received; these are the forms provided with the consultation document. Table 1 below shows how the respondents using the pro forma identified themselves and the respective number of forms received. Many respondents submitted more than one comment form, some with different comments.

Table 1

Pupils	38	Residents	104
Parents/Carers	284	Past pupils	117
Staff	11	Others	103
Governors	6	Unspecified	59
Pupils' relatives	221		

In addition to the pro forma comment forms, 2194 letters were received.

1916 of these comprised multiple copies of 8 standardised letters, with many respondents signing each of the 8 standardised letters.

Table 2

Standardised letter No.1	27	Standardised letter No.5	359
Standardised letter No.2	361	Standardised letter No.6	361
Standardised letter No.3	357	Standardised letter No.7	74
Standardised letter No.4	363	Standardised letter No.8	14

278 comprised individual letters or emails. Table 3 and table 4 below shows how the respondents identified themselves and the respective number of hard copy letters/e-mails received

Table 3

Pupils	93	Pupils' relatives	12
Parents/Carers	39	Residents	42
Staff	30	Past pupils	25
Governors	6	Unspecified	16

15 individual letters were also received from the following respondents.

Table 4

Estyn	Trade Unions x 3 (NASUWT, Unison, National Education Union Cymru)
Upper Afan Valley Federation of Schools Governing Body	Cllr Scott Jones (x 2) and Cllr Ralph Thomas
Afan Federation Support and Action Group x3	Stephen Kinnock MP
Cymmer Afan Community Library	David Rees AM
Afan Valley Community Leisure	Bethan Jenkins AM

Copies of all written responses will be made available to Members prior to the meeting of the Council's Cabinet at which the proposal and consultation report will be considered.

The Council is aware of an online petition against the closure of Cymer Afan Comprehensive school which has in excess of 1500 signatures.

7. Summary of comments received

Comments received relate to the following themes

Table 5

Transport and travel	Community
Education	Consultation processes
Federation	Finance
21 st century school projects	Alternative organisation arrangements
Building and building conditions	

In order to reflect the sentiment and feelings expressed by respondents, extracts from the responses to the consultation are included below. These are a sample of the views expressed. Individual concerns and queries have been addressed either directly or indirectly in the officer response to each of the main themes arising from the consultation.

Education

- *“Cymer Afan is a special school that provides pupils with the most wonderful experiences.”*
- *“Why close a school that is the 6th best in Wales and better than all other schools in Neath Port Talbot?”*
- *“Where is the evidence that this is an opportunity to improve learning outcomes?”*
- *“Cymer Afan has a reputation for caring and nurturing pupils?”*
- *“As you are aware the local authority produce a Vulnerability Assessment Profile (VAP) on all pupils within Neath Port Talbot, points being given if pupils receive free school meals, are SEN, each time they move school etc. Cymer Afan Comprehensive score the highest out of all mainstream schools and are therefore according to LA data already the most vulnerable pupils in the whole of Neath Port Talbot. This rating will increase even further if the proposal to close the school goes ahead due to the additional school move. This again shows how our pupils will be disadvantaged, and this proposal is not in their best interest and wellbeing.”*

- *“ALN pupils are thriving in their surroundings of a main stream school. This would not be possible for them in Margam, it is only possible because of the excellent working relationship we have with each and every one of them.”*
- *“Why close a school that provides so much for the deprived, pupils with Emotional Social and Behavioural difficulties and SEN children?”*
- *“Is the standard of provision for SEN in Ysgol Cwm Brombil as good as that in Cymer Afan Comprehensive School? Will pupils have the same entitlement? Will they have the POD provision?”*
- *“Are you aware that we practice on a “person centred” approach in Wales, has this approach been taken here?”*
- *“Local Port Talbot pupils may not accept the upper Afan Valley pupils.”*
- *“How can you make sure pupils are safe in a school they don’t belong in?”*
- *“Why is there no cross county border co-operation, with the LEAs, to increase pupil numbers in Cymer Comprehensive?”*
- *“Research shows that small schools consistently outperform large ones.”*
- *“Estyn report that small schools are better in deprived areas.”*
- *“Will my child be more likely to be bullied in a larger school?”*
- *“The proposal to close the school also fails to consider the disruption to learners, particularly to those currently in Year 9.”*
- *“Can you ensure that the children will not be singled out or at a disadvantage where their work is concerned?”*
- *“What effect is the vertical curriculum going to have on pupils if they move to schools that don’t offer it?”*
- *“Longer distances to travel will lead to greater absenteeism - How can you ensure this will not have a detrimental impact on children’s education?”*
- *“Children in Cymer Afan Comprehensive have access to sporting facilities and swimming, will these activities cease in the new school?”*
- *“What will be put in place to ensure support staff are employed if the school closes?”*

Federation

- *“Expertise of the secondary school teachers would not be available for the primary pupils if the school closed so primary children would lose out under this proposal?”*
- *“The current (federation) model allows the staff to build successful relationships with pupils and their families”*

- *“Effective transition between key stage 2 and key stage 3 will be undermined and progress in raising standards will be impacted.”*
- *“What guarantees can you give that the primary schools will remain open?”*
- *“Why is the Council going against promises to keep the federation for 10 years?”*

Transport and travel

- *“The proposal to commute our children from their villages for up to 2 hours per day is completely unsatisfactory.”*
- *“Isn’t it the responsibility of the LEA to provide suitable educational provision for pupils within their own county at a reasonable travelling distance?”*
- *“What are the details of the trial run conducted by the Council which is claimed takes 45 minutes from the Afan Valley to Margam?”*
- *“How long will it be before parents are asked to contribute to the cost of transport?”*
- *“Has a full travel assessment taken place?”*
- *“What are the arrangements for buses at Ysgol Cwm Brombil?”*
- *“Will shelters be provided at each of the bus stops?”*
- *It is not the length of the journey which will be to the detriment of pupils but the time spent on the bus and the behaviour, well-being and safety concerns that entails.”*
- *“How can you ensure the safety of pupils?”*
- *“Will there be an adult escort on the bus?”*
- *“It is a fact that bullying will occur on buses and a longer journey will increase this. “*
- *“What if the bus breaks down on the way to/from school?”*
- *“What are the Council’s policies and procedures regarding the safety of a child on school transport if there are dangerous conditions?”*
- *“No account has been taken of the daily risks travelling the valley roads and motorway”*
- *“A majority of people in the Afan Valley either do not drive or do not have access to a car – how do they get their child to school if they miss the bus?”*
- *“What about proposed attendance fines?”*
- *“Most parents in the area don’t have spare cash lying around to ferry their children back and forth on the public bus (or extortionate taxi fares).”*

- *“It will take up to two hours to travel from the Afan Valley to Margam, via public transport following many connections that would be made during the journey.”*
- *“Pupils from Glyncoed, Croeserw and Abercregan will have to get three (public transport) buses if they miss the school bus.”*
- *“What will you do to ensure that every child from this valley will be safe if they miss a bus and can’t get home?”*
- *“How are pupils from the upper Afan Valley going to be able to take part in after school activities? Will extra buses be provided for this?”*
- *“How will children get to school if they have a medical appointment?”*
- *“How will parents/carers/grandparents get to school if a pupil needs to be collected early due to illness or accident?”*
- *“How can parents attend parents evening if they don’t drive? Would transport costs (for parents) be paid for by the school?”*
- *“What will happen when transport fails?”*
- *“What will happen to pupils if it snows – how will they get home from school?”*
- *“All valley pupils would need to rise much earlier each morning to travel such a distance.”*
- *“What are the loading times for each set of children?”*
- *“Are the children going to have to walk a fair distance to catch the bus at ungodly hour’s morning and night when it’s dark, bitterly cold and raining?”*
- *“How will children have time for a social life due to extra hours travelling?”*
- *“What will be done to support ALN pupils who cannot travel on buses due to their anxiety levels?”*
- *“Research has proven that lengthy commutes will have a negative impact on pupils’ health and well-being.”*
- *“What impact assessments were carried out on the effect of such considerable travel times on the well-being of children and families?”*
- *“What are the health implications for pupils travelling from upper Afan Valley to Margam daily?”*
- *“Travelling by bus rather than walking or cycling as the pupils do now will increase obesity which is against the Well-being of Future Generations Act.”*
- *“This proposal would remove the opportunity for pupils to walk or cycle to school, reducing their ability to lead healthy, active and safer lifestyles.”*
- *“Extra traffic will increase pollution.”*

- *“These (travel arrangements) are the responsibility of the school and the LEA (ref DofE – New Home school travel and transport guidance)”*

21st Century School Projects

- *“Why can’t Cymer have a new build school?”*
- *“Why should the children from the upper Afan Valley be treated any differently from any other child? Isn’t 2018 the year of equality?”*
- *“New buildings don’t produce better results”*
- *“What evidence is there that new schools have better outcomes?”*
- *“If pupil costs are so much higher for Cymer Afan than elsewhere in the local authority, why wasn’t this thought of sooner and a new build school located somewhere more central (for the Afan Valley and Margam), e.g. Cwmafan?”*
- *“Wouldn’t a merger between Cefn Saeson and Cymer Afan be a better option?”*
- *“Close Cefn Saeson and transport those pupils to our school?”*
- *“Have the local residents been made aware if the closure of Cymer Afan does go ahead that there would be an extra five buses travelling through the estate twice a day?”*
- *“Why was Ysgol Cwm Brombil built too large for the current catchment area?”*
- *“Who will fill the surplus places if not Cymer Afan pupils?”*
- *“What if pupil numbers fluctuate (in the valley) and there isn’t enough room for pupils in the new school?”*
- *“Why have other feeder schools of slightly smaller size (Eastern Primary and Coed Hirwaun Primary) been dismissed to join Ysgol Cwm Brombil instead of Cymer Afan Comprehensive?”*
- *“As parents from the Cymmer region will be in a minority at Margam, it will prove more difficult for them to be elected as members of the Governing Body and to champion the rights of valley pupils.”*
- *“You have not even tried to get funding from the Welsh Assembly for a new school, everyone else is having it so why can’t we?”*

Building and building condition

- *“How is the £3m figure for repairs at Cymer Afan calculated?”*
- *“Ysgol Cwm Brombil is costing £30 million so why is there such controversy over a £3million revamp for Cymer Afan?”*

- *“What are the reasons for Cefn Saeson being granted a new school build?”*
- *“Why hasn’t the council carried out essential repairs to Cymer Afan Comprehensive?”*
- *“Why is it only now that we are being made aware of such huge repair costs?”*
- *“What is the Valley Task Force money funding- why can’t it be used for the up keep of the building?”*
- *“Will there be a cost to maintain/secure the site should it close?”*
- *“What is the cost of demolishing the building?”*
- *“Claims that the school (Cymer Afan Comprehensive) has an extra 400 surplus places has been exaggerated by the Council to suit the needs of its agenda.”*

Wider Community

- *“Cymer Afan Comprehensive plays a key role in the life of the valley.”*
- *“And so the challenge of this consultation is to find an affordable solution which meets the educational needs of the pupils **and** wider interests of the communities of the upper Afan Valley.”*
- *“Who would buy a house in an area with no school?”*
- *“Cymer Afan Comprehensive is the biggest employer in the area – is it fair to take this away from us?”*
- *“What is going to happen to local businesses?”*
- *“Cymer Afan is a rural school and is protected from closure.”*
- *“Closure would mean isolating the upper Afan Valley from other parts of Neath Port Talbot... resulting in greater unemployment and deprivation.”*
- *“The community impact assessment is flawed in that it fails to examine the long term consequences of school closure on already deprived valley villages.”*
- *“By removing education from the valley NPTCBC would be signalling their abandonment of a vulnerable community.”*
- *“How does closing the school fit with the Valleys Taskforce Strategy?”*
- *“School closure at this time would undermine the £130million ‘Afan Valley Adventure Park’ proposals and make the area less attractive to developers Northern Power.”*
- *“Is the proposed closure because the (school) land has been sold to make way for the infrastructure of the development?”*

- *“Why can’t there be a reprieve to see how things develop with the proposed new leisure park at Cymmer and the possibility of the Rhondda Tunnel being reopened, both of which could act as catalysts to encourage new housing development and an increase in population?”*
- *“Are projected pupil figures taking into account a potential increase due to the resort?”*
- *“Why cannot the adventure park work alongside Cymer Afan Comprehensive School to provide local school leavers to apply for apprenticeships or jobs at the adventure park?”*
- *“Why has it not been proposed for the school to gain funding from the adventure park for its £3million repair bill?”*

Consultation quality

- *“The Council has been acting in bad faith in bringing forward proposals to Close Cymer Afan comprehensive”*
- *“Why has the consultation with parents and community been so short?”*
- *“The consultation concentrates on educational provision at the expense of a broader, more holistic approach which would consider the overall impact of any decisions taken not just on educational standards and costs but on the wider community as a whole.”*
- *“Have all necessary bodies received a copy of the consultation process/proposal?”*
- *“The consultation document is littered with profession terminology and jargon which is not readily understood by non-education professionals.”*
- *“The tone of the writing (within the Consultation Document) fails to uphold impartiality with greater positive emphasis laid upon, for example, the achievements of Dyffryn School and little mention made of those of Cymer Afan.”*
- *“Extra-curricular activities (for Cymer Afan Comprehensive) have not been mentioned in the consultation papers, whereas they have been for other schools.”*
- *“There are many failings in this consultation process where there hasn’t been sufficient information to enable an intelligent consideration and response.”*
- *“Have the Council taken careful consideration when making this proposal to the Child Poverty Strategy for Wales?”*

- *“Have the authority’s plans been submitted for assessment to the Future Generations and Well-being Commissioner’s office?”*
- *“Closing Cymer Afan Comprehensive does not align with the Well-being Future Generations Act 2015 and fails to consider the long term social and economic affect that closure will have on the upper Afan Valley.”*
- *“What is the local authority’s sustainable development plan for the upper Afan Valley?”*
- *“The council are being short sighted in their proposal to close Cymer Afan Comprehensive School and have not fully considered the facts and its impact, particularly in relation to the Single Integrated Plan 2013-2023.”*
- *“The proposal is in contradiction of Section 2 of NPTCBC Local Development Plan as the closure would increase the amount of Greenhouse gases being created within the constituency of Margam and Taibach.”*
- *“The fact that Margam school is being built with surplus places means that the Council has already a clear and vested interest in closing Cymmer Comprehensive and it cannot be seen as an impartial adjudicator on these matters”*
- *“Why were the Cymer Afan Comprehensive School community not consulted at the same time as Dyffryn and Groes schools”*
- *“It is clear that the Local Authority has already decided and indeed has received grant funding to build Ysgol Newydd Margam larger than that needed as a replacement for Dyffryn and Groes on the basis that the pupils of Cymer Afan School would become pupils of this school. This decision by officers was made in excess of 12months prior to this consultation exercise. Therefore this consultation does not meet the requirements of a legally defined consultation, whereby to be proper consultation must be undertaken at a time when proposals are still at a formative stage.”*
- *“Why was the consultation document not on the Neath Port Talbot council website consultation portal page?”*
- *“Why have the children’s rights not been taken into count – Article 12 (of the United Nations Convention on the Rights of the Child) has been breached.”*
- *“The young people’s version that has been produced is of poor quality – information has been left out.”*
- *“Has a child’s rights impact assessment been completed?”*

- *“Why didn’t the Council talk to the Federation beforehand with particular focus on budgets and surplus places? The Federation has not been given any opportunity to rectify the challenges it is facing.”*
- *“As this will be a school closure and not an amalgamation all staff will be made redundant. The consultation document made no reference to any safeguarding of salary in the event that any staff member is able to be redeployed.”*
- *“There are staff who hold contracts with the federation and work in both the primary and secondary schools – what will happen with their contracts and hours of work?”*

Finance

- *“Why is no money being invested in keeping education in the upper Afan Valley?”*
- *“I want confirmation that this is not just an exercise to reduce overall education expenditure.”*
- *“Why is cost more important to quality?”*
- *“How are the costs of educating pupils reached?”*
- *“Can you clarify as to why when calculating the average cost of a student at £7111 you failed to acknowledge its foundation status and therefore excluded the pupil costs of the federation Upper Afan Federation as this would have brought the average student cost to the average £4476 and not the £7111 as incorrectly reported in paragraph 6 (of the Consultation document?)”*
- *“Pupils in the Afan Valley do not receive equity from the Council as they have less services and opportunities; they are the most deprived in the county and should receive higher funding than other schools.”*
- *“Why aren’t the budgets of the schools being federated into one? Is not combining these just an excuse to close the school?”*
- *“Has the Council been granted funding based on forecasted pupil numbers from Cymer Afan Comprehensive School?”*
- *“Have you allowed for extra staff to support the additional members of Cymer Afan Comprehensive School (pupils) in existing school budgets?”*
- *“Has the actual cost of the new build, the cost of redundancies, the ongoing cost of transport been factored into the ‘average’ amount pupils attending the new Margam school will cost should Cymer Afan Comprehensive close?”*

- *“The transport costs have not included the extra costs of providing transport for pupils who stay after school?”*
- *“Would the cost of transport be better spent improving our existing school?”*
- *“Can consideration please be given for Upper Valley Federation to be given total autonomy financial and capital to continue to manage and maintain the schools of the Afan valley?”*
- *“Has the £2.5million rural and small schools grant been accessed for Cymer Afan Comprehensive?”*
- *“Have you looked to outside investment?”*
- *“Why can’t you use the money you’ve received from the wind farms?”*
- *“Why is the extra £13m that Neath Port Talbot Council receive more than other authorities for deprivation not being spent in the Afan Valley?”*
- *“Neath Port Talbot Council receives the fourth highest level of per capita funding from the Welsh Government 13 million more than the Welsh average – mainly driven by factors such as social and economic disadvantage. This money must be used to address the problems that gave rise to this relatively high level of funding. The fact that this is not happening is borne out by findings of the Social Mobility Commission that Neath Port Talbot CBC is the worst performing local council in Wales in addressing social mobility”*

Alternative school organisation

Consultees have requested that consideration be given to a range of options for alternative school organisation in the upper Afan Valley. These consisted of options that involved new school builds, the remodelling of existing premises and combinations of both, together with proposals for a hub of community services. It was also requested that consideration be given to 3-14 education with pupils transferring to other secondary schools for their 14-16 education.

Federated Governing Body The governing body of the Upper Afan Valley Federation of Schools has responded by requesting that the consultation process be stopped. They have set out the governor and community concerns and suggested alternative proposals together with a business plan of options. In their response they state that they strongly oppose the closure of Cymer Afan Comprehensive school and that the

governors and the wider community: “...have grave concerns for the pupils and the community as a whole...” Their concerns relate to safeguarding and well-being of pupils; educational standards of pupils and impact on primary phase education; transport; impact of leisure time; social exclusion / isolation and poverty; economic impact; and community impact and environmental issues.

The federated governing body offers 3 options as alternatives to the Council’s proposal. Firstly, the continuation of the current provision in the upper Afan Valley for a period of 3-5 years to allow the engagement of external organisations such the NHS, social services and library. Secondly, a new build 3-16 school as the base for a community hub of services involving education and a range of external organisations. Thirdly, a multi-site, 3-16 provision serving education together with a community hub of external organisations in refurbished but fewer buildings.

Trade Unions

Responses have been received from the National Education Union Cymru (NEU Cymru), Unison and NASUWT. The NEU Cymru have made the following comment:

“The proposal states that the pupils will transfer to the new school at Margam. This may lead to additional staff being required but no ring fencing is being offered to the staff employed at Cymer Afan Comprehensive School. If any of the displaced staff do get a job in the new school at Margam and are currently on Leadership or hold a TLR, they are unlikely to obtain a position at a similar level as the staffing structure for the new school in respect of Leadership and TLR positions will already be in place. This could adversely affect career prospects. Whilst the authority will seek to re-deploy staff realistically there are not going to be enough vacancies for all the staff currently employed at the school. The well-being of all the staff is currently being adversely affected with many facing the prospect of no job within 18 months.”

NASUWT seeks assurances that there will be no compulsory redundancies of the 26 teaching staff at Cymer Afan Comprehensive school. They also highlight the fact that secondary staff already teach in the primary schools in the federation which makes them more cost effective and include a suggestion to make Welsh language provision available at Cymer Afan Comprehensive school in addition to the current English language provision.

Unison raise similar concerns and note that Option 3 in the consultation document is considered to be its preferred option, i.e. build a new 'all through' middle school to replace the existing secondary and four primary schools.

Community Organisations

Responses were received from Afan Valley Community Leisure and Cymmer Afan Community Library, both of which raise issues relating directly to their organisations.

The Afan Valley Community Leisure are concerned that there will be a decline in the usage of the Afan Valley Swimming Pool due to extra school and transport hours involved in travelling from the upper Afan Valley to Margam, and predict that this will lead to a drop off in major income generating activities such as swimming lessons and membership of the swimming club. The respondent is concerned that this could have a serious adverse effect on overall financial stability and will place the future of the pool at risk once again.

The Cymmer Afan Community Library comments that a close relationship has been built up with the federated schools and that children regularly visit the library during and after school hours. Concerns are expressed that the additional travelling time will prevent children having the opportunity to use the library as much as they do now.

The Trustees of the library support the option of building a new school in the area modelled on a community hub so as to provide an opportunity to develop a new cohesive approach to the delivery of services in the valley.

Estyn

It is Estyn's view that overall the proposal is likely to at least maintain the standards of education and provision in the area. In addition, Estyn comments that the proposal asserts reasonably that Cymer Afan Comprehensive School is a small school and is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils.

Estyn considers that appropriate reference is made to the outcomes of the school's most recent Estyn inspection in April 2015 in which it is identified that

both the current performance and the prospects for improvement were judged to be adequate and that in November 2016 the school was judged to have made good progress in respect of the key issues for action.

The full response is included as Appendix H.

Local elected Members, AMs and MP

Responses have been received from the local members for the area together with the Assembly Members and the Member of Parliament.

Comments include:

“Cymer Afan offers a level of educational ‘added value’ which will not be readily replicated elsewhere.”

“The location of Glyncoed, Gwynfi, Cymmer and Croeserw, at the top of the Afan Valley, puts the communities at a disadvantage with poor transport and infrastructure links.”

“The Council’s proposal to remove secondary school provision from the Upper Afan Valley is unpalatable for many, but also leaves many questions over the future of the four primary schools, who are also part of the federation.”

“The valley has already experienced considerable population decline over many decades, this proposal would do nothing to halt or reverse this trend”

“The impact of the journey time upon the well-being of the children and their ability to fully function both at school and at home must be considered.”

“It appears that in this case the financial issues are driving the proposal rather than the standard of education received by pupils at Cymer Afan Comprehensive School.”

Officer responses to comments

Sections 8 -16 below set out the officer responses to comments received during consultation.

8. Education

A number of respondents made reference to Cymer Afan Comprehensive been ranked 6th in the Wales Online 'Real Schools Guide 2017', stating that this ranking indicates that it is the highest performing school in Neath Port Talbot and that it would, therefore, be detrimental to pupils were it to close.

The Wales Online 'Real Schools Guide 2017', which is based on 2016 data, is a media produced guide created from publicly available information on schools. It ranks schools using a system devised by journalists. It focuses on four key areas: attainment, teaching, attendance, and finance – which claim to give parents: 'a better idea of which schools will help their child prosper, no matter what their background may be'. It also claims to factor in aspects such as pupil progress, budget share per pupil and the ratio of teachers to pupils.

While the guide may provide interesting information on Welsh schools, it is not recognised by Welsh Government or local authorities as being a reliable measure for school performance. Welsh Government annually produce 'All Wales Core Data' sets which consistently report on the outcomes attained by pupils at the end of each key stage and which compare similar schools, known as the 'family' of schools, as well as all schools throughout Wales. This data is recognised to give an accurate picture of a school's performance over time and is the most widely used data set in this authority and others, and the inspectorate, Estyn.

However, it is recognised that data alone does not give a full picture of school performance. Information is also gathered from Challenge Advisors who regularly provide support and challenge for local schools through Core Visits, which can involve a range of evaluative activities including scrutiny of pupil work, lesson observations, listening to learners, training sessions for staff and governors, and formal meetings to discuss aspects of school performance. This provides the Local Authority with wide ranging information about each school and ensures that all schools throughout this County Borough and across Wales are being judged fairly and equally on matters that have the

most impact on pupil progress and attainment. The Neath Port Talbot Challenge Advisor team is part of a wider ERW service which covers Swansea, Carmarthenshire, Powys, Ceredigion and Pembroke and which ensures that standards are consistent across the region and that good practice is shared and developed.

Wales also operates the National School Categorisation System which, in partnership with local authorities and regional consortia, promotes and encourages a collaborative improvement system which enables schools to identify factors which contribute to their progress and achievement. This system is a three step model which not only relies on performance data but also examines the quality of leadership and teaching and learning within a school. From the information gathered a school is then placed within a colour coded category, which indicates the level of support that will be provided to the school during the academic year.

In 2017, 41.5% of pupils in Cymer Afan Comprehensive and 60.9% of pupils in Dyffryn attained 5 GCSE A*to C grades including English and Maths. The average for Neath Port Talbot was 51% and for all of Wales 55%. The highest performing school in Neath Port Talbot attained 63%.

In 2016, which is the year referenced in the Wales Online guide, 58.8% of Cymer Afan Comprehensive school pupils and 74.6% of Dyffryn School pupils attained 5 GCSE A*to C grades including English and Maths. Dyffryn School was the highest performing school in Neath Port Talbot in 2016, whilst Cymer Afan Comprehensive school was one of the lowest performing.

Dyffryn School has been categorised as being in the green support category for 2017 -2018, indicating that it is a highly effective school with a track record in sustaining a high level of learner outcomes. Cymer Afan Comprehensive School is placed in the yellow category of support, which indicates an effective school with good learner outcomes. 5 of the 7 secondary schools in Neath Port Talbot were categorised as green schools this year, and one of the two 'all-through' middle schools was also categorised as green.

The consultation document clearly states that this proposal is not being brought forward because Cymer Afan Comprehensive school is performing poorly or failing pupils, and the progress of the school in improving pupil

attainment in recent years is recognised. However the document also notes that pupils at Dyffryn School consistently attain good GCSE results, and there is nothing to suggest that Cymer Afan Comprehensive school pupils would not achieve at least the same standards should they transfer to Ysgol Cwm Brombil.

No secondary or 'all-through' middle school in Neath Port Talbot is deemed to be unsatisfactory or in need of significant improvement. Four secondary schools have been inspected by Estyn between 2014 and 2017 and, of those schools, two were placed into the category of Estyn monitoring (Cymer Afan Comprehensive school being one of these), while the other two were found to have a number of areas of excellence. A school which requires monitoring needs to improve areas of its performance and Estyn review progress the following year. If during the return visit inspectors consider that insufficient progress has been made, then the school may be judged to require significant improvement or special measures and be placed in one of these statutory categories. In the case of Cymer Afan Comprehensive, Estyn were satisfied that progress had been made when they returned and the school was removed from monitoring. The local authority continue to closely monitor and support schools which have been in Estyn monitoring to ensure good progress is maintained.

Cymer Afan Comprehensive school has been recognised as providing a caring and nurturing environment. This is not the only school in Neath Port Talbot that this is true of – for example in the Estyn reports for the 3 secondary schools inspected during the same period as Cymer Afan Comprehensive school, care, support and guidance were deemed to be 'excellent' in 2 of them and 'good' in the third.

Comments have also been received relating to the management of pupils with additional learning needs (ALN) at Cymer Afan Comprehensive school and the perceived inability of other schools to support pupils effectively. All schools are required to make provision for pupils with ALN and both Cymer Afan Comprehensive and Dyffryn School have ALN pupils within their classes. The support currently received by Cymer Afan Comprehensive school pupils is likely to be of at least the same standard if they transfer to Ysgol Cwm Brombil.

In Dyffryn School almost 200 pupils (24%) have been identified as having ALN and a range of support programmes are in place to meet their needs. However the school has identified that many of these pupils lack resilience and are not consistently able to apply themselves to every lesson, every day. As a result the school has introduced a range of strategies across the school to better promote pupil well-being and resilience. Additionally the school continues to make use of the School Based Counsellor and other specialist services which have all had positive effects on pupils.

Cymer Afan Comprehensive school has over 70 pupils (34%) identified as having ALN and pupils are provided with support to make progress. The school also identifies improving pupil resilience as a focus for development, suggesting that pupils with ALN at both Cymer Afan Comprehensive school and Dyffryn School are working towards the same targets. In 2015 Estyn noted that Cymer Afan Comprehensive school's arrangements for the identification and monitoring of pupils' additional learning needs were robust and thorough and that Individual Education Plans are of a particularly high quality. This will be of particular benefit should the proposal be approved, as it will support pupil transition to Ysgol Cwm Brombil and enable new staff to quickly identify need in order to continue to support pupils effectively.

Currently Cymer Afan Comprehensive school operates a support facility entitled Place of Development (POD) which provides intervention for groups of pupils with ALN including those who have difficulties with communication, social skills, behaviour, emotional needs and sensory/physical needs. Year 6 pupils are also able to have access for one morning a week. Estyn reported that the POD supports vulnerable pupils well and is of high quality. Provision for ALN pupils at the school is noted to be outstanding.

The intervention programmes which take place in the POD are similar to those taking place in similar provisions in every secondary school in Neath Port Talbot, albeit under different titles in every school. For example, ELSA provision has been noted to be an intervention programme delivered by learning support assistants in the POD, and this is also known to be successfully delivered in Dyffryn School.

It has been claimed that the pupils of Cymer Afan Comprehensive are the most vulnerable within Neath Port Talbot based on the Vulnerability

Assessment Profile (VAP) and that this proposal increases their vulnerability. The VAP is a tool developed by the local authority for identifying pupils at risk of not making progress in school. It distinguishes a range of factors which are likely to make a pupil vulnerable to underachievement, including having additional learning needs, being eligible for free school meals, being looked after by the local authority, being excluded from a previous school, having English as an additional language and having poor attendance. Moving schools is also taken into consideration and in the case of pupils who move many times during their school years, this can be a significant factor in identifying the risk of underachievement. The purpose of the VAP, however, is not only to identify such pupils but also to ensure that the school and local authority plan and provide for the pupil's needs and provision. This proposal does not affect the VAP as the identified pupils will still exist whether they attend Cymer Afan Comprehensive, Ysgol Cwm Brombil or another school, and their needs will still be identified and supported as necessary.

Neath Port Talbot and every local authority in Wales has a statutory duty to ensure that pupils with a statement of special educational needs (SEN) have their individual learning requirements fully met while at a mainstream school. All schools strive to ensure that every statemented pupil has their needs met and are no different to Cymer Afan Comprehensive in this respect. Specifically, January 2018 PLASC⁷ data indicates that at Dyffryn School there are 11 pupils with a statement (1.4%) and at Cymer Afan Comprehensive School there are 5 pupils (2.2%). Staff at Dyffryn School are well aware of their statutory duties and are used to ensuring that pupils with ALN are supported to reach their full potential. Ysgol Cwm Brombil has appointed a SENCO and an ALNCO to oversee the full range of needs that are likely to be present in the new school, and an area of the building has already been designated as a student services hub where all pupils will be able to access additional support appropriate to need.

Should this proposal be approved, it is expected that work will take place between Cymer Afan Comprehensive school and Ysgol Cwm Brombil to ensure that each pupil's statement or individual educational plan has been reviewed and appropriate provision has been identified and planned for to meet individual needs. This will further ensure that procedures are in place to fully support pupils with additional learning needs.

⁷ PLASC – the annual school census return to Welsh Government

Neath Port Talbot is committed to a person centred approach to planning for pupils with ALN and schools are being supported to embed person centred practice. The foreword of the Welsh Government document 'Developing as a person-centred organisation' contains the words "...in every situation, the needs and aspirations of the child should always be central to all aspects of discussions and decisions". It is the case that this consultation has sought to ascertain the pupils' needs and aspirations, and the views of pupils have been recorded within this report.

Respondents have commented that Cymer Afan Comprehensive is a small school and have argued that small schools attain better results. However Estyn's report 'School Size and Educational Effectiveness' (December 2013)⁸ would suggest that small secondary schools with less than 600 pupils tend to perform less well than larger schools of 1,101 pupils or more. 20% of small and medium sized schools will require significant improvement or special measures after inspection compared to 4% of large schools, and well-being is found to be excellent in 33% of large schools compared with just 4% of small secondary schools.

There is little verified research in the UK which suggests that school size has a significant impact on educational attainment, whether they be large or small schools. However, it is the case that there is a greater amount of research information available from the USA on school size, and some of this has been referred to by consultees in their responses. There is a growing call for decreasing school size in many areas there, but school size in America is vastly different to that in Wales – in some research a small school in the USA will relate to a school of 1000 pupils while a larger school can have as many as 5000. Estyn's report on school size in Wales categorises a small secondary school as having 600 pupils or less, and a large secondary school as greater than 1,100. Relying wholly on research produced in many of the USA studies can be unreliable and not directly relevant to the situation in Wales.

⁸ Estyn -

<https://www.estyn.gov.wales/sites/default/files/documents/School%20size%20and%20educational%20effectiveness%20-%20December%202013.pdf>

It is not the case that Estyn report that small schools perform better in deprived areas. It is acknowledged by Estyn that school size is only one factor that affects school performance and larger schools (1100+ pupils) may be performing better because they often have fewer pupils eligible for free school meals. However Neath Port Talbot has the second highest number of pupils entitled to free school meals in Wales. 22.6% of Neath Port Talbot pupils were entitled to free school meals compared with the Wales average of 17.8% (PLASC 2017), and as such it could be argued that all schools in this County Borough are affected by deprivation to some degree.

Class sizes in larger schools have been raised as a concern. A larger school does not necessarily mean that pupils will be taught in larger classes. Some of the larger schools in Neath Port Talbot have similar class sizes to Cymer Afan Comprehensive. Small class sizes have the biggest impact on progress of very young pupils, and the effect of a low adult to pupil ratio has very little impact by the time a pupil progresses to key stage 3, other than for those pupils with ALN. In secondary schools, greater pupil numbers can be a benefit as it can lead to broader and more balanced curriculum provision, and more opportunity for pupils to share the learning experiences with a larger peer group.

Concerns have been expressed over potential bullying in larger schools and the impact this will have on upper Afan Valley pupils who are presented as being 'different' to those living in more urban areas. There are fears that they will be more likely to become victims of bullying in a school outside of the upper Afan Valley. A number of respondents reason that because they encountered bullying while they were in school, then it follows that it will also happen to Cymer Afan Comprehensive school pupils transferring to schools outside the upper Afan Valley. Much has been achieved in recent years to raise awareness of bullying, recognising the negative effects of bullying on children and young people. Bullying is not tolerated in schools and school staff work hard to ensure that incidents of bullying are dealt with when it occurs, and that victims are properly supported. Greater respect and tolerance of diversity are promoted and pupils who are experiencing bullying are encouraged to speak out in an effort to prevent further incidents. Research⁹ indicates that physical bullying is the top bullying concern for children aged 11 and under; peer pressure is top for 12–15 year olds and

⁹ What Children are telling us about Bullying , ChildLine Bullying Report 2015/2016

online bullying for 16–18 year olds. These issues are the same regardless of the size of school that children attend. Larger schools may have more reported instances of bullying as there more pupils attending there, but research¹⁰ also indicates that there is as much as a 10% increase in pupils' awareness of bullying and of what steps can be taken to prevent bullying in larger schools (975 pupils or above) than smaller schools (258 pupils or below). There is also no firm evidence to suggest that bullies identify victims because of where they live, and it seems very unlikely that upper Afan Valley pupils will be victimised or bullied because of this, particularly in a school such as Ysgol Cwm Brombil which will have pupils from many different areas of Port Talbot. Once pupils start at Ysgol Cwm Brombil they will become pupils of that school and will be treated as such by staff and by peers. It is reported that at Dyffryn School there are few incidents of bullying or harassment and where these occur they are dealt with immediately in line with school policies. Additionally pupil voice surveys report that 99% of pupils feel safe in school and value the secure environment that the school offers. Estyn also confirm that 99% of pupils in Dyffryn School reported that they feel safe in school when surveyed during inspection in 2016.

Consultation has noted concerns that pupils moving from Cymer Afan Comprehensive school to Ysgol Cwm Brombil will suffer disruption to their education or will be disadvantaged where their work is concerned. While it is indeed the case that a move between schools can be disruptive, very many pupils move between schools regularly in Neath Port Talbot with little or no ill effect, especially when the move takes place at the start of a term or school year. Should the proposal be approved, pupils from the upper Afan Valley will start as a group at Ysgol Cwm Brombil in September 2019, not as lone individuals as would normally be the case. Many months of preparation for the move will have taken place beforehand, including planned transition events for pupils, regular staff meetings to discuss pupils, agreement over curriculum arrangements, ALN support, etc. There is sufficient time available to ensure that it can be well planned and that transition is a smooth process with pupils being fully supported throughout. Dyffryn School provides education for a wide range of abilities and the staff are used to teaching pupils with different needs and abilities.

¹⁰ A Survey into the Prevalence and Incidence of School Bullying in Wales, Welsh Assembly Government 2016

Particular concerns have been raised over pupils in Year 10 and 11 who will be sitting GCSE examinations at the time of the proposed move. Thorough planning, good communication between the two schools and support from local authority officers should alleviate these concerns and minimise disruption for pupils. Recent evaluations of Ysgol Bae Baglan's first year of opening have shown that pupils transferring there in Y11 made at least the expected level of progress regardless of the transition. Due to the changes at key stage 4, in 2017 the number of pupils attaining 5 GCSE A* to C grades including English and Maths across Neath Port Talbot schools fell to 51.4%, a 9.5pp drop from 2016. Across Wales the decrease was 5.7pp (60.3% to 54.6%). However at Ysgol Bae Baglan the percentage was 37.3%, a decrease of 6.7pp from the combined percentage of Cwrt Sart, Sandfields and Glan Afan in 2016 which is slightly greater than the national average but nearly 3pp below the decrease across all Neath Port Talbot schools. These pupils were subject to a move in Y11, coming from three different secondary schools into Ysgol Bae Baglan but the data would suggest that the move did not have a detrimental impact on the performance of these pupils.

There are concerns that current staff at the school will leave due to the threat of closure and that pupils will have a poorer education as a result. It is important that a decision on the proposal is made promptly to prevent the issue of drift and to avoid causing stress and anxiety through uncertainty. The risk of significant numbers of staff leaving the school in the final year is small and in previous school closures this has not been an issue. However, the Council respects the rights of staff to further their careers and this would be the case whether or not the council was proposing a school closure.

There is every reason to believe that Cymer Afan Comprehensive School pupils will benefit from the 21st learning environment which is being created in Margam, and will have better access to a wider range of facilities and opportunities than they do currently. Thorough transition and good communication between the schools, should the proposal be approved, will ensure that current friendship groups continue and opportunities will be given to ensure that new relationships are formed before moving to Ysgol Cwm Brombil, helping to alleviate some of the anxieties felt when faced with new and unfamiliar situations. Experience with other school reorganisations has shown this to be the case.

Consultees have commented on the fact that Neath Port Talbot is ranked as having the lowest level of social mobility in Wales compared to the other 21 local authorities. The Social Mobility Index (SMI) explores how geographical location can affect social mobility for individuals growing up and choosing to live in different areas. Officers believe that this proposal should have a positive influence on indicators of social mobility and improve opportunities for those from disadvantaged backgrounds, raising aspirations and reducing variations in pupil attainment.

As stated in the consultation document should a decision be taken to close the school, all staff with contracts attached to Cymer Afan Comprehensive School will be declared redundant. Employees identified at risk of redundancy will be supported by the Council's policies and HR staff.

As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that as a result of school reorganisation some staff take the opportunity to undertake new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a proven track record for supporting staff in such situations.

9. Federation

Respondents to the consultation fear that this proposal is paving the way for closures of the primary schools of the upper Afan Valley federation and that the federation cannot continue without the secondary school. Currently, the Council has no plans to close any of the federated primary schools. The four remaining schools are able continue to operate as a federation and continue to benefit from a federated arrangement. This can be achieved with some amendment to the leadership and governance structure currently in place.

The federation of schools in the upper Afan Valley was formed to manage the impact of falling school rolls and the financial pressures that this has placed on each school, particularly in respect of ensuring that the curriculum needs of the pupils could be met. By federating and operating under the management of one governing body, the budgets allocated to individual schools could be 'pooled' and resources directed to where needed most. It also provided the legislative framework to enable staffing structures to be changed in order to deliver education in a way that is more cost effective and efficient, the most recognisable change being the appointment of one head teacher across the five schools. The effect of this meant more resources for teaching and learning as all five schools are funded as though there was a head teacher employed at each school. The salary savings resulting from the single leadership structure allows the federated governing body to use its resources to best effect across the federation. This financial benefit will continue to be available to a federated governing body serving primary schools alone. Similarly, a single leadership structure serving the four primary schools is able to continue should the secondary school close. There is much to be gained by the four primary schools from a federated arrangement. In Wales schools are managed by governing bodies under a local management of schools scheme which gives governors the power to take decisions about how schools are run.

Transition between key stages two and three is acknowledged to be a successful aspect of the upper Afan Valley federation and concerns have been expressed that this successful transition cannot be maintained if the pupils transfer to Ysgol Cwm Brombil. While it may require thorough planning due to greater distances between the primary schools and Ysgol Cwm Brombil, it does not mean that transition cannot take place equally as well as current arrangements. Many schools across the County Borough have very good transition arrangements, even where there are distances between the secondary and partner primary schools that make the arrangements more challenging.

Success in partnership working and the transition arrangements which feature depend largely on the quality of school leadership and a willingness on the part of head teachers, teachers and governing bodies to make it a success. In this respect, Ysgol Cwm Brombil is starting from a sound position. Dyffryn School works well with its partner primaries and Estyn reported in 2014 that

partnership working was 'excellent'. As a 3-16 school, Ysgol Cwm Brombil will be ensuring that the Y6 pupils who attend its partner primary schools, which would include the upper Afan Valley primary schools should this proposal be implemented, are able to benefit from the same support that the Y6 pupils in the Dyffryn School cluster currently enjoy.

If parents choose to send their children to schools other than Ysgol Cwm Brombil then transition work would be more of a challenge as the primary schools would need to work with a greater number of secondary schools. This would undoubtedly make transition work much more difficult for the primaries.

If the secondary school were to close then secondary school staff who work across the federation may no longer be available and the delivery of some more specialist curriculum areas in the primary schools could be lost. However, Dyffryn School partner primary schools currently have a similar arrangement in place and it is anticipated that this will be developed further at Ysgol Cwm Brombil. Being part of Ysgol Cwm Brombil's cluster of partner primary schools, the upper Afan Valley pupils will benefit from secondary teaching expertise in the same way as the other partner schools would. Such arrangements would also enable secondary phase staff in Ysgol Cwm Brombil to build relationships with staff, pupils and families from an early stage, similar to work undertaken by Cymer Afan Comprehensive school.

It should be noted that not all Year 6 pupils who will move into Year 7 in Ysgol Cwm Brombil will already be in the school. Ysgol Cwm Brombil will admit children in Year 7 from Cwmafan Primary, Central Primary, Eastern Primary and Coed Hirwaun Primary, and transition work will be ongoing for pupils in these schools as well as the schools in the upper Afan Valley, to ensure that pupils move smoothly and easily from Year 6 to Year 7 every year.

10. Transport and travel

For pupils living in Neath Port Talbot, the Council is responsible for assessing the suitability of travel between home and school to enable pupils to attend school regularly. Free transport is provided for secondary age pupils living 3 miles or more from their nearest suitable school. In the case of the Council's proposal to provide education at Ysgol Cwm Brombil for pupils living in the

upper Afan Valley, although not the nearest suitable school, free transport will be made available. Detailed information on travel assistance can be found in the Council's Home to School Travel Policy¹¹.

– ***Pupil safety and well-being***

Pupil safety and well-being on school transport are given high priority by the Council which is required to put in place suitable transport arrangements to ensure that, as far as reasonably practicable, travel between home and school does not cause unreasonable levels of stress¹². For upper Afan Valley pupils attending Ysgol Cwm Brombil, the Council considers that the most suitable transport provision that meets the specific needs of the pupils involved is to provide dedicated home to school transport on buses. The route and the distance (more than 3 miles) make walking or cycling unreasonable. It is recognised that for some pupils the ability to walk or cycle from home to school will be lost under this proposal, a concern for those keen to promote fitness and reduce obesity. However there will still be opportunities through curricular and extra-curricular arrangements for pupils to learn about the importance of a healthy lifestyle and to take part in activities that promote fitness and good health. This is in line with the requirements of the Well-being of Future Generations Act, specifically the need to achieve a society in which pupils' physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. It is to be noted that, under the current home to school travel arrangements, pupils from Glyncoed, Cynonville/Duffryn Rhondda and Blaengwynfi/Abergwynfi travel to and from school by bus. It is also possible to arrange bus pick-up points that facilitate walking and cycling to the bus stop which would address concerns about reducing pupils' ability to lead healthy, active and safer lifestyles.

Before a home to school travel route is put in place, the contracted bus operator will carry out risk assessments on the suitability of vehicles and the routes. Risk assessments are updated annually to ensure that they remain relevant, taking into account any changes in circumstances and/or legislation.

¹¹ Home to School Travel Policy

https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf

¹² Learner Travel Statutory Provision and Operational Guidance - <https://gov.wales/docs/dcells/publications/140616-ltog-en-v2.pdf>

There are no specified travel time or travel distance limits that determine the length of journey between home and school. In raising concerns over the time spent on a school bus and the behaviour, well-being and safety of pupils, one respondent points to the DofE: New home to school travel and transport guidance¹³. This guidance applies to England. Wales has separate guidance, the Learner Travel Statutory Provision and Operational Guidance¹⁴. The guidance for England states that best practice suggests that the maximum each way length of journey for a secondary school age pupil is 75 minutes. Another respondent quoted a study in Northern Ireland. A recently commissioned independent review of home to school transport¹⁵ for Northern Ireland recommended a maximum journey time, including walking and waiting time, of no more than 2.5 hours per day for post-primary school pupils. The guidance in Wales does not specify journey times and relies on an assessment of reasonable journey time.

An assessment of reasonable journey time or distance is one that takes into account the learner's age, ability and the locality of the pupil's home in relation to the available schools in the vicinity. A trial bus run between the upper Afan Valley and Margam has initially assessed the route as suitable.

The distance between Gwynfi, the furthest community in the upper Afan Valley from Margam, and Ysgol Cwm Brombil is approx. 13 miles with a journey time, including stops, of approx. 45 minutes. Some secondary age pupils living in the Gwynfi area and attending Ysgol Gyfun Gymraeg Llangynwyd currently have 'travel to school' distances equivalent to the journey from the upper Afan Valley to Ysgol Cwm Brombil. Their daily travel, which takes them via Glyncorrwg and Cymmer, means a one way journey between home and school of approx. 12 miles. Primary age children attending Ysgol Cynwyd Sant have a similar daily journey of approx. 10 miles. It has been commented that this is a consequence of parental choice and that the children could attend local schools in the upper Afan Valley. The reality is that there is no nearer alternative school for children being educated through

¹³ DofE guidance - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/295189/Home_to_School_Transport_Consultation_Document.pdf

¹⁴ Learner Travel Guidance 2014 - <http://gov.wales/docs/det/publications/140616-lt0g-en.pdf>

¹⁵ Independent review of home to school transport 2015 - <https://www.education-ni.gov.uk/sites/default/files/publications/de/executive-summary-independent-home-to-school-transport-review-english-version.pdf>

the medium of Welsh. Therefore, for these pupils and their parents there is no choice.

A number of consultees have highlighted research documents which claim that the impact of journey lengths and travel time, in particular lengthy commutes, have a negative effect on well-being, including research undertaken by Prof. Jennifer Roberts in 2014¹⁶ and the Office for National Statistics (ONS), 2014¹⁷. The ONS report focuses on comparing adults travelling to work or working from home and compares aspects of well-being such as life satisfaction, sense of worth, happiness and anxiety levels. Prof. Roberts' report looks at differences between men and women and how a daily commute impacts on income, job and housing quality. Both reports conclude that lengthy commutes have a negative effect on well-being. However there is little evidence available to demonstrate effects of travel on the well-being of school children, and some of the findings reported in both pieces of research would suggest that aspects that impact most significantly on adults would not be the case for children and young people. Areas of high anxiety for adults particularly when using public transport include delays in the journey time, isolation, lack of control and lack of flexibility. For pupils travelling on school transport these factors are less likely to be of concern.

More recent research by the University of the West of England¹⁸ in 2017 highlights that a range of factors impact on well-being and report that: "longer commute times were not found to have a large impact on life satisfaction overall", although again this report refers to working adults. It does note, however, that younger people (under 30 years of age) are less sensitive to longer commute durations.

Discussions with pupils in various schools show that, for some, travelling to school by bus can lead to anxiety and stress, while for others the same journey can be an enjoyable and productive experience, where the opportunity to socialise with peers at the start and end of a school day is welcomed. An understanding that pupils are individuals who will react differently to the same situation will ensure that transition activities can be used to directly target support for those pupils who may initially be anxious

¹⁶ "It's driving her mad": Gender differences in the effects of commuting on psychological health

¹⁷ Commuting and Personal Well-being, 2014

¹⁸ The Commuting and Well-being Study: Understanding the Impact of Commuting on People's Lives

and unhappy about travelling arrangements in an effort to alleviate their concerns.

Ysgol Cwm Brombil's start and finish times have recently been agreed by Governors and it is now known that school will start at 8.30am and finish at 3.00pm. During the winter months with shortened days and average daylight of 8 hours some pupils may be leaving for school before sunrise and/or returning home after sunset. The school day will be the same length of time as other schools in the local authority, so although this will mean an earlier start for most pupils than they currently experience, it will also mean that they will finish earlier, allowing time for extra-curricular activities both at school and in their home communities.

Parents and pupils have expressed concern about potential bad behaviour on school buses travelling to Ysgol Cwm Brombil. Around 130 pupils attending Cymer Afan Comprehensive School currently travel by bus from their homes in Gwynfi, Glyncorwg and Abercregan and for these pupils it is likely that their buses will contain the same pupils when travelling to Ysgol Cwm Brombil. Pupils living in Croeserw who currently have a walk to school, a journey of approx. 20 minutes, will have a bus journey direct to Ysgol Cwm Brombil from Croeserw.

There is no evidence to support the view that bullying is more likely to take place during the journey to school than anywhere else or that it is a problem on school transport. Recent research in England and Scotland (December 2015)¹⁹ highlights that the majority of bullying incidents take place in the school environment and not during the journey to and from school. However, should bullying occur on a school bus then the school and the transport company involved would deal with any issues, as is the case currently in schools across Neath Port Talbot. The Council has a School Bus Travel Code²⁰ giving guidance to pupils on safe travel and responsible behaviour. The Travel Code gives advice on reporting poor behaviour or bullying. Pupils not following the rules of the Code could lose their right to home to school transport.

¹⁹ Bullying of young people: Recent Research in England and Scotland

²⁰ Travel Code - <https://www.npt.gov.uk/media/4228/travelbehaviourcodeenglishversion.pdf>

Escorts or passenger assistants are generally not provided on transport to secondary schools unless a pupil with Additional Learning Needs (ALN) who is capable of travelling on mainstream school transport specifically requires an assistant. The passenger assistant's main role would be to care for the ALN pupil. As regards the detailed transport arrangements for a pupil with ALN, this will depend on their individual circumstances. There is a duty on local authorities to assess and make suitable travel arrangements for children with ALN to facilitate the pupil's attendance at school including ALN pupils who, because of their specific learning needs, have difficulty travelling on buses.

The safety of pupils on the journey to and from school is a matter which the Council is active in pursuing. Since October 2014, every bus used for dedicated home to school transport must have a seat belt fitted to every passenger seat. Where a bus is fitted with seat belts, a bus operator is required to take reasonable steps to ensure that all pupils, as passengers, are informed that it is a legal requirement to wear a fitted seat belt. Wearing of seatbelts is mandatory under the School Bus Travel Code and pupils are expected to adhere to this rule.

Bus operators are required to ensure that drivers are aware of their responsibilities in the event of a vehicle breakdown, accident or dangerous road conditions and that in such circumstances they should contact their control point immediately. The Council requires bus operators to make sure that their drivers are provided with mobile telephones or are in radio contact with their home depot in case of an emergency and have available on the vehicle the telephone numbers of the people who should be notified in an emergency, such as the bus operator, the Council's Transport Unit and the schools served. In the event of a breakdown, a bus operator is contractually obliged to ensure the onward transportation of its passengers, and the responsibility for putting in place the necessary arrangements lies with the bus operator with the assistance of the Council. Where there is a need to modify or vary a route because of unforeseen circumstances, such as a road blockage resulting from a landslip, the Council has agreements in place with contractors to vary the routes and or timings.

It is recognised that weather conditions in the upper Afan Valley can differ significantly from those occurring nearer the coastline and that during the winter months snow and ice can be more of an issue. There is nothing to

suggest significant disruption of the bus services because of main highway conditions and an analysis of school closure information due to inclement weather reveals that over the previous four winters, Cymer Afan Comprehensive School has been closed for snow on only three occasions and these were in January 2013. There have been some late starts because of weather conditions and this winter has seen further closures, although on 19th March (2018), when snowfall resulted in all schools in the upper Afan Valley closing, the main roads were open to vehicles and all local bus services operated as normal including all home to school routes from the upper Afan Valley to Maesteg, Neath and Port Talbot. The only services in the area that did not operate were those cancelled because of school closures in the upper Afan Valley.

During inclement weather, such as snowfall, it is the bus operator's decision, in conjunction with the Council and the school, as to whether or not school buses should run. Should there be concerns over pupil safety because of inclement weather or road conditions then decisions regarding transportation will be taken at the time the concerns arise and will involve good communication between transport managers, operators and the school. If a vehicle is not able to go any further on a route, the operator must contact the Council's Transport Unit and, depending on weather conditions, road conditions and weather forecast, a decision will be taken about how best to proceed and what action to take. These can range from waiting for the weather to pass over, the re-prioritising of the supply of 4x4 vehicles and gritting vehicles to clear roads, to requesting assistance from the emergency services. Until alternative arrangements are in place, pupils should remain with the vehicle. To the Council's knowledge no children attending schools in Neath Port Talbot have been left stranded at school due to adverse weather conditions and good communication between all parties is vital to ensure this doesn't happen in the future. While removing groups of children from school early could be disruptive and mean that teaching time is lost, it is doubtful that this would impact significantly on pupil progress unless it were to happen on a regular basis, which is highly unlikely.

For a bus operator to hold an Operating Licence, vehicles must be correctly maintained and appropriate records are kept of all maintenance work carried out. These conditions are monitored by the DVSA and Traffic Commissioner. In addition the Council has in its conditions of contract with bus operators to

ensure that vehicle checks are conducted daily on every vehicle providing contracted services for home to school transport. Such vehicles are examined at appropriate regular intervals to ensure they are safe and road-worthy and inspections can take place without prior notice. The Council can inspect all documents and certificates relating to vehicles whenever required and can terminate contracts with bus operators as necessary.

All passenger carrying vehicle (PCV) drivers must have the relevant vocational driving licence at category D and must have a 'Driver Certificate of Professional Competence' (DCPC). To obtain a DCPC a driver must complete a minimum of 35 hours periodic driver training within a 5 year period. The DCPC will need to be renewed every 5 years. A valid Driver Qualification Card as proof of training and a valid current driver's licence must be carried at all times. Any person employed by the bus operator as a driver must be suitably, physically and mentally capable of carrying out their respective duties and shall be approved by the Council prior to their commencing any duties. Bus operators shall ensure that its drivers or any person involved will attend any courses and undertake any training organised and paid for by the Council.

Drivers must be familiar with the route, pick up locations and the school site, and bus operators shall ensure that, where possible, the same drivers are used on the same routes.

Before anyone is employed by a bus operator on a home to school transport service an enhanced criminal background check is undertaken and the Council notified of the outcome. This check is renewed every three years.

– ***Practical issues for pupils and parents***

There are practical issues in ensuring the pupils who rely on home to school transport are able to access the extra-curricular activities that a school offers and which are seen as important to pupil engagement and development, such as team sports.

Many schools, including all secondary schools in Neath Port Talbot, admit pupils from outside of the immediate vicinity of the school and very many children and young people are transported to school every day from all parts of the County Borough. These challenges are faced by many schools and are

appropriately and sensitively managed to suit the particular needs of the schools and the communities they serve.

Arrangements for extra-curricular activities are not an uncommon challenge for schools that have pupils attending from outside the immediate area of the school but, with effective management, schools ensure that all pupils have the opportunity to participate. Ysgol Cwm Brombil will also seek to put in place the necessary arrangements to ensure equality of provision and experiences for all pupils, but those are management decisions that will be taken when the outcome of this proposal is known. The temporary governing body of Ysgol Cwm Brombil has stated, they will welcome pupils and parents of the upper Afan Valley as full members of the school community. In this respect they will be keen to ensure their responsibilities towards all pupils are met equally.

There are a range of solutions to this problem found by other schools that include: arrangements with public transport companies, using school minibuses, arranging activities at lunchtime or other times during the school day or facilitating car shares with parents. Extra transport for extra-curricular activities, or for other reasons, is not provided by the local authority, although some schools do make provision for this.

The same active management arrangements will apply where pupils become unwell or need to leave school during the day. Contingency arrangements are made and schools manage the situation in the best and most appropriate way possible, always with the pupil's well-being foremost in mind.

It is noted that public transport between the upper Afan Valley and Margam is not direct and that this could cause difficulties for families without access to a vehicle. Families would not be penalised for a pupil's late arrival at school where the delay has been caused by heavy traffic, road works or other unforeseen circumstances which causes authorised home to school transport to be late. Similarly, if a pupil is required to attend a medical appointment there will be no penalty. However, getting a child to school after a medical appointment will be the responsibility of the parent in the same way as it falls to the parent to make arrangements for transport to a hospital for an appointment. With regard to the use of detention, schools with pupils relying on school transport will manage behavioural issues in ways that do not place a pupil at risk of not returning home safely.

It is the responsibility of parents/carers to ensure that their child catches the school bus on time every day, as is the case for all other pupils in Neath Port Talbot using school or public transport, or to make other arrangements for their child to make his/her way to school. Elsewhere, where pupils are transported to school there has been no noted detrimental effect on punctuality or on attendance and there is no local evidence to suggest that pupils who travel to school by bus are more likely to have issues with attendance. Concern has been expressed that the Education Welfare Service will be diminished by this proposal. The Education Welfare Service is a central provision with officers based at secondary schools. It will be for the Council to ensure that, operating from Ysgol Cwm Brombil, the support for attendance provided by the Education Welfare Service in the upper Afan Valley is as effective as the current arrangements.

Schools will strive to ensure that all parents are able to attend school organised events and will make provision to communicate effectively with parents and carers. In some situations this could mean holding meetings in the community - in the partner primary schools for example, to ensure that parents are able to attend. Once again this will be best managed by the schools involved to suit the needs of the particular pupils who attend. Parents will not be able to claim transport expenses from the local authority or from the school.

– ***Travel to Ysgol Cwm Brombil***

Until a decision is taken on the Council's proposal and parents indicate their preferences for an alternative school, details of bus routes and bus stops remain to be determined. At this stage it is not possible to be specific about how many buses will be required for any given route and where buses will need to stop. This may not be known until the year of transfer as parents can choose not to send their children to Ysgol Cwm Brombil if they wish. Any works needed to bus stops, such as adding shelters, will not be identified until it is known which stops will be used. At this stage no additional infrastructure work on bus stops is planned.

The trial run took place on Thursday, 1st February 2018 using a 54 seater coach. At 8.38 a.m. the coach departed from the bus turning area at Heol Y Nant, Blaengwynfi, and travelled to the Ysgol Cwm Brombil site in Margam,

arriving at 9.14 a.m., a journey of 36 minutes. Adding on 9 x 'one minute' stops between Jersey Road, Blaengwynfi, and Pentwyn Road, Cynonville, to simulate pupil pick-ups, the total journey time between Blaengwynfi and Ysgol Cwm Brombil is estimated to be approx. 45 minutes.

A return test drive departed Ysgol Cwm Brombil on the same day at 3.19 p.m. and arrived at the bus turning area, Heol Y Nant, Blaengwynfi at 3.55 p.m., which replicated the morning's drive time of 36 minutes. Applying the same 9 x 'one minute' stops results in a total return journey time of approx. 45 minutes.

Because of pupil numbers, it is possible that the school bus from Gwynfi will be full before it arrives at Cymer and, therefore, not all stops included in the test drive will necessarily be made on a day to day basis, which could result in marginally shorter travel time to Ysgol Cwm Brombil.

Site configuration at Ysgol Cwm Brombil provides off road parking for school buses. Pupils boarding the buses will do so at the bus bays within the confines of the school site where there are sufficient bus bays for the number of buses required for the anticipated pupil roll of the school.

A full traffic impact assessment has been undertaken in order to inform the planning considerations and approvals for the new school build. Planning consent has been granted.

Concerns have been expressed at the perceived poor air quality in Port Talbot and Margam. These relate to a view held that attending a school near the M4 motorway and in the close vicinity of the steelworks will be detrimental to the health and well-being of pupils from the upper Afan Valley. This view will have been reinforced by recent media reports describing Port Talbot as "Britain's most polluted town". Such media claims follow the publication of a World Health Organisation (WHO)²¹ report that quoted figures to support this 'most polluted' view of the town - figures that the WHO now accepts are wrong. In contrast, the correct figure puts Port Talbot, despite being bisected by the M4 and hosting one of Europe's biggest steel mills on a par with, or cleaner than, many other towns and cities. The WHO has taken immediate steps to rectify the mistake on its website and database.

²¹ World Health Organisation - <http://www.who.int/>

The WHO praises all cities that collect and disseminate information on outdoor air quality for their actions. Neath Port Talbot Council is active in monitoring its air quality and has a longstanding strategy and programme to manage this process. It regularly monitors and reports its local air quality measurements.

The most recent Air Quality Progress Report (July 2017)²² demonstrates good progress and no cause for concern in the Margam area. This will help to alleviate concerns that pupils will be at risk of suffering ill effects from air pollution if they attend Ysgol Cwm Brombil.

Extra traffic on the road will increase levels of emissions. However, it is the case now in the upper Afan Valley that approx. 130 pupils are transported daily to Cymer Afan Comprehensive School. Travelling by vehicle to school for many pupils; particularly for those living in rural areas is a necessity, not an option. However, pupils travelling to school on relatively few school buses will have less environmental impact than pupils travelling in numerous cars. The Council's home to school transport policy will make available to secondary age pupils in the upper Afan valley school transport to Ysgol Cwm Brombil, free of charge. Whilst Ysgol Cwm Brombil is the Council's designated receiving school, Maesteg Comprehensive is the nearest suitable school and free transport will also be available there if admission is approved and transport requested. This removes the need for parents to transport their children to school. It is recommended that pupils who are entitled to free home to school travel use the buses provided.

The Council recognises air quality issues locally and has a longstanding strategy and programme to address it. The Council is involved in a research programme with three universities led by Cardiff and Swansea universities in environmental monitoring work as well as working closely with the manufacturing sector and other partners to make improvements. The Welsh Government is also playing its part with the recent proposal to extend the 50 mph limit on the M4.

²² Air Quality Progress Report - <https://www.npt.gov.uk/media/7900/npt-progress-report-2017.pdf>

11. 21st Century build projects

This proposal seeks to enable upper Afan Valley pupils to benefit from a 21st century school build and to ensure that they have the same opportunities as other Neath Port Talbot children and young people in new build schemes.

Ysgol Cwm Brombil will open in the autumn term 2018 and will provide pupils from the areas currently served by Dyffryn School and Groes Primary with a new build, state of the art school. This does not mean that pupils attending will be taught a different curriculum to any other school in Neath Port Talbot or in Wales, but it does mean that they will benefit from having a 21st century learning environment, built specifically to meet the needs and aspirations of education at this time and for the foreseeable future. There is a growing body of research available which highlights how an improved learning environment can benefit outcomes. Estyn reported in 2007 (*An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises*) on its findings which, while recognising other research from other countries within and outside the UK had some differences in conclusions, were able to identify 16 secondary schools in Wales for which direct attainment comparisons could be made. A comparison of the core subject indicator (CSI) at the end of key stage 4 over three years (2003 -2005) revealed that the percentages of pupils attaining the CSI went up by an average of 3.9pp in new build schools.

Other research also demonstrates that the impact of the learning environment on pupil progress can be significant with some studies claiming that a child / young person's progress can increase by up to 25% in an academic year when in a favourable environment. New build schools benefit from increased natural light, better acoustics, effective sound proofing and more efficient temperature control, all elements which are proven to have an impact on a pupil's ability to learn. New builds also provide greater natural outdoor spaces, which are widely recognised to be of benefit to health and emotional well-being, and to ensure that there are large spaces both indoors and outdoors available for pupils for recreation, leading to improvements in well-being and social interaction. All of these factors will greatly enhance the teaching and learning experience for staff and pupils.

It has been suggested that evidence has been provided by the Education Endowment Foundation (EEF) that disagrees with this research. This has been derived from the Sutton Trust-EEF Teaching and Learning Toolkit which is 'an accessible summary of educational research', originally commissioned by the Sutton Trust and produced as the 'Pupil Premium Toolkit' by Durham University in May 2011. It is viewed as a resource which helps head teachers prioritise pupil premium spending (additional funding for publicly funded schools in England to raise the attainment of disadvantaged pupils of all abilities) and currently covers over 30 topics, each summarised in terms of their average impact on attainment, the strength of the evidence supporting them and their cost. The EEF has not carried out research into new school builds but using research that is available does suggest that providing pupils with a new building can be very expensive and on its own does not improve attainment. This agrees with the statements above – a building alone cannot make a difference to outcomes, but new buildings can greatly improve and enhance the educational experience for staff and pupils which, in turn, improves conditions for teaching and learning, and which can ultimately impact on pupil attainment.

Ysgol Cwm Brombil will replace Dyffryn School and Groes Primary school and is being constructed on the existing site shared by the two schools. Dyffryn School is a secondary school on two separate sites and was identified as being in need of significant repair work and a strong business case was developed to obtain funding for a new build school to incorporate pupils from 3 to 16 years of age. Including Groes Primary in the scheme not only provides pupils with the benefits of an 'all-through' education, but also meant that all of the site would be available for development and that primary pupils would also be able to enjoy and benefit from new build, 21st century facilities. The existing shared site is in the Council's ownership and available to the Council for a new build. It is suitable in size to meet the accommodation and external area requirements of a combined primary and secondary school. Cwmafan has been suggested as a more central location for a secondary school serving the Afan Valley and Port Talbot / Margam areas. There is no obvious land mass available in the Cwmafan area suitable in size or location for a 1200 place secondary school.

It has been stated that it is the vision of Neath Port Talbot Council to create 3 - 16 schools, and while it is indeed the case that in some areas 3 -16 schools

have been developed, whether as single site new builds or under a federated arrangement, the Council does not consider that this is the only approach for delivering education. For pupils in the upper Afan Valley a 3-16 educational experience has been of benefit. However, as set out in the consultation document, a review of education in the area would suggest greater benefits can be realised by secondary aged pupils through receiving their education at Ysgol Cwm Brombil.

It has been stated that parents from the upper Afan Valley will not support the Council's consultation proposal to transfer pupils to Ysgol Cwm Brombil even if it is implemented. Instead they will send their children to alternative schools or make arrangements for children to be home educated. Should the Council decide to implement its plan, then it is hoped that the benefits to the pupils in attending Ysgol Cwm Brombil will be acknowledged by parents. A concern has been expressed about oversubscription at the new school with pupils from the upper Afan Valley being denied places there. Where demand for places at Ysgol Cwm Brombil exceeds its capacity, then the Council, in line with its admission policy, will ensure that priority for places is given to the catchment area pupils. Under this proposal, pupils from the upper Afan Valley will become catchment pupils of Ysgol Cwm Brombil and will have the same entitlement and priority to a place as other pupils living within the realigned catchment area.

Ysgol Cwm Brombil is due to open to pupils in 2018, while this proposal has an implementation date of September 2019. It has been suggested during consultation that it would be fairer for all pupils to start in the new school at the same time. It is too late for this to happen unless parents make that choice ahead of the outcome of this consultation. There are some advantages for Cymer Afan Comprehensive school pupils in not joining until the year after the school opens. This will give parents and prospective pupils an opportunity to see the school in operation and for transition events to take place in a finished building with management systems and curriculum arrangements already in place. As the secondary aged pupils of Ysgol Cwm Brombil currently exist in Dyffryn School, and consequently are, in the main, occupying the site of the new school, it is expected that they will be familiar with its structure and operation, and therefore the transition for them should be more straightforward. For pupils in Cymer Afan Comprehensive school who may not share the same awareness and understanding of the site and the build,

transition will need to be more thorough and carefully managed, so an extra year for this to take place could be of value.

It is the case that the Governing Body of Ysgol Cwm Brombil will have been established in the autumn term 2018, and it may be more difficult for parents from Cymer Afan to join the governing body after 2019. Nevertheless, discussions can take place with the temporary Governing Body to find a solution to this challenge if it is deemed to be a significant factor in the success of pupils moving to the school. If the proposal is implemented then, in advance of the pupils transferring, arrangements may be made for a representative of the upper Afan Valley to be included on the governing body at the time it is constituted. The current temporary Governing Body at Ysgol Cwm Brombil already comprises of members of the governing bodies of Dyffryn and Groes who have come together to work as one for the good of the new school regardless of which previous school they represented, and it is to be expected that any new governor and any additional representative to the governing body would work with the same purpose and intention.

A suggestion to make Welsh language provision available at Cymer Afan in addition to the current English language provision has been put forward. The number of pupils from the upper Afan Valley attending Welsh-medium schools is very small and will have no significant impact on the small numbers attending Cymer Afan Comprehensive School. An increase in pupil numbers seeking Welsh-medium education will result in fewer available for English-medium education as it will be the same group of pupils from which both mediums of instruction will need to draw.

Ysgol Cwm Brombil is intended to accommodate 210 primary age pupils (plus nursery) and 1200 secondary age pupils. There will be sufficient space within the new school to accommodate secondary age pupils from the existing catchment area of Dyffryn School together with additional pupils from elsewhere, up to the intended capacity limit of 1200. There is insufficient capacity on site to accommodate the intended primary and secondary pupil rolls of 210 (plus nursery) and 1200 respectively together with additional primary school(s). A transport assessment for Ysgol Cwm Brombil was prepared by external consultants, a requirement of the planning application²³

²³ Planning application -

http://appsportal.npt.gov.uk/ords/idocs12/f?p=Planning:2:0::NO::P2_REFERENCE:P2016/1022

for the school. It addresses the transport management of pupils, including additional pupils from outside the current catchment area.

Should it be the case that pupils from the upper Afan Valley do not attend Ysgol Brombil, there are a number of alternative options for making use of the accommodation available, discussion of which is outside the scope of this report and which will be subject to separate consultations should the need arise.

Funding for a new school via the Welsh government's 21st Century School Programme requires that 50% of the costs are met by the Council. With limited resources the Council is required to make best use of the funding it has available and to deal with the highest priority schemes first. It will also need to be mindful of getting value for money from its capital build expenditure. Supporting a new build, small secondary school could not be considered to represent good value based on the business case for a scheme with disproportionately high costs.

12. Building condition and size

There is a Welsh Government calculation²⁴ that determines the number of pupils a school can accommodate. This calculation is used to determine the size of primary and secondary schools. Head teachers are involved in the calculation for their school and the results are reported to the Welsh Government annually. For Cymer Afan Comprehensive School the calculation shows that the school has capacity for 641 pupils and with 229 pupils on roll it could accommodate a further 412.

The Council regularly assesses the condition of school buildings in order to identify areas that need maintenance and repair together with any refurbishments that are required to keep the buildings operational, including access for people with disabilities. This work is then prioritised with the highest priority schemes being tackled first. The assessments are carried out by a surveyor in the Council's Environment Department. The Council's

²⁴ Measuring the capacity of schools in Wales
<https://gov.wales/docs/dcells/publications/111104measuringcapacityen.pdf>

surveys have been sampled and independently checked by private sector consultants appointed by the Welsh Government.

There are many more schools in Neath Port Talbot in need of maintenance and repair than the Council has funds to deal with. Even after the £123m joint investment in NPT schools through its Strategic School Improvement Programme and Band A of the Welsh Government's 21st Century Schools Programme there will remain an estimated backlog of repair costs across the Council's school building portfolio of c.£75m despite spending c.£1.2m annually on maintenance and repair. The costs at Cymer Afan Comprehensive school amount to c.£3m. Maintenance and repair keep a school operational; in brief the work keeps the building safe, warm and watertight. Importantly, it does not provide a new facility that meets the standards expected at a new build school. The Welsh Government's 21st Century Schools Programme of funding is intended to deliver the new build / remodelled schools, and not maintenance and repair schemes. However, 50% of the costs of a new build / remodelled school has to be found by the Council. For the Council to make best use of its limited resources it is necessary to ensure that the resources it invests in schools are used efficiently and that projects are carefully selected to give best value for money. In line with the requirement of the Welsh Government's 21st Century Schools Programme, schools with the poorest building conditions are given priority. Cefn Saeson Comprehensive School falls into this category.

All schools will have access to their condition surveys and are supported by a multi-disciplinary team of technical staff to manage maintenance issues. A dedicated building surveyor is assigned to the school to monitor and respond to building maintenance matters. Cymer Afan Comprehensive has had c.£370,000 of repair and maintenance works carried out since 2014.

Estyn is the education and training inspectorate for Wales. Its function is to provide an independent inspection and advice service on quality and standards in education and training provided in Wales. It does not comment or report specifically on maintenance and repair issues of school buildings.

In July 2016, the Ministerial Taskforce for the South Wales Valleys was set up to look at how investment in the Valleys is delivered in a joined up and strategic way with the aim of leading the regeneration and sustainable growth

of the valleys. In March 2018 the taskforce published a high-level delivery plan which outlines its priorities for the future, 'Our Valleys, Our Future'. Working groups have been set up to look at specific areas of the plan and each is led / chaired by a member of the taskforce. The plan does not make provision for funding the upkeep of school buildings or supporting school budgets.

At the present time no decision has been taken on what will happen to the building should the school close. Any future use will be considered within the context of the Council's corporate asset management process. While demolition or securing the site will incur costs these are likely to be one off rather than recurring costs.

13. Wider community

A Community Impact Assessment (CIA) has been undertaken for the purpose of providing information on the impact of the proposal on the local community's access to facilities and services currently available at the school. It has been prepared in line with the requirements of the Welsh Government's School Organisation Code. It is not to provide an opinion on the long term consequences of school closure as has been suggested by some consultees. The CIA has been prepared using a range of sources and evidence, including discussion with various partner organisations in the upper Afan Valley and the school, and it is usually the case that the consultation process provides further information all of which enables decision makers to have a fuller understanding of the possible consequences on communities as a result of school closure.

The CIA has found that there are opportunities to relocate community based activity from the school to alternative locations. These locations can be enhanced as appropriate with no loss of amenity to the wider community.

The CIA contains a comprehensive assessment of the facilities and services in the upper Afan Valley and while the need to understand and mitigate the impact of a school closure proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

The proposal consults on the closure of the secondary school. It does not seek to remove education as a whole out of the area. The current four primary schools, which along with the secondary school make up the federation, are not currently under review and do not form part of this proposal. It is expected that these schools will remain federated and will continue to provide pupils and staff with the benefits of federation within the communities where they are sited.

The proposal is not intended to isolate the upper Afan Valley but rather to provide children and young people who reside there with greater opportunities and experiences than they currently have access to. There is no reason to suggest that by attending school in another part of Neath Port Talbot or elsewhere children and young people will no longer 'belong' to the community where they live. The Community Impact Assessment (CIA) highlights the fact that many community based activities and events are not reliant on the secondary school and so it is not apparent why it is held that these activities would not continue, or why children and young people who currently enjoy participating in them would not want to do so should they attend school elsewhere. Schools are open to pupils for 190 days of the year. Outside of the school day; that is, before and after school, weekends and during school holidays, secondary school pupils will be in the upper Afan Valley and available to make use of local facilities.

Even if implemented, there will still be four primary schools in the upper Afan Valley providing education for approx. 450 primary age children, together with the accompanying employment of teachers and support staff, and the delivery of support services. The Council's investment in education in the upper Afan Valley although modified, will continue. Similarly, the investment in secondary education continues with education provision being made for the pupils of the upper Afan Valley although delivered outside the upper Afan Valley.

It is already the case that pupils attend schools other than Cymer Afan Comprehensive, although this is currently a small number. Pupils from the upper Afan Valley attend secondary schools including Ysgol Bae Baglan, Maesteg School, Ysgol Gyfun Gymraeg Llangynwyd, and others for a variety of reasons. It is also the case that primary age pupils travel from the upper Afan Valley to Ysgol Cynwyd Sant in Maesteg and to schools across Neath Port Talbot including Blaenbaglan Primary School, Abbey Primary School,

Catwg Primary School and Tywyn Primary School. Children and young people do not only mix socially through their schooling as many will attend local after school groups or be part of wider community events. There is no reason why this wouldn't continue to be an important part of their lives should the proposal go forward. In other communities where school closures have taken place and where fears have existed that pupils would lose their sense of identity, it appears that this that this has not happened and that pupils continue to take part in community events.

The Valleys Taskforce Strategy is concerned with ensuring that progress is made against the following three key priorities – good quality jobs and the skills to do them, better public services and my local community. The 'Our Valleys, Our future' delivery plan sets out in detail how these priorities will be achieved, who will be involved, the expected benefits, and the timescales for completion. It is unlikely that this proposal will hinder any of the key priorities from being achieved in the upper Afan Valley as the existence of the secondary school neither prevents nor enables the development of the plan at the current time.

The proposed Afan Valley Adventure Resort is at the very early stages of development and does not have any direct relation to this proposal. There are no plans to sell the school land to the developers for the scheme.

The proposed development intends to create an adventure resort comprising 600 lodges, 100 bed hotel, adventure activities, restaurants and associated administration and parking, in two phases. The first phase which will involve the vast majority of the work will take at least two years to construct. Before any work commences there will need to be a range of planning permissions and conditions to be explored and put in place, which could take some considerable time. The developers have yet to submit a complete formal planning application. On the basis of the information that has been made available, the potential for the regeneration of local communities through job creation and attracting new homeowners seems limited. It has been suggested by consultees that the development will increase the pupil roll at Cymer Afan and that any decision regarding the future of secondary education in the upper Afan Valley should be deferred until the resort is in operation. The development is unlikely to have a direct impact on school places. Pupil numbers provided in the consultation document do not take any account of

increased numbers as a result of the development as there is no indication of what those numbers might be, or even whether there will be an increase at all. It is not clear whether the resort will indeed attract extra workforce into the upper Afan Valley or whether there are already people in the area able to fulfil the requirements of the positions needed. For information, the formula²⁵ used by the Council to estimate pupil numbers generated by housing developments suggests that to achieve 350 extra pupils would require in excess of 2000 new households, although there is currently under occupation of existing domestic dwelling stock.

There is nothing in the scoping application to indicate that education would be eligible for a financial contribution from this proposed development. Respondents have suggested that the development could result in schemes for pupils or school leavers of Cymer Afan Comprehensive to gain apprenticeships or work experience. Should the development progress then this should still be a future possibility which can be explored for the young people in the upper Afan Valley even though they may be attending a school elsewhere.

The Child Poverty Strategy for Wales has been taken into account by the Council and this proposal will contribute to its aims, particularly in relation to raising educational attainment.

The NPT Single Integrated Plan²⁶ seeks to help and support people fulfil their learning potential by implementing a structured programme of school re-organisation that delivers schools that are 'fit for purpose' and meet a 21st century standard.

The Single Integrated Plan also seeks raise standards; improve pupil outcomes; reduce surplus places and ensure that sufficient and appropriate school places are available and that schools are accessible to pupils. These improvements will take place in the context of ensuring that the provision of education within the County Borough is delivered in an efficient and cost effective manner.

²⁵ https://www.npt.gov.uk/PDF/ldp_written_statement_jan16.pdf

²⁶ https://www.npt.gov.uk/media/6872/sip1_2013_2023.pdf

Cymer Afan Comprehensive school is a large employer, although many of its employees live outside the upper Afan Valley. The Council has a good track record on redeployment and will be working hard to secure the future employment of staff at risk of redundancy.

Respondents have suggested that Cymer Afan Comprehensive school is a rural school and, therefore, protected from closure. The Council is aware of proposals by the Welsh Government to give added protection to rural schools, but this matter is still being consulted upon²⁷. This is likely to take the form of a presumption against closure subject to the outcome of robust local consultation. The Council believes that the current consultation on the: 'Future of Secondary Education in the upper Afan Valley' would meet the necessary standards required by the Welsh Government. It is the case that, under the draft proposals for protecting rural schools, no school within Neath Port Talbot would qualify for this added protection.

14. Consultation quality

Consultation on the future of secondary education in the upper Afan Valley follows the procedures required under the Welsh Government's School Organisation Code which specifies the type of school organisation activity on which the Council is required to consult and the process to be followed in conducting consultation. The Code also specifies the persons with whom the Council must consult and each consultee will have been contacted and have had the consultation document made available to them. In this regard, a school organisation proposal has an identified audience and that audience has been appropriately targeted in line with the Code. In addition to the requirements of the Code, face to face meetings were held with key stakeholders, namely: parents, pupils, staff and governors. There is no duty placed on the Council by the Code to hold such meetings but the Council recognises the contribution these can make to informing decision making. Similarly, there is no requirement to hold a meeting with the wider community but, again, the Council, anticipating local concerns and realising the benefit of community engagement, held a face to face meeting.

²⁷ <https://beta.gov.wales/school-organisation-code>

Throughout the consultation period the consultation document and associated papers were available on the Council's website located on the Council's Strategic School Improvement Programme webpage. The Council website's search facility provided an electronic link to the relevant documentation, using simple phrases such as: 'Consultation Cymer' or 'Consultation Afan', for example. Analysis of SSIP webpage activity shows a high level of 'page views'.

Information about the consultation on the future of secondary education in the upper Afan Valley appeared on the Council's website in the form of a press release of 3rd November 2017, which was also issued widely to press contacts. This was picked up by Media Wales and ran as the front page headline story of the South Wales Evening Post on Saturday 4th November. It also appeared in the Western Mail and online at Wales Online. Similar print and web coverage was given to an article on 17th November 2017 for which the Council provided a quote urging stakeholders to participate in the consultation. A further article was published in the Evening Post and online on 18th January 2018. The Council has also responded to requests from ITV and The Wave for details of the consultation, resulting in further broadcast and web coverage. Notice of the meeting with the community was both 'tweeted' and posted on the Council's Facebook page on 30th January 2018, which included a link to the Strategic School Improvement Programme webpage.

The turnout for all meetings, particularly the parents and wider community, suggested that the relevant information had reached the intended audience and there was an appropriate level of stakeholder engagement.

Separately, consultation took place on a proposal to close Dyffryn School and Groes Primary School and create a new 3-16 school in a new build on the current Dyffryn upper school site between October and December 2016. Parents and pupils of Groes Primary and Dyffryn School together with other stakeholders were consulted on the establishment of Ysgol Cwm Brombil; consultation which would have included the number of secondary age pupils the school would accommodate. The economic case for opening Ysgol Cwm Brombil is not dependent on the future of secondary education in the upper Afan Valley. Although the pupil capacity of Ysgol Cwm Brombil presents an opportunity to provide for pupils from outside the Port Talbot / Margam area,

consultation on that matter could be considered separately as is the case with this proposal. In this respect it is no different to considering a long established school with surplus places.

Ysgol Cwm Brombil is not yet open; this is scheduled for September 2018. As such, preparations for its opening are being managed by a temporary governing body set up for this specific purpose. The temporary governing body, which includes parent and community governors, has been consulted on the 'Future of secondary education in the upper Afan Valley' and has expressed support for the Council's proposal.

It has been suggested that Neath Port Talbot Council cannot be an impartial judge of the responses it receives from the consultation as it has a vested interest in the closure of Cymer Afan Comprehensive School in order to satisfy the requirements of the business plan for Ysgol Cwm Brombil. Officers of the Council do not agree with this assertion.

Major school reorganisation, such as establishing a new build school to replace existing schools, comprises three main areas of activity, namely: securing the necessary funding, consulting with stakeholders on the proposal for change and ensuring relevant planning permissions are granted. In addition, relevant Council committee approvals are needed.

In the case of Ysgol Cwm Brombil, funding for the new build school relies on a combination of Welsh Government 21st Century Schools capital grant support and match funding from the Council. The Council's match funding element is not dependent on the proposal currently being consulted upon, i.e. the closure of Cymer Afan Comprehensive school. The current consultation on the future of secondary education in the upper Afan Valley is separate to the business case process and a decision on the outcome of that consultation does not impact on the establishment of Ysgol Cwm Brombil. In the opinion of officers the decision-making of elected Members is, therefore, not compromised.

The consultation document is required under the statutory code to contain specific information on a range of technical matters - education, building condition, finance, etc. It may well be the case that some of these issues will require the use of professional terminology and vocabulary specifically relating to the subject area which some consultees may not readily recognise or

understand. One of the purposes in arranging 'face to face' consultation meetings is to give consultees the opportunity to ask questions about the document and to seek clarification on any matters about which they are unclear. Additionally officers have been available throughout the consultation period to respond to telephone or email queries regarding any aspect of the proposal and consultation document, including explaining educational terminology. No specific queries seeking explanation of terminology have been received.

Comments have been received which express the view that this consultation process has not provided consultees with sufficient information to enable an intelligent consideration and response, and that it is an unlawful process in that it has not followed proper policies and procedures, and has not complied with fairness and equality rules. Both this consultation process; namely, the consultation on the future of education in the upper Afan Valley and the consultation for Ysgol Cwm Brombil have followed the procedures set down by the Welsh Government under the School Standards and Organisation (Wales) Act 2013²⁸ and School Organisation Code²⁹. All requests for extra information have been met by officers and queries received have been responded to. The consultation process has resulted in over 3000 written responses, along with a considerable number of verbal responses through consultation meetings, suggesting that it has been possible for a significant number of people to consider the proposal and to make a response.

A range of options were presented in the consultation document along with the preferred option of officers giving sufficient reasons to allow consultees to give intelligent consideration and an intelligent response. It is recognised the consultation process should be undertaken when proposals are still at a formative stage. This is the case with this consultation as the Council will conscientiously take into account the responses before finalising its decision. As such the views of consultees are able to influence the decision making process. An undertaking has been given that alternative proposals brought forward as part of the consultation process will be fully explored and will help elected Members take a reasoned and rational decision as to how the future of secondary education in the upper Afan Valley is to be progressed. It will be

²⁸ School Standards and Organisation (Wales) Act 2013 -

<http://www.legislation.gov.uk/anaw/2013/1/contents/enacted>

²⁹ School Organisation Code - www.assembly.wales/Laid%20Documents/SUB-LD9303%20-%20School%20Organisation%20Code-29042013-245748/sub-ld9303-e-English.pdf

for elected Members to decide on the most appropriate proposal, if any, to take forward. Contrary to a view held by the federated governing body, the Catholic and Church in Wales Diocesan Authorities were advised of the consultation and invited to comment.

The document contains information on all schools affected by the proposal and is considered by officers to be balanced and even-handed, containing sufficient information on the schools to enable consultees to gain a view of quality and standards of education. Estyn, the inspection body responsible for monitoring standards of education in Wales has been consulted on the proposal for the upper Afan Valley and, specifically on the content of the consultation document, has commented that appropriate reference is made to the outcomes of the school's most recent Estyn inspection and on the current performance and the prospects for improvement of the school

The School Organisation Code requires that the consultation document must be issued during the term time of the schools affected and that consultees must be given at least 42 days to respond to the document. The consultation period in this case ran from December 11th 2017 to 14th February 2018, with the period for consultation exceeding this requirement.

A child's rights impact assessment (CRIA) has not been completed for this proposal as it is not required. In Wales, CRIAs have been in place for a number of years and, although not mandatory, are seen as a primary tool for delivering Ministerial duties on children's rights.

In 2011, the Rights of Children and Young Persons (Wales) Measure placed a duty on Welsh Ministers to have due regard to the Convention on the Rights of the Child, and to undertake this duty in a number of ways including through CRIAs which can cover policies, legislation, regulations, strategies, projects and programmes. From 2012 to date, around 260 CRIAs have been undertaken across Welsh Government.

While a CRIA has not been completed, this consultation has taken into account the United Nations Convention on the Rights of the Child. The School Organisation Code requires that the Council makes suitable arrangements to consult with the pupils of any school which is affected by school organisation proposals and, where possible, children and young

people who are likely to attend that school. All pupil consultations conducted as part of the Council's Strategic School Improvement Programme are conducted within the framework provided by the National Standards for Children and Young People's Participation in Wales and adhere to the principle that 'Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account' - Article 12: The United Nations Convention on the Rights of the Child.

Pupil consultations and related documents in Neath Port Talbot follow the guidance issued by Welsh Government in the: 'School organisation: consultation with children and young people' guidance document 2013³⁰. The guidance gives details of good practice which includes meeting with pupil representatives (usually School Council members), making sure that pupils know how to make their views known, that they are aware of the school organisation process and the specific timetable for key events, e.g. the dates of the consultation period. A separate consultation document for pupils is not a statutory requirement; however it is considered to be good practice and is an established part of the process in Neath Port Talbot. A pupil consultation document was made available for this proposal for the schools to use with their pupils as was felt appropriate.

In addition, 'face to face' meetings were held with pupils. Extra copies of the pupil consultation document were available at these meetings but few pupils took them, suggesting that they either already had copies or felt confident that they already understood enough about the proposal and didn't need them. At each meeting it was stressed that their enquiries, comments and opinions were important and pupils were given full details of how to respond to the consultation. Over 130 comment forms or letters were received specifically from pupils across the upper Afan Valley, suggesting that pupils were aware of the consultation process and had received sufficient information to be able to make an informed response.

Comments have been received which claim that the pupil consultation document is 'of poor quality' and does not present all the information contained in the full consultation document. As noted above the pupil

³⁰Guidance document 2013 - <https://gov.wales/docs/dcells/publications/131113-school-organisation-consultation-with-children-and-young-people-en.pdf>

consultation document is not a statutory part of the process and so does not need to contain the level of information required in the full document, however the document does have regard to the list of matters set out in the School Organisation Code presented in an accessible way for the intended audience, which in this case is mainly older primary and secondary school pupils. The general format of pupil consultation documents has been refined following the involvement of education professionals working with pupils of all abilities in the primary and secondary sectors across Neath Port Talbot schools and is generally considered to be appropriate. Careful consideration is given to its content - too much information can make it difficult for some pupils to access even with the help of an adult, so not all of the aspects of the full consultation document are included. It does contain information on where to access the full consultation document should pupils so wish, as well as contact details for pupils to get in touch with officers directly should they choose to do so.

Concern has been expressed about lack of information regarding safeguarding staff salaries. The consultation document specifically addresses this matter³¹, setting out the potential impact on staff and citing the Council's past record on supporting staff in such situations. Until it is decided to implement this proposal, it would not be appropriate to hold discussions on the circumstances of individual members of staff.

15. Finance

Schools are funded for their 'day to day' running mainly from money allocated directly by the Council and by means of Welsh Government grants that become available from time to time. Even though federated, the five schools in the upper Afan Valley receive individual school budgets. The money allocated to a school by the Council becomes that school's money to manage in the way that it feels best in order to meet the educational needs of pupils. This applies to individual schools and to a group of schools managed as a federation, such as the five schools in the upper Afan Valley federation. It is the head teacher and the federated governing body that decides how that money is spent.

³¹ Consultation document page 10 – Impact on school based staff.

Federating the schools in the upper Afan Valley and operating them under the management of one governing body has allowed the budgets for the five individual schools to be 'pooled' and the money to be used where needed most across the federation. Federation has meant more resources for teaching and learning as all five schools are funded as though there was a head teacher employed at each school. With only the cost of a single head teacher to meet, the remaining money can be used elsewhere in the schools. Without federating, it is likely that some of the schools would have had difficulty managing the financial pressures brought about by falling school rolls combined with small numbers of pupils on roll. There is much to be gained by the four primary schools remaining in a federated arrangement should the secondary school close. The cost of providing education to secondary age pupils is greater than that of primary. This is because more specialist provision, materials and equipment is required at secondary school level. Averaging the 'per pupil' cost of the primary and secondary schools in the federation would not give a true reflection of the funding needs of Cymer Afan Comprehensive school pupils. It would also have the unintended consequence of over inflating the cost of providing primary education, bringing the value for money for the primary schools into question. School budgets are determined, for the most part, by pupil numbers on roll.

Funding the five schools by way of a federation is an investment by the Council in keeping education in the upper Afan Valley. Added to which the schools also benefit from small school funding supplement and protection. The level of funding per pupil is generous compared to other schools in the County Borough. Despite a view held by some consultees, the Council's proposal is not about cost saving as the money will be reinvested within education. The efficiencies from educating secondary age pupils from the upper Afan Valley at Ysgol Cwm Brombil will be ring fenced for reinvestment within education. As such, there is no reduction in education expenditure overall. Cost is not more important than quality but delivering education has a cost and this needs to be more equitably distributed between all pupils in the County Borough. The levels of need experienced in the upper Afan Valley are similarly present in other areas of NPT.

Home to school travel is estimated to cost an additional c.£76k as a result of this proposal and it has been suggested that this money could be used to improve the fabric of the existing school. The estimated cost of repair at

Cymer Afan Comprehensive school is £3m. At £76k annually, it would take almost 40 years to cover this cost. In the Council's proposal the additional transport costs would be offset by the savings from 'per pupil' funding at Cymer Afan Comprehensive school. Home to school travel costs are paid for directly by the Council. Other travel costs, approved by a school, are met from that school's budget.

The Council receives an allocation of money each year from the Welsh Government to fund education, including schools. This is, in part, based on actual and forecasted pupil numbers for all schools. The money which the Council sets aside for schools is distributed to individual schools by a formula with the money being shared in an open and transparent way. Schools are regularly consulted on the formula that the Council uses. There is a mechanism in the secondary schools' formula that provides additional money to Cymer Afan Comprehensive as it is a small school. In addition, there are grants allocated for specific purposes. In the current financial year, pupils at Cymer Afan Comprehensive school receive £6,822 per pupil compared to the average for other comprehensive schools of £4,245. This compares to £7,111 per pupil and an average of £4,476 for the previous financial year. Last year the school also received a pupil development grant³² of £94,300, an education improvement grant of £17,382 and a Welsh in education grant of £1,369. (In the 2018/2019 financial year the school will receive a pupil development grant of £94,300, an education improvement grant of £15,000 and a Welsh in education grant of £1,344.)

Access to wind farm grants has been proposed as a means of meeting the high costs of education in the upper Afan Valley. The most significant of the wind farm funds is that of Pen Y Cymoedd Wind Farm. Officers have met with representatives of the Wind Farm's Community Fund to explore opportunities for partnership working and have been advised that the Fund cannot support activities which are the statutory responsibility of the Council, such as funding schools. The Community Fund currently supports education based projects in schools, but these are additional to the statutory functions and funding responsibilities of the Council. It is possible that the Wind Farm and the Council could engage in a partnership to deliver projects such as the provision of a community library in a community hub setting. Shared facilities financed

³² Welsh Government financial support for reducing the impact of poverty on educational attainment

in this way could bring revenue and capital cost benefits but these would fall far short of the funding needed to effectively support the running of a school.

Both the potential cost of redundancies and the additional cost of home to school travel were addressed in the consultation document³³.

16. Alternative school organisation

Consultees have requested that consideration be given to a range of options for alternative school organisation in the upper Afan Valley. These consisted of options that involved new school builds, the remodelling of existing premises and combinations of both, together with proposals for a hub of community services. Each option has been individually assessed, the evaluations are set out in the pages that follow. A number of the issues raised and the subsequent responses are common across the various options. For clarity they have been included and repeated as necessary in individual assessments. For the sake of completeness, additional options for school organisation have also been considered.

Guidance on accommodation and external area specifications for mainstream schools are set out in Building Bulletins³⁴. The key components of a secondary school comprise: teaching areas (general classrooms, practical lesson areas and performance spaces, etc.); halls (main hall, sports hall an activity studio, etc.); learning resource areas (library, learning support, SEN resource base, etc.); staff and administration (staff room, reception, admin & reprographics, etc.); dining (kitchen; dining area, etc.), toilets and personal care (pupil, staff, visitor toilet areas, hygiene rooms, changing rooms, etc.) and storage (materials preparation, equipment, instruments, etc.). The assessments that follow are based on Building Bulletins 98 & 99, the space allocation for primary and secondary schools adopted by the Welsh Government for grant funding purposes³⁵. This is a basic space standard which is less than the Council would ordinarily seek to build. The specifications in the Building Bulletins only allow for the accommodation needs of a school and not for the requirements of other service providers.

³³ Consultation document pages 9 & 29 – Impact on travel arrangements & Financial overview

³⁴ Building Bulletin issues 98 and 99 - briefing frameworks for secondary and primary school building projects: <https://www.gov.uk/government/publications/building-bulletin-98-and-99-school-project-briefing-frameworks>

³⁵ 21st Century Schools Programme - Band B, capital grant funding

Option A: a new 11-16 English-medium school to replace Cymer Afan Comp., built on existing site

This proposal would deliver a 21st century facility in the upper Afan Valley, removing any requirement to travel outside the valley for English-medium secondary education. It would also remove the backlog maintenance and repair costs associated with the existing Cymer Afan Comprehensive School as well as addressing surplus places.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on a school for approx. 250 pupils³⁶ aged 11-16, to be built on the existing Cymer Afan Comprehensive school site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

A new school of 250 pupils requires an external area of approx. 27,230m² together with 3,925m² of accommodation, although this could be reduced to approx. 3,325m² by utilising the existing sports hall.

The Cymer Afan Comprehensive school site together with the grass playing field and the floodlit ATP & sports hall covers an area of approx. 30,800m². As such, the secondary school site when combined with the facilities available at the primary school site could be considered to be sufficient in size to accommodate a new build school.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£9.7m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings; asbestos removal; remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire

³⁶ Assumes an element of projected growth – table 4, consultation document

of temporary classrooms for approx. 250 pupils which may be required during the build process. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

This proposal does not address the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, nor the teaching and learning challenges presented by a small secondary school.

The 2018/19 budget share for Cymer Afan Comprehensive School is £1,547,000, equating to £6,822 per pupil, which is approx. 60% higher than the average for secondary schools in the County Borough at £4,245.

It would also remove the potential for redundancy costs.

Option B: a new 11-16 English-medium school to replace Cymer Afan Comp., built on existing site and to include secondary age pupils from Ysgol Cwm Brombil

This proposal would deliver a 21st century facility in the upper Afan Valley, removing any requirement to travel outside the valley for English-medium secondary education. Pupils would benefit from being part of a larger school community. It would also remove the backlog maintenance and repair costs associated with the existing Cymer Afan Comprehensive school, as well as addressing surplus places.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on an estimated combined secondary school roll for Cymer Afan Comprehensive and Ysgol Cwm Brombil of approx. 1250 pupils aged 11-16, with the new school being built on the existing Cymer Afan Comprehensive school site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

A new school of 1250 pupils requires an external area of approx. 71,750m². Additionally, approx. 10,234m² of accommodation would be required although this could be reduced to approx. 9,634m² by utilising the existing sports hall.

The Cymer Afan Comprehensive school site together with the grass playing field and the floodlit ATP & sports hall cover an area of approx. 30,800m². As such, the secondary school site even when combined with the facilities available at the primary school site is insufficient in size to accommodate the required new build school.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£29m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Cymmer; asbestos removal; any remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms for approx. 250 pupils, required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting 1000 extra pupils daily, equivalent to at least 13/14 coaches additional to those already needed for pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

This proposal would benefit from economies of scale and address the inequity in per pupil funding that currently exists.

The 2018/19 Budget Share for a similar size school would be £4,478,000, equating to £3,597 per pupil compared to a sector average of £4,245.

There are potential redundancy costs associated with this option.

However, such a proposal would undermine the £30m investment in the new build, 21st century, state of the art, school at Margam - Ysgol Cwm Brombil. This school is currently under construction as a 3-16 school and is due to open later this year, September 2018. Transferring provision of secondary education from Ysgol Cwm Brombil to the upper Afan Valley will significantly impact on the primary phase at this 'all-through' school.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

Option C: a new 11-16 English-medium school to replace Cymer Afan Comp., built on existing site and to include pupils from Cefn Saeson Comp.

This proposal would deliver a 21st century facility in the upper Afan Valley, removing any requirement to travel outside the valley for English-medium secondary education. Pupils would benefit from being part of a larger school community. It would also remove the backlog maintenance and repair costs associated with the existing Cymer Afan Comprehensive and Cefn Saeson Comprehensive schools as well as addressing surplus places.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on an estimated combined secondary school roll for Cymer Afan Comprehensive and Cefn Saeson Comprehensive of approx. 1000 pupils aged 11-16, with the new school being built on the existing Cymer Afan Comprehensive site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

A new school of 1000 pupils requires an external area of approx. 60,000m². Additionally, approx. 8,550m² of accommodation would be needed although this could be reduced to approx. 7,950m² by utilising the existing sports hall.

The Cymer Afan Comprehensive site together with the existing grass playing field and the floodlit ATP & sports hall cover an area of approx. 30,800m². As such, the secondary school site even when combined with the facilities available at the primary school is insufficient in size to accommodate the required new build school.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£23.8m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Cymmer; asbestos removal; any remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms for approx. 250 pupils, required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting 750 extra pupils daily, equivalent to at least 10/11 coaches additional to those already needed for pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

This proposal would benefit from economies of scale and address the inequity in per pupil funding that currently exists.

The 2018/19 Budget Share for a similar size school would be approx. £4,245,000, equating to £4,245 per pupil which is the same as the sector average. There are potential redundancy costs associated with this option.

However, such a proposal would undermine the Council's plans for a new build, 21st century, state of the art, school at Cimla, Neath to replace Cefn Saeson Comprehensive.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding. Cefn Season Comprehensive school has been included in the Council's 21st Century Schools Band B capital grant

funding submission to the Welsh Government for a new build new school on the existing site.

Option D a new 11-16 English-medium school to replace Cymer Afan Comp., built on existing site and to include additional pupils from Maesteg Comp.

This proposal would deliver a 21st century facility in the upper Afan Valley, removing any requirement to travel outside the valley for English-medium secondary education. Pupils would benefit from being part of a larger school community. It would also remove the backlog maintenance and repair costs associated with the existing Cymer Afan Comprehensive school site as well as addressing surplus places.

Importantly, Bridgend County Borough Council is the local authority with responsibility for Maesteg Comprehensive, a relatively new build school constructed in 2008 with over 1100 pupils on roll including a 6th Form. Decisions about its future rest with that Council - not with Neath Port Talbot. Also, this proposal includes provision for a 6th Form and, as such, it does not align with this Council's tertiary education policy where 16 – 19 age education is delivered at a local college³⁷.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on an estimated combined secondary school roll for Cymer Afan Comprehensive and Maesteg Comprehensive, including its sixth form, of approx. 1350 pupils aged 11-18 with the new school being built on the existing Cymer Afan Comprehensive site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

³⁷ NPTC Group, except for Welsh-medium and Faith school education

A new school of 1350 pupils (incl. 6th form) requires an external site area of approx. 76,450m². Additionally, approx. 11,585m² of accommodation would be required although this could be reduced to approx. 10,985m² by utilising the existing sports hall.

The Cymer Afan Comprehensive school site together with the grass playing field and the floodlit ATP & sports hall cover an area of approx. 30,800m². As such, the secondary school site even when combined with the facilities available at the primary school is insufficient in size to accommodate the required new build school.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£32.9m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Cymmer; asbestos removal; any remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms for approx. 250 pupils, required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting 1100 extra pupils daily, equivalent to at least 15/16 coaches additional to those already needed for pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

This proposal would benefit from economies of scale and address the inequity in per pupil funding that currently exists.

The 2018/19 Budget Share for a similar size school would be approx. £5,731,000, equating to £4,245 per pupil which is the same as the sector average. There are potential redundancy costs associated with this option.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

Option E: a new 3-16 English-medium school to replace Cymer Afan Comp. and the partner primary schools of Croeserw, Cymer

Afan, Glyncorrwg and Pen Afan, built on the Cymer Afan Comp. site

This proposal would deliver a 21st century facility in the upper Afan Valley for secondary and primary age pupils; removing the backlog maintenance, repair costs and surplus places associated with the existing school sites and any requirement to travel outside the valley for English-medium secondary education.

In order to evaluate this proposal a new 3-16 school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected of a new build 3-16 school.

The assessment has been based on a school for approx. 700 pupils to be built on the existing Cymer Afan Comprehensive site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

A new school of 700 pupils (250 aged 11- 16 & 450 aged 3-11) requires an external area of approx. 34,630m². Additionally, approx. 6,290m² of accommodation would be required although this could be reduced to approx. 5,690m² by utilising the existing sports hall.

Cymer Afan Comprehensive school site

The Cymer Afan Comprehensive site together with the grass playing field and the floodlit ATP & sports hall covers an area of approx. 30,800m². As such, the secondary school site even when combined with the facilities available offsite is insufficient in size to accommodate the required new build school.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£17m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Cymmer (and other sites as appropriate); asbestos removal; remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms

for approx. 250 pupils, required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting extra primary age pupils, 4/5 coaches daily which could be in addition to transport for secondary age pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

Cymer Afan Comprehensive and Cymer Afan Primary school sites combined

The Cymer Afan Comprehensive site together with the Cymer Afan Primary school site cover an area of approx. 41,180m². By retaining and utilising accommodation at Cymer Afan Primary school, a category B condition building, approx. 5,285m² of additional accommodation would be required. When the present site is combined with the facilities available at the primary school, including existing accommodation, sufficient area is available for the new school, which would then be a mix of new build and existing premises.

The build only costs associated with this scheme (accommodation & external areas) are estimated at c.£16m, although as with the estimate above there are key elements not included.

Either of the above schemes would benefit from economies of scale with fewer sites to manage and maintain. However, a single 3-16 school in this form would undermine the £5.2m investment in the new build primary school at Blaengwynfi, Pen Afan Primary.

Neither of these schemes addresses the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, nor the teaching and learning challenges presented by a small secondary school.

The 2018/19 budget share for the secondary phase of this school would be £1,547,000, equating to £6,822 per pupil, compared to the secondary sector average of £4,245.

The 2018/19 budget share for the primary phase of this school would be £1,382,000, equating to £3,162 per pupil funding, compared to the primary

sector average of £3,625. This compares with the combined per pupil funding for the four existing primary schools of £4,128.

There are some potential redundancy costs associated with this option.

Delivery of either scheme would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

A separate proposal suggested building a new 3-16 school to replace Cymer Afan Comprehensive and the partner primary schools of Croeserw, Cymer Afan and Glyncorrwg. This would retain the new Pen Afan Primary school and reduce the site size requirements and build costs. Whereas this would support the investment at Blaengwynfi, it would result in additional costs incurred in managing and maintaining two schools on separate sites.

Option F: refurbish Cymer Afan Comp. and relocate the partner primary schools of Croeserw, Cymer Afan, Glyncorrwg and Pen Afan to the remodelled Cymer Afan Comp. site

This proposal would not deliver a 21st century facility in the upper Afan Valley for secondary or primary age pupils. It would, however, remove the backlog maintenance, repair costs and surplus places associated with the existing school sites and any requirement to travel outside the valley for English-medium secondary education.

In order to evaluate this proposal building bulletin space standards have been adopted to ensure the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces could be delivered.

The assessment has been based on a school for approx. 700 pupils to be built on the existing Cymer Afan Comprehensive site. To avoid unnecessary doubling-up of provision, the grass playing field used by the school – the red field, together with the floodlit ATP & sports hall located at the Cymer Afan Primary school site have been included in the calculations.

A school of 700 pupils (250 aged 11- 16 & 450 aged 3-11) requires an external area of approx. 34,630m². Additionally, approx. 6,290m² of accommodation would be required although this could be reduced to approx. 5,690m² by utilising the existing sports hall.

Cymer Afan Comprehensive school site

The Cymer Comprehensive school site together with the grass playing field and the floodlit ATP & sports hall cover an area of approx. 30,800m². As such, the secondary school site even when combined with the facilities available offsite is insufficient in size to accommodate the required remodelled school.

Backlog maintenance and accessibility costs at Cymer Afan Comprehensive are estimated at c.£3m. However, establishing a 3-16 school on a secondary school site will require extensive remodelling in order to convert secondary school premises into accommodation, internal and external, suitable for primary school children. The costs of remodelling is estimated³⁸ at c.£15m.

Furthermore, this estimated cost does not include costs resulting from demolition of existing buildings at Cymmer (and other sites as appropriate); asbestos removal; remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms for approx. 250 pupils, required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting extra primary age pupils, 4/5 coaches daily which could be in addition to transport for secondary age pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

Providing a primary school environment in remodelled secondary school buildings is likely to be costly as accommodation will need to be made suitable for younger children, particularly in terms of being able to adequately deliver the Foundation Phase where the curriculum needs and accommodation requirements are significantly different to secondary phase education. The building condition of the existing secondary school, adaptability, access challenges and general layout required for such a wholesale primary phase

³⁸ Welsh Government cost calculator for major remodelling

remodelling militate against this proposal. It is unlikely that any significant financial benefits would be realised on such a scheme and a new build school would probably prove to be the preferred option on grounds of affordability and lifecycle costs.

Cymer Afan Comprehensive and Cymer Afan Primary school sites combined

The Cymer Comprehensive school site together with the Cymer Afan Primary school site covers an area of approx. 41,180m². By retaining and utilising accommodation at Cymer Afan Primary school approx. 5,285m² of additional accommodation would be required. When the existing site is combined with the facilities available at the primary school, including existing accommodation, sufficient area is available for the new school. This would then be a mix of remodelled and existing premises across two sites, the existing secondary and the primary.

The build only costs associated with this scheme (accommodation & external areas) are estimated at c.£14m, although as with the estimate above there are key elements not included.

If delivered, either scheme would benefit from economies of scale with fewer sites to manage and maintain. However, a single 3-16 school in this form would undermine the £5.2m investment in the new build primary school at Blaengwynfi, Pen Afan Primary.

Neither scheme addresses the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, nor the teaching and learning challenges presented by a small secondary school.

The 2018/19 Budget Share for Cymer Afan Comprehensive school would be £1,547,000, equating to £6,822 per pupil funding, compared to the secondary sector average of £4,245.

The 2018/19 Budget Share for a similar size Primary school would be £1,382,000 equating to £3,162 per pupil funding, compared to the primary sector average of £3,625. This compares with the combined per pupil funding for the four existing primary schools of £4,128.

There are some potential redundancy costs associated with this option.

Delivery of either scheme would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

A separate proposal suggested building a new 3-16 school to replace Cymer Afan Comprehensive and the partner primary schools of Croeserw, Cymer Afan and Glyncorwg. This would retain the new Pen Afan Primary school, and reduce the site requirements and build costs of this proposal. Whereas this would support the investment at Blaengwynfi, it would result in additional costs incurred in managing and maintaining two schools on three separate sites.

Option G: a new 11-16 English-medium school to replace Cefn Saeson Comp., built on existing site and to include additional pupils from Cymer Afan Comp.

This proposal would deliver a 21st century facility for secondary age pupils from Cimla, Neath, and the upper Afan Valley. It would remove the backlog maintenance, repair costs and surplus places associated with both existing school sites. Whereas it would not retain secondary education in the upper Afan Valley, travel time and distance for pupils would be slightly less than the journey to Ysgol Cwm Brombil proposed in the consultation. Cefn Saeson Comprehensive school is approx. 9 miles from the furthest community in the upper Afan Valley. Cymer Afan Comprehensive school would still close although, compared to the Council's consultation proposal, the date of closure would probably be delayed while the new school at Cimla, is being constructed.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on an estimated combined secondary school roll for Cymer Afan Comprehensive and Cefn Saeson Comprehensive of approx. 1000 pupils aged 11-16, with the new school being built on the existing Cefn Saeson Comprehensive site.

A new school of 1000 pupils requires an external site area of approx. 60,000m². Additionally, approx. 8,550m² of accommodation would be required.

The present site covers an area of approx. 61,289m². As such, the secondary school site is insufficient in size to accommodate the required new build school and the acquisition of additional land would appear to be necessary.

The build only costs associated with this proposal (accommodation & external areas) are estimated at c.£25.5m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Cimla; asbestos removal; any remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms which may be required during the build process. This also does not include an assessment of the travel costs and traffic impact associated with transporting 250³⁹ extra pupils daily, equivalent to at least 3/4 coaches. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

This proposal would benefit from economies of scale and address the inequity in per pupil funding that currently exists at secondary age level.

The 2018/19 Budget Share for a similar size school would be approx. £4,245k equating to £4,245 per pupil which is the same as the sector average.

There are potential redundancy costs associated with this option.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

³⁹ Assumes an element of projected growth – table 4, consultation document

Option H: a new 3-16 English-medium school to replace Cymer Afan Comp. and the partner primary schools of Croeserw, Cymer Afan, Glyncorrwg and Pen Afan, built on the Croeserw Primary school site

This proposal for a 3-16 school at Croeserw is presented as an alternative to a new build 3-16 school on the Cymer Afan Comprehensive school site. It, too, seeks to deliver a 21st century facility in the upper Afan Valley for secondary and primary age pupils, removing the backlog maintenance, repair costs and surplus places associated with the existing sites and any requirement to travel outside the valley for English-medium secondary education.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected of a new build 3 -16 school.

The assessment has been based on a school for approx. 700 pupils aged 3-16 to be built on the existing Croeserw Primary school site.

A new school of 700 pupils (250 aged 11- 16 & 450 aged 3-11) requires a site area of approx. 34,630m². Additionally, approx. 6290m² of accommodation would be required.

Croeserw Primary school site is approx. 28,900m². As such, the site is insufficient in size to accommodate a new build 3-16 school. An adjacent ATP and a nearby playing field are possibly available for school use subject to negotiations and agreements but these have not been included as the space available would still be undersize.

The build only costs associated with this proposal (accommodation and external areas) are estimated at c.£18.7m. However, this estimate does not include additional costs resulting from the demolition of the existing buildings at Croeserw Primary school, a category grade C building (and other sites as appropriate); asbestos removal; remedial work identified during site investigations; meeting modern space and access requirements for car

parking/bus bays; and the hire of temporary classrooms for approx. 150 pupils required during the build process. Also not included is an assessment of the travel costs and traffic impact associated with transporting extra primary age pupils, 4/5 coaches daily which could be in addition to transport for secondary age pupils from the upper Afan Valley. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

If delivered, this proposal would benefit from economies of scale with fewer sites to manage and maintain. However, a proposal in this form would also undermine the £5.2m investment in the new build primary school at Blaengwynfi, Pen Afan Primary.

This proposal does not address the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, nor the teaching and learning challenges presented by a small secondary school.

The 2018/19 Budget Share for Cymer Afan Comprehensive school would be £1,547,00, equating to £6,822 per pupil funding, compared to the secondary sector average of £4,245.

The 2018/19 Budget Share for a similar size Primary school would be £1,382,00 equating to £3,162 per pupil funding, compared to the primary sector average of £3,625. This compares with the combined per pupil funding for the four existing primary schools of £4,128.

There are some potential redundancy costs associated with this option.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

A separate proposal suggested building a new 3-16 school to replace Cymer Afan Comprehensive and the partner primary schools of Croeserw, Cymer Afan and Glyncorwg. This would retain the new Pen Afan Primary school and reduce the site size and build costs. The effect at Croeserw would be to reduce the accommodation required to 5683m² and build costs to c.£17m.

Whereas this would support the investment at Blaengwynfi, it would result in additional costs incurred in managing and maintaining two schools on separate sites.

Option I: a new 3-16 English-medium school to replace Cymer Afan Comp., built alongside any partner primary school on their respective sites

This proposal would deliver a 21st century facility in the upper Afan Valley for secondary age pupils, removing any requirement to travel outside the valley for English-medium secondary education. It would also remove the backlog maintenance and repair costs associated with the existing sites as well as addressing surplus places.

In order to evaluate this proposal a new secondary school built to 21st Century Schools Programme construction and space standards has been assessed and costed. Such a build would provide the necessary classrooms, specialist rooms and accompanying indoor and outdoor facilities and associated spaces expected at a new build secondary school.

The assessment has been based on a school for approx. 250 pupils⁴⁰ aged 11-16, to be built on any partner primary school site alongside the existing primary school; namely, Cymer Afan Primary, Croeserw Primary, Glyncorwg Primary or Pen Afan Primary. This scheme would deliver a mix of new build and existing premises.

A new school of 250 pupils requires an external area of approx. 27,230m² together with 3925m² of accommodation.

The site areas for the respective schools are: Cymer Afan Primary - 17,300m²; Croeserw Primary - 28,900m², Glyncorwg Primary – 4241m² and Pen Afan Primary – 12,365m².

It is only Croeserw Primary school site that could be considered to be of a size capable of accommodating a 250 place secondary school. The current site, is insufficient in size to accommodate a 250 place secondary school together with the existing Croeserw Primary school and would rely on access to offsite

⁴⁰ Assumes an element of projected growth – table 4, consultation document

provision such as a playing field, ATP or the purchase of additional land. A primary school of 163 pupils requires an external area of approx. 3956m² and accommodation of approx. 1074m² when combined with a secondary school build.

Similarly, the next largest site, Cymer Afan Primary school at 17,300m², is also insufficient in size to accommodate a 250 place secondary school and this is the case even where land in the Council's ownership and adjacent to the school is included, the combined site area being 23,482m².

The build only costs associated with a new secondary school of 250 pupils (accommodation & external areas) are estimated at c.£9.7m. However, this estimate does not include additional costs resulting from any demolition or remodelling of the existing buildings; asbestos removal; remedial work identified during site investigations; meeting modern space and access requirements for car parking/bus bays; and the hire of temporary classrooms which may be required during the build process. Also not included is an assessment of the traffic impact associated with transporting secondary age pupils daily to the respective primary school sites. These works and costs have not been assessed at this stage because approval to progress this scheme would be needed to justify the fees that would be incurred.

This proposal would benefit from economies of scale from having the secondary and a primary school on one site. However, this proposal does not address the inequity in per pupil funding at secondary level resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, nor the teaching and learning challenges presented by a small secondary school.

The 2018/19 Budget Share for a similar size secondary school would be approx. £1,547k equating to £6,822 per pupil funding, which is approx. 62% higher than the average for secondary schools in the County Borough which was £4,245

There are some potential redundancy costs associated with this option.

Delivery of this proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

Option J: relocate Cymer Afan Comprehensive school to a different building or buildings within the community

This proposal would not deliver a 21st century facility in the upper Afan Valley for secondary age pupils. It would remove any requirement to travel outside the valley for English-medium secondary education. It would also remove the backlog maintenance and repair costs associated with the existing Cymer Afan Comprehensive school site as well as addressing surplus places and potential redundancy costs.

A school of 250 pupils requires an external area of approx. 27,230m². Additionally, approx. 3,925m² of accommodation would be required consisting of facilities appropriate for secondary education.

Relocating the secondary school pupils to a different building or buildings in the upper Afan Valley is likely to involve extensive work to ensure even basic facilities are fit for purpose and meet statutory requirements for educating 11-16 year olds. These include dining areas, circulation spaces, hall/gym space, toilet facilities and sufficient outdoor spaces for recreation and curriculum delivery. Specialist equipment needed for subjects such as science and technology would need to be moved and relocated to the identified building(s), a process which is expensive and often difficult to achieve. Importantly, safeguarding arrangements, including health and safety regulations, would need to be fully met, which again may be expensive and difficult to achieve depending on the building(s) identified. These arrangements may also have implications on current users.

The costs associated with this proposal have not been assessed as no suitable potential site(s) has been identified other than the school sites already assessed in this report. Approval to progress this scheme would be needed to justify the fees that would be incurred in undertaking feasibility assessments.

The year-on-year high costs of educating a relatively small number of secondary aged pupils is not lessened by this option and may even be increased depending on the location of the building and the management arrangements.

Option K: create a school for KS2 (ages 7 - 11) and KS3 (ages 11 – 14) from the upper Afan Valley

This proposal would impact on all pupils in the upper Afan Valley. Whereas, under this proposal, Foundation Phase pupils would remain in their current schools where the focus would be on delivering the Foundation Phase curriculum alone, junior school aged children from across the communities of the upper Afan Valley would transfer to the KS2/KS3 provision, wherever that was located. Under this proposal, they would remain there until aged 14 years when they would transfer to a secondary school outside the upper Afan Valley for KS4 (year 10 & year 11) education.

Recent changes to the curriculum in Wales have encouraged a more cohesive approach to teaching and learning across years 6 and 7 and this proposal could facilitate this approach. There could be advantages for more able year 6 pupils who could access the KS3 curriculum at an earlier stage. For others, however, this option could prove less attractive.

Transferring to another secondary school at 14 years of age (that is, at the end of year 9) could be considered to be more problematic than the traditional transfer at the end of year 6 (age 11 years) when children from other primary schools will be joining the secondary school together, giving them the chance to establish friendship groups and settle into a new school at the same time as their peers. Moving a year group of approx. 50 upper Afan Valley pupils at year 10 **every** year could cause difficulties – for the pupils who will have to make new friends and settle into an already established year group at an unfamiliar school, and for the staff continually having to get to know new pupils every year at a time when they will need to focus students on preparing for external examinations. (The current proposal would mean that a move in year 10 would happen only once in 2019 for one group of pupils). Over 70 pupils in years 9 & 10 have moved school in this academic school year in Neath Port Talbot but this was be across the whole of the secondary school estate, rather than all in one school. It would be the case however that older pupils should be less likely to have difficulty travelling to another school.

The impact on the respective primary schools will also be significant. With KS2 pupils from all of the primary schools moving to a site with secondary

pupils, the remaining infant pupils will effectively be taught in 4 separate 'infant' schools, which this Council has moved away from in favour of the benefits of primary phase (3-11 years) education. Transferring from a very small infant school at age 7 to a larger school environment on a different site involving a bus journey could, potentially, be a traumatic experience for some young children. Transition between infant and junior phases (Foundation Phase and KS2) would need very careful planning. With only Foundation Phase pupils on each primary site, the buildings will be more than 50% empty, potentially making running costs unaffordable.

Another suggestion has proposed the same model as above but accompanied by the rationalisation and reduction of the primary school sites with the remaining site(s) providing Foundation Phase teaching and learning only. This would potentially ease the excess surplus places but would still result in transition difficulties.

The site areas for the respective schools are: Cymer Afan Comp – 30,800m² (inc. grass field, ATP & Sports Hall); Cymer Afan Primary - 17,300m² (inc. adjacent land - 23,482m²); Croeserw Primary - 28,900m², Glyncorrwg Primary – 4241m² and Pen Afan Primary – 12,365m².

Extensive remodelling or new build would be required to accommodate either junior pupils on the secondary school site or secondary school pupils on a primary school site which is far more complex than the addition to a primary school site of a few portakabins or temporary classrooms, as suggested in one response. Whichever site was chosen, based on current pupil numbers it would be necessary to provide for approx. 220 junior age pupils and approx.150 secondary age pupils, a total of 370. Such an arrangement would require an external area of approx. 25,590m² and accommodation of approx. 4,741m². A school for 150 secondary age pupils alone would require a site area of 21,130m² and accommodation of 3,411m². It is only Croeserw Primary school and Cymer Afan Primary school that might be able to accommodate a KS2/KS3 provision, although the sites are short of the area required.

This proposal would not benefit from economies of scale as there will be no fewer sites to manage and maintain. It would, though, ensure that some secondary education is retained in the upper Afan Valley.

Delivery of the proposal would rely on capital funding for which business case approval would be needed in order to access Welsh Government 21st Century Schools Programme grant funding.

This proposal does not address the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost, although the overall impact would be less with fewer secondary school pupil being funded at the higher level.

The 2018/19 Budget Share for the secondary school can be assumed to be at least £1,023,000, equating to £6,822 per pupil funding, compared to the secondary sector average of £4,245.

The 2018/19 Budget Share for a similar size primary school would be £770,000 equating to £3,419 per pupil funding, compared to the primary sector average of £3,625.

Additionally funding would be needed for Foundation Phase provision (200+ pupils) as it is not included in the figures above, and which could be significant.

There are some potential redundancy costs associated with this option.

Option L: to continue to deliver a 3-16 years education locally in the upper Afan Valley as a federation and to have a collaborative working arrangement in place with Maesteg and/or Cefn Saeson Comprehensive School to deliver a wider curriculum

This proposal would not deliver a 21st century facility in the upper Afan Valley for secondary or primary age pupils. It would, however, remove any requirement to travel outside the valley for English-medium secondary education.

This proposal would potentially benefit from having the support of a secondary school working collaboratively with the federation. Nevertheless, a proposal in this form would not address repair and maintenance costs at Cymer Afan

Comprehensive school nor the surplus places across the schools in the upper Afan Valley unless there was significant capital investment in the primary schools to remove unwanted accommodation for which capital investment would be needed, investment that would rely on business case approval by the Welsh Government in order to access 21st Century Schools Programme grant funding.

This proposal does not address the inequity in per pupil funding resulting from the relatively small number of secondary pupils on roll - a year on year recurring revenue cost that will continue under this proposal. Although the proposal seeks to address the teaching and learning challenges presented by a small secondary school, the delivery of a wider curriculum offer by another secondary school would be an additional cost burden, either directly on that school or that school's local authority. It is unlikely to prove attractive to those schools that are potentially in a position to offer a collaborative working arrangement as room exists for pupils to transfer to Maesteg Comprehensive and Ysgol Cwm Brombil where, in both cases, pupils would be able to access and benefit from new build facilities. This will also be the case at Cefn Saeson should the application for 21st Century Schools programme money become available to build a new school at Cimla, Neath.

Importantly, Bridgend County Borough Council is local authority with responsibility for Maesteg Comprehensive. Decisions about its involvement in a collaborative working arrangement rest with that Council - not with Neath Port Talbot.

Option M: a community Hub provision - community facilities and services at the respective school sites

The evidence from the options assessed shows that the existing site areas of upper Afan Valley schools are insufficient in size to accommodate the requirements of most of the proposed school configurations. This situation has a direct impact on any plans to create a hub of services, particularly where additional accommodation onsite is sought. The accommodation and external area assessments have been based on building bulleting specifications which set out the basic accommodation requirements for a school. Whereas community use of school premises through the hire of facilities is encouraged and promoted, this has to be an additional usage and

secondary to the needs of the school, as the principal users. Accommodating community services located offsite in buildings adjacent to the school is beyond the scope of this consultation report's option assessment process. Discussions have been held with NPTC Group regarding 14 -16 education. Whereas it is possible to deliver the junior apprenticeship programme from a number of different locations, including the upper Afan Valley, there is no obvious substantive benefit to any host school in this approach. Discussions have also been held with the Community Library and with Pen Y Cymoedd Wind Farm regarding access to the Wind Farm's Community Fund. Potential developments involving other services providers, including the private and voluntary sectors, require a longer planning and preparation cycle than allowed for in this consultation. Given the constraints identified in the alternative options considered, a hub based on a primary school only model presents greater opportunity in relation to meeting space and traffic requirements, and cost effectiveness and efficiency.

17. The next step

Following the publication of this consultation report, should the Council decide to progress with its plans as consulted upon then the next stage will be for it to approve the publication of a proposal, allowing 28 days for objections.

Consultees are advised that, unfavourable comments made during the consultation period will not be treated as objections. Anyone wishing to object will need to do so in writing during the statutory objection period. Comments submitted as part of this consultation process will need to be re-submitted in writing during the statutory objection period if they are to be considered as objections.

Appendices

Appendix A

Consultees

Cymer Afan Comprehensive School, together with the other federated schools of the upper Afan Valley	Pupils Parents Federated school staff Federated governing body School community groups/users Local community
Other schools	NPT schools (incl. the temporary Governing Body of Ysgol Cwm Brombil) Maesteg School
Trade Unions	Regional Organisers
Secondary Head Teachers' Group Primary Head Teachers' Group	NAASH LLAN
NPT Schools Forum	
NPT Elected Members	All
Town/Community Council	Pelenna
AM for Aberafan AM for Neath	David Rees Jeremy Miles
Regional AMs (South Wales West)	Suzy Davies Bethan Jenkins Caroline Jones Dai Lloyd
MP for Aberafan MP for Neath	Stephen Kinnock Christina Rees
Bordering Authorities	Swansea Bridgend Carmarthenshire Powys Rhondda Cynon Taf

Faith school education authorities

The Diocese of Menevia
The Diocese of Llandaff

Regional Education Consortium

ERW

Estyn

Children & Young Person Partnership
(incl. Early Years Development and Childcare

Communities First Partnership

NPTC Group

Neath Port Talbot 14-19 Network

SEN Partners

Action for Children
Child & Adult Mental Health Services
(CAMHS)
Consultant Community Paediatrician
The Children's Centre NPT Hospital
(Physiotherapy)

NPTCBC Integrated Transport Unit

Police & Crime Commissioner

Alun Michael

WG Schools Management Division

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of the meeting with staff held at 3.45 p.m. on Wednesday, 17th
January 2018 at Cymer Afan Comprehensive School

Present: Aled Evans (AE), *Director of Education, ELLLS*
Andrew Thomas (AT), *Head of Transformation, ELLLS*
Rhiannon Crowhurst (RC), *Strategic School Improvement
Programme, ELLLS*
Richard Gordon (RG), *Strategic School Improvement
Programme, ELLLS*
Amy Hutchings (AH), *Human Resource Officer, CHEX*
Maureen Treharne (MT), *Human Resource Officer, CHEX*

Mairwen Goodridge (MG), *Chair of Governors (Federation of
schools of the upper Afan Valley)*
Cedric Burden (CB), *Head Teacher (Temporary)*

Teaching and support staff of the five schools of the Federation
of schools of the upper Afan Valley

Union Representatives

Welcome introduction:

1. CB welcomed staff and officers to the school

The proposal:

2. AE introduced the officers and outlined the purpose of the consultation meeting, emphasising that this is an opportunity to comment on the proposal and to seek clarification on points of detail. He stated that the consultation will be meaningful and informed, and he acknowledged that the proposal will inevitably be a cause of anxiety to staff given the uncertainty over job security.

3. AE explained the proposal being consulted upon and noted that he expects to receive counter proposals as part of the consultation process.
4. AT urged staff to read and submit their comments on the proposal, either as individuals or collectively. Staff comments will help officers test the soundness of the proposal. An assurance was given that alternative proposals would be given proper consideration.
5. AT explained that, subject to the outcome of consultation, it is likely that a report on the proposal will be considered by Members during March. However, a date for the report is not fixed to allow for detailed consideration of alternative options.
6. AT outlined the Council's Strategic School Improvement Programme and the reasoning behind the current proposal for Cymer Afan Comprehensive School.

Comments/queries & responses

7. **Staff comment/query:** the rationale for constructing Ysgol Cwm Brombil with sufficient pupil places to accommodate pupils from the upper Afan Valley was queried.

Officer response: Planning school places is not an exact science and forecasting is an estimation based on available information. An analysis of pupils living in the catchment area of the new school who could claim a place there together with projected growth suggested that the school needs to be larger than the pupil roll the existing primary and secondary schools. There are also efficiencies to be gained in building large schools and experience has shown that new build schools attract additional pupils.

8. **Staff comment/query:** If (the above) is the case what happens if those places are claimed as anticipated?

Officer response: the admission arrangements give priority to catchment area pupils and the upper Afan Valley would be part of Ysgol Cwm Brombil's designated catchment area.

9. **Staff comment/query:** unlike the transfer of pupils to Ysgol Bae Baglan when all three secondary school closed at the same time, the pupils of the upper Afan Valley will be disadvantaged as they will transfer to the new school one year later than the Dyffryn School pupils. This suggests poor planning and preparation.

Officer response: should the proposal be implemented then arrangements will need to be put in place between the schools to successfully manage the transition. A September 2019 start date allows time for this to be planned. Ideally, the consultation over the proposal for the upper Afan Valley and the development of Ysgol Cwm Brombil would have been concurrent. Notwithstanding the excellent work being undertaken by staff in maintaining standards, this proposal presents an opportunity for pupils from the upper Afan Valley to experience and benefit from a 21st century school environment.

10. **Staff comment/query:** concerns were raised over the proposal's impact on employment in the upper Afan Valley, the proposal does not accord with the five cross cutting themes in the Council's Single Integrated Plan:

- *Children and Young People in Neath Port Talbot are physically and emotionally healthy; Adults of working age in Neath Port Talbot physically and emotionally healthy; and Older People in Neath Port Talbot are independent and enjoy a good quality of life;*
- *People in Neath Port Talbot "feel safe and are safe";*
- *Neath Port Talbot's communities and environment are sustainable;*
- *Neath Port Talbot has a strong and prosperous economy leading to reduced poverty;*
- *People in Neath Port Talbot fulfil their learning potential.*

11. **Staff comment/query:** the school is the main employer in the area and closing the school will result in job losses. Added to which, public transport services are being cut and the travel time journey for pupils will be at least 8 hrs per week.

Officer response: the proposed travel time is not unusual across Wales and there are schools within NPT for which pupils have similar travel times. The Council will be working hard to protect jobs and has a good track record on redeployment.

12. **Staff comment/query:** carlessness in the upper Afan Valley is a barrier to pupils from the upper Afan Valley taking part in extra-curricular activities at Ysgol Cwm Brombil.

Officer response: schools manage extra-curricular activities in a variety of ways, not all such activities take place after school, some take place during the school day. Schools within NPT whose pupils receive school transport manage to engage their pupils in after school activities and ensure their safe return home afterwards.

13. **Staff comment/query:** lack of social mobility and employment opportunities are significant issues in the upper Afan Valley and investment is need to maintain the communities. Estate agents have reported that house prices have dropped since the proposal was announced. Implementing the proposal will exacerbate the issues of poverty and affect the viability of the communities.

14. **Staff comment/query:** the proposed closure of the school will undermine the good work that's ongoing to bring about improvements in a deprived area. The school provides a nurturing role that is invaluable to an area like the upper Afan Valley and investment is needed to develop lifelong learning provision.

15. **Staff comment/query:** academic research has shown that lengthy travel times to school are detrimental to pupil's well-being and increases the likelihood of mental health issues developing.

Officer response: request that the research cited is shared with officers of the Council, consideration of which will be part of the response to consultation. Emotional well-being is an area of which the Council is sensitive. As part of the consultation process, the views of pupils are being sought.

16. **Staff comment/query:** concern was raised at the management of children who take ill at school given the distance between home and Ysgol Cwm Brombil, the difficulty presented by public transport and carelessness in the upper Afan Valley.

Officer response: flashpoints during the school day have to be managed and schools in similar positions currently manage those situations.

17. **Staff comment/query:** difficulties relating to transport are a prime concern. That concern does not exist whilst Cymer Afan Comprehensive school remains open.

18. **Staff comment/query:** it is possible that pupils could be dispersed across three schools which would be disruptive to peer group relationships and community cohesion.

Officer response: parents have the right to seek admission of their child to a school of their choice and are free to exercise that choice. The Council is required to provide assistance with home to school transport to the nearest suitable school. Under the proposal the Council will also provide assistance with transport to Ysgol Cwm Brombil although this is not the nearest suitable school. Assistance with transport will not necessarily be provided to Cefn Saeson Comprehensive school.

19. **Staff comment/query:** it is possible that pupils could transfer from the upper Afan Valley primary schools to one of three secondary schools which would cause confusion and make transition arrangements operationally very difficult to manage compared to the current procedures within the federation which are extremely effective.

Officer response: the Council would wish all pupils to transfer to Ysgol Cwm Brombil, this would support effective transition as the primary schools in the upper Afan Valley would be partners with the new school. If parents chose otherwise the situation would have to be managed as it is in many other schools within NPT.

20. **Staff comment/query:** this proposal is a cost cutting exercise

Officer response: all efficiency savings and capital receipts resulting from the proposal will be retained within the education budget for the benefit of pupils within NPT.

21. **Staff comment/query:** the proposed Northern Powerhouse Developments adventure resort proposal presents a unique opportunity to promote the upper Afan Valley and attract investment and inward migration both of which will be lost if there is no secondary school locally available. The proposed leisure development should be explored as a source of funding for the building of a new school. This development would also increase social mobility within the area

Officer response: an update on the Northern Powerhouse Developments' project will be sought and its impact on the proposal considered.

22. **Staff comment/query:** concern expressed about the future of primary education in the upper Afan Valley and the future of the federation.

Officer response: there are no plans currently to remove primary education from the upper Afan Valley and the proposal does not decrease the benefits to the primary schools of remaining within a federation.

23. **Staff comment/query:** Given that money has been secured for a new build at Cefn Saeson Comprehensive school, a better plan would be to consult on the closure of Cymer Afan Comprehensive school within that new build proposal. This would mean that all pupils would be starting at the same time and not disadvantaged by staggered start arrangements.

Officer response: this comment is noted for consideration but it would still result in the closure of Cymer Afan Comprehensive school.

24. **Staff comment/query:** currently there are excellent transition arrangements between Cymer Afan Comprehensive and the partner primary schools. This would be lost under this proposal.

Officer response: excellent transition arrangements exist within other schools which have developed similar enlightened and innovative examples of support for pupil transition.

25. **Staff comment/query:** there are high levels of additional learning needs amongst pupils in the upper Afan Valley which need the support of the nurturing environment provided by Cymer Afan Comprehensive school.

Officer response: the level of needs within the upper Afan valley is no greater than in other areas found within NPT.

26. **Staff comment/query:** will jobs at Ysgol Cwm Brombil be ring fenced for staff at Cymer Afan Comprehensive should the school close?

Officer response: the employment of staff at Ysgol Cwm Brombil is the responsibility of that school's governing body. The Council has developed agreement whereby schools in NPT can sign an employers' pledge whereby staff at risk of redundancy will be given consideration for vacant posts.

27. **Union representative comment:** The Council has a good track record of working with unions and employees to secure the redeployment of staff. The unions are working with the Council in negotiating schemes for voluntary redundancy.

Officer response: where staff wish to continue in employment the Council will work hard to facilitate this. Similarly, where staff wish to explore other employment opportunities, the Council will seek to support staff where possible.

28. **Union representative comment:** this proposal will detrimentally impact of the Council's ability to deliver on its responsibilities under the Future Generations Act.

Officer response: the proposal will deliver a sustainable education provision for pupils. The community impact assessment identifies the

arrangements that can be made to mitigate any impact the proposal has on community provision.

29. **Union representative comment:** concern that the past record will give no reassurance on this occasion as very few jobs will become available at Ysgol Cwm Brombil; most will have been allocated prior to its opening. This will be especially the case with responsibility post holders. It would have been better if both proposals could have been developed concurrently. Linking the proposal to the new build plans for Cefn Saeson Comprehensive schools would provide greater opportunity for staff redeployment.

Officer response: as a consequence of the proposal, increased pupil numbers attending Ysgol Cwm Brombil should result in additional staff being required. The number of posts will depend in part on the number of pupils transferring to the new school. The Council will be actively encouraging the governing body of Ysgol Cwm Brombil to implement the employers' pledge. It is also the case that experience of previous school reorganisation has shown that some staff take the opportunity to pursue other careers and interests. Staff in the federation of schools in the upper Afan Valley are highly regarded which will assist with redeployment prospects. The Council provides 3 year pay protection for teaching staff and 12 mths for support staff.

30. **Staff comment/query:** An apology should be given to the staff for not informing them of the proposal. They first heard of the plans via social media.

Officer comment: the process being followed is determined by the Council's committee processes and the Welsh Government's School Organisation Code both of which are being adhered to.

31. **Staff comment/query:** the preferred option of the federation is to maintain the secondary school and the four primary schools in the upper Afan Valley and, to achieve that outcome, staff wish to work with the Council to develop a viable alternative to the current proposal.

Officer comment: alternative options brought forward a result of consultation will be fully explored.

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of the meeting with federated governing body held at 5.30 p.m.
on Wednesday, 17th January 2018 at Cymer Afan Comprehensive School

Present: Aled Evans (AE), *Director of Education, ELLLS*
Andrew Thomas (AT), *Head of Transformation, ELLLS*
Rhiannon Crowhurst (RC), *Strategic School Improvement
Programme, ELLLS*
Richard Gordon (RG), *Strategic School Improvement
Programme, ELLLS*
Amy Hutchings (AH), *Human Resource Officer, CHEX*
Maureen Treharne (MT), *Human Resource Officer, CHEX*

Mairwen Goodridge (MG), *Chair of Governors (Federation of
schools of the upper Afan Valley)*
Governors (Federation of schools of the upper Afan Valley)

Cedric Burden (CB), *Head Teacher (Temporary)*

Welcome introduction:

2. MG welcomed governors and officers to the school

The proposal:

3. AE introduced the officers and outlined the purpose of the consultation meeting, emphasising that this is an opportunity to comment on the proposal and to seek clarification on points of detail. He acknowledged that the proposal will inevitably be a cause of anxiety to staff given the uncertainty over job security.
4. AE explained the proposal being consulted upon and mentioned that Cymer Afan Comprehensive school is a small school in terms of pupils numbers and pupils in the upper Afan Valley have an opportunity to

receive their education in a 21st Century school environment at Ysgol Cwm Brombil.

5. AT explained the consultation process and stated that the consultation will be meaningful and the process is an opportunity to shape the proposal. He gave an undertaking to explore alternative proposals submitted as part of the consultation. The timetable for the process was outlined although this would be shaped by the responses received. The role of elected Members in the decision making process was explained and the importance of submitting their comments was emphasised.
6. AT outlined the Council's Strategic School Improvement Programme and the reasoning behind the current proposal for Cymer Afan Comprehensive School and commented that the proposed implementation date of September 2019 aids planning for change. He stated that the focus was on providing the best educational opportunities for young people.
7. MG stated that the governors and staff have the right view on the matter of what's best for the young people and that officers have got it wrong.
8. AT suggested that the federation of primary schools should continue.

Comments/queries & responses

9. **Governor comment/query:** the consultation document should be on the Council's consultation portal and not on the SSIP webpage.

Officer response: the consultation is localised with a defined audience which has been targeted with the relevant information. Using the search facility on the Council's website with key words such as 'consultation', 'Cymer', 'Afan', will link the search to the consultation document and supporting documentation. The consultation follows the procedures required by the Welsh Government's School Organisation Code which, by way of information, does not require that face-to-face meetings are held.

10. **Governor comment/query:** the consultation document contains jargon and a great deal of complicated detail that makes the document difficult for some stakeholders to access.

Officer response: the content of the consultation document is determined in part by the requirements of the Welsh Government's School Organisation Code. As a consultation document it also needs to meet the information requirements of a wide range of stakeholders. In preparing the document, the unnecessary use of technical terms has been considered and, where identified, jargon has been removed. A simplified version for pupils has been prepared.

11. **Governor comment/query:** the upper Afan Valley school community needed convincing that federation was the way forward in order to retain education in the area. The proposal to close the secondary school compromises the position of those governors who persuaded the community to adopt the federation model.
12. **Governor comment/query:** concern that schools within the federation are considering leaving the federation and reverting to separate school status.

Officer response: the federation offers economies and financial savings that allow the upper Afan Valley schools to remain viable. Relying on individual budget shares will make it extremely difficult for some of the upper Afan Valley schools to continue to operate. Even without a secondary school, there are benefits to maintaining a federated arrangement for the primary schools.

13. **Governor comment/query:** concern was expressed at the arrangements for informing staff of the proposal who first heard of the plans via social media. An apology to staff was requested as this has caused staff unnecessary stress.

Officer comment: the process being followed is determined by the Council's committee processes and the Welsh Government's School Organisation Code both of which are being adhered to.

14. **Governor comment/query:** the pupils will not attend Ysgol Cwm Brombil; the Council has misunderstood the view of the people who are proud to be part of the upper Afan Valley community. Some parents have indicated that should this proposal proceed they will remove their children from

secondary education and make arrangements for them to be home educated. This proposal does not improve the well-being of pupils but increases anxiety and stress levels particularly with the lengthy daily journey times.

15. **Governor comment/query:** parent governor comments that parents do not wish for their children to be travelling on a bus for 45 mins.

Officer response: it is noted that there are contradictory 'trial-run' journey times for home to school travel and these will be examined further in order to inform the consultation process. Ensuring arrangements support pupil well-being is a concern of officers too.

16. **Governor comment/query:** the start time of Ysgol Cwm Brombil will affect the length of day for pupils with a long journey to and from the school. They will be leaving home and returning in the dark.

Officer response: the start and finish times of Ysgol Cwm Brombil have yet to be determined by the school governors.

17. **Governor comment/query:** transition between primary and secondary education is excellent and this proposal undermines that process.

Officer response: excellent transition arrangements exist within other schools which have developed similar enlightened and innovative examples of support for pupil transition.

18. **Governor comment/query:** concern was expressed that, although 21st century facilities will be available at Ysgol Cwm Brombil, pupils from the upper Afan Valley will not necessarily be able to access these because travel time and distance would impact on the ability to participate in extra-curricular activities. There was also a concern that class sizes would increase compared to those at Cymer Afan Comprehensive school.

Officer response: Ysgol Cwm Brombil will be funded for the number of pupils on roll in line with other schools of its size. These schools successfully deliver the curriculum and provide a full range of educational

opportunities to pupils, including ensuring access to extra-curricular activities.

19. **Governor comment/query:** a more acceptable option would be to build a new school in the upper Afan Valley as this would attract more people to the area, including more children and young people. The clean air and countryside of the upper Afan Valley are attributes the Council should be exploiting and a new school would be seen as a commitment the future of the upper Afan Valley communities.

20. **Governor comment/query:** in order to maintain education in the upper Afan Valley and achieve the pupil numbers required by the Council, a preferred option would be to provide education at Cymer Afan Comprehensive school for pupils who would otherwise receive their education at Cefn Saeson Comprehensive school.

21. **Governor comment/query:** the preferred choice for the upper Afan Valley would be the status quo position. A new build 3-16 school on one site would be the next preferred option.

Officer response: full consideration will be given to alternative proposals, including a costed 3-16 option. The Northern Powerhouse Developments proposal for the area will also be given due consideration.

22. **Governor comment/query:** clarification was sought over home to school transport entitlements.

Officer response: assistance with home to school travel would be available to eligible pupils attending Maesteg Comp. school as it is the nearest suitable school to the upper Afan Valley. Assistance with home to school travel will also be provided to eligible pupils attending Ysgol Cwm Brombil as it the Council's designated receiving school. Assistance with home to school travel will not be available to Cefn Saeson Comp. school unless Maesteg Comp. school is full and has no capacity to admit pupils from the upper Afan Valley.

23. **Governor comment/query:** there are high levels of additional learning needs and free school meal take-up at Cymer Comprehensive school.

The small school, nurturing environment provides the support that these pupils need and which they would not get elsewhere.

Officer response: high levels of additional learning needs and free school meal take-up are not unique to the upper Afan Valley. There are other areas of the county borough with higher levels of need than is currently the case at Cymer Afan Comprehensive school.

24. **Governor comment/query:** concern that withdrawal of public transport to the villages of Glynorrwg and Abercregan will mean that pupils will not be able to access extra-curricular activities at Ysgol Cwm Brombil.

Officer response: the withdrawal of public transport services will impact on Cymer Afan Comp. as the transport difficulties are between Cymmer and Glynorrwg and Abercregan. Services between Port Talbot and Cymmer are not affected. It is noted that the school's minibus is used to transport pupils to their homes following participation in after school activities. Similarly, it would be expected that the leadership of Ysgol Cwm Brombil will make suitable arrangements to support access to after school activities.

25. **Governor comment/query:** the timing of the proposal means that Ysgol Cwm Brombil will be open and its governance arrangements established before Cymer Afan Comp. school closes. As such the upper Afan Valley will not have a voice on that school's governing body and the pupils transferring there from Cymer Afan Comp. school will not be represented.

Officer response: if the proposal is approved, representation of the upper Afan Valley on the governing body would need to be organised. The rules around governance will facilitate this.

26. **Governor comment/query:** the children of the valleys are different to other children, they are the heart of the community. If they have to leave the upper Afan Valley and the school closes they will lose their sense of belonging to the area and the upper Afan Valley will be a less attractive place to live. The Council needs to give its full support to the upper Afan Valley in order to realise its potential as a place for living and learning.

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of the meeting with the parents/carers held at 5.00 p.m. on
Thursday, 18th January 2018 at Cymer Afan Comprehensive School

Present: Aled Evans (AE), *Director of Education, ELLLS*
Andrew Thomas (AT), *Head of Transformation, ELLLS*
Rhiannon Crowhurst (RC), *Strategic School Improvement
Programme, ELLLS*
Richard Gordon (RG), *Strategic School Improvement
Programme, ELLLS*
Brendan Griffiths (BG), *Passenger Transport ENVR*

Cedric Burden (CB), *Head Teacher (Temporary)*

Parents of pupils attending schools within the federation
Pupils

Welcome introduction:

1. CB welcomed governors and officers to the school and announced emergency evacuation procedures.

The proposal:

2. AE introduced the officers and outlined the purpose of the consultation meeting, emphasising that this is an opportunity to comment on the proposal and to seek clarification on points of detail. He stated that the consultation will be meaningful and recognised that the proposal will inevitably be a cause of anxiety to parents and pupils. He acknowledged that parents may have already formed strong views on the proposal.
3. AE explained the proposal being consulted upon and noted that he expects to receive counter proposals as part of the consultation process. He stated that Cymer Afan Comprehensive is one of the

smallest secondary schools in Wales and the proposal offers the opportunity for pupils from the upper Afan Valley to experience a 21st century school environment at Ysgol Cwm Brombil.

4. AT urged parents to read the consultation document and to submit their comments on the proposal as these would be read by the Members of the Council and would help inform any decision they take.

5. **Comments/queries & responses**

6. **Parental comment/query:** the concept of a 21st century school facility being better than the existing provision at Cymer Afan Comp. school was challenged. It was held that Cymer Afan Comp. school provided 21st century education and was the best in the area.

Officer response: standards at Cymer Afan Comp. school were not the reason for bringing forward this proposal. Providing secondary education to a small number of pupils in an out dated facility was not ideal and there were better ways of supporting pupils to realise their aspirations and capabilities.

7. **Parental comment/query:** parents expressed cynicism about the consultation process believing their comments would not be reported or read by Members.

Officer response: the committee process within the Council is open to the public and is transparent in the way it is conducted. All responses to the consultation will be made available for Members to read and each point raised by consultees will be reported in a summary of responses. This will be available in a consultation report which will form part of the report to Members and will be available to the public.

8. **Parental comment/query:** it is believed that regardless of the consultation exercise the Council is going to close Cymer Afan Comp. school.

Officer response: the proposal is still at the consultation stage and no decision has yet been taken.

9. **Parental comment/query:** requested the amount being spent on Ysgol Cwm Brombil.

Officer response: the cost of Ysgol Cwm Brombil is estimated at £31m.

10. **Parental comment/query:** concern was expressed at the travel time and distance for young children, particularly those with anxiety issues. They would be too afraid and too small to manage the journey. They currently feel fully supported at Cymer Afan Comp. school.

Officer response: excellent support for pupil well-being is available at other NPT schools who are experienced at managing pupils with concerns and anxieties.

11. **Parental comment/query:** the amount of backlog maintenance at Cymer Afan Comp. school was challenged. It was held that the state of the building was the result of poor management and a lack of investment by the Council in dealing with the maintenance issues. Parents queried why some of the £31m set aside for Ysgol Cwm Brombil could not be spent on repairing Cymer Afan Comp. school.

Officer response: the Council has a limited budget for capital repairs which will not address the £100m backlog maintenance costs for schools within NPT. The money for Ysgol Cwm Brombil comes from a 21st century school fund which is specifically for new build and major refurbishment projects, not repair and maintenance. No longer are sufficient amounts of public money available for piecemeal repair and maintenance schemes.

12. **Parental comment/query:** parents are not opposed to change but queried why a new 21st century secondary school could not be built in the upper Afan Valley. Why are Cymer Afan Comp. school pupils expected to travel to Margam rather than build a 'super school' in the upper Afan Valley? To make the secondary pupil numbers more viable, an alternative option would be to transport Cefn Saeson Comp. school pupils to a new build school in the upper Afan Valley

13. **Parental comment/query:** how has the Council managed to secure funding for Cefn Saeson Comp. school when it argues it cannot for Cymer Afan Comp.?

Officer response: a proposal for a new build school will be fully considered and analysed but with so few secondary age pupils in the upper Afan Valley it is difficult to see how a sound business case could be developed to justify the expenditure needed. Nevertheless, this option will be properly analysed and alternative proposals explored. Ysgol Cwm Brombil is currently under construction and will be available from the autumn term 2018 to provide pupils with a 21st century school learning environment.

14. **Parental comment/query:** the Council should build a new 3-16 school in the upper Afan Valley given its policy on 'all-through' schools.

Officer response: the 3-16 model for new school builds is not suitable in all situations. The Council has used this model only where it is considered to be appropriate.

15. **Parental comment/query:** some pupils in Year 5 & Year 6 attend the POD at Cymer Afan Comp. school. This support service could not be provided at Ysgol Cwm Brombil.

Officer response: should the proposal be implemented then arrangements will need to be put in place to deliver the support required by primary age pupils.

16. **Parental comment/query:** the secondary school has been led by four head teachers in the past few years and this is not good for stability. Has this been a ploy of the Council to undermine the school? The upper Afan Valley needs a high number of teachers to support the learning and well-being needs of the pupils. This is why standards are so good.

Officer response: it is the case that there will be fewer teachers per pupil at Ysgol Cwm Brombil than is presently the case at Cymer Afan

Comp. school. This is because the schools in the federation including the secondary school are funded at a higher rate. The secondary school receives approx. £7000 per pupil. The average for the other secondary schools in NPT is approx. £4500 including schools serving areas with similar or even high levels of deprivation than the upper Afan Valley. The extra money is because the secondary school is a small school. The larger number of pupils at other schools mean that they are better placed to deliver teaching and learning at a lower cost. These schools would be able to deliver education to an even higher standard if the money was shared more equitably.

17. **Parental comment/query:** the Council is penalising Cymer Afan Comp. school for being a small school rather than celebrating the value it adds to pupils' learning and well-being together with the benefit it brings to the community.

18. **Parental comment/query:** children are the heart of the community. If they have to leave the upper Afan Valley for their education they will lose their sense of belonging to the area. This proposal does nothing to protect the heritage of the valley.

19. **Parental comment/query:** under this proposal, what time does the Council expect children to leave home to catch the bus to school? Children will be leaving for school in the dark and returning in the dark. They will have to travel for at least 10hrs each week and will be away from their home for longer periods than working adults. Added to which there is the concern of school buses breaking down and children being left stranded.

Officer response: the start and finish times of Ysgol Cwm Brombil have yet to be determined but such travel arrangements are not unusual at other schools within the county borough. School buses, as with other forms of transport, occasionally break down but pupils should not be left stranded. Any such incidents will be fully investigated.

20. **Parental comment/query:** this proposal does not improve the well-being of pupils but increases anxiety and stress levels particularly with

the lengthy daily journey times. The children will not be able to handle the change of school and new arrangements.

Officer response: the well-being of pupils is a concern of the Council too and schools have experience in supporting pupils with anxieties and concerns.

21. **Parental comment/query:** difficulties were perceived in managing children who take ill at school. Parents without cars would not be able to readily travel to the school as the public bus service is neither direct nor frequent.

Officer response: pupil sickness during the school day has to be managed and schools are experienced at managing those situations.

22. **Parental comment/query:** will the proposal be the subject of an equality impact assessment.

Officer response: the proposal will be equality impact assessed at the appropriate stages of the process.

23. **Parental comment/query:** why is Ysgol Cwm Brombil being built oversize and why is it intended to admit pupils a year after it opens? The vertical curriculum at Cymer Afan Comp. school is different to others school and this will present a problem, as will ensuring pupils sitting external exams are not disadvantaged. Children's education will suffer, particularly those in the final year of school. This could be made worse if teachers leave the school before it closes.

Officer response: there are both advantages and disadvantages in transferring pupils to Ysgol Cwm Brombil a year after it opens. Starting a year later will give time for the school to carefully plan for the arrival of the new intake, including managing the different curriculum arrangements and ensuring those sitting GCSE examinations are fully supported. As for teachers leaving before September 2019, this is a situation that will need to be carefully monitored and managed.

24. **Parental comment/query:** children choosing to attend Maesteg Comp. rather than Ysgol Cwm Brombil will have to pay for transport. Parents in the upper Afan Valley will not send their children to Ysgol Cwm Brombil.

Officer response: parents can chose to send their child to whichever school they wish provided there is room. For children wishing to attend Maesteg Comp. there would be no charge for home to school travel for eligible pupils as it is the nearest suitable school to the upper Afan Valley. There would be no charge also for home to school travel for eligible pupils attending Ysgol Cwm Brombil as it is the Council's proposed receiving school. However, there will be a charge for home to school travel to Cefn Saeson Comp. school unless Maesteg Comp. school is full.

25. **Parental comment/query:** pupils travelling on the school bus to Ysgol Cwm Brombil would be unsafe as there would be no adult supervision. Can the council guarantee a child's safety and that children will not be bullied?

Officer response: it is not usual to provide adult supervision on school buses taking secondary age pupils to school. This is common practice across other schools where pupils travel to school by bus. However, the concern over the travel to school is noted by officers and will be fully considered as part of the consultation process.

26. **Parental comment/query:** problems with transport will mean that pupils may not arrive at school on time or even miss the whole day which will result in pupils and parents being penalised for late arrival or for not attending school.

Officer response: no pupil or parents will be penalised for not attending school as a result of problems with the Council's home to school transport arrangements. This will be made explicit in the response to consultation

27. **Parental comment/query:** has not the Council explored the opportunities for a new school build funded by the Northern Powerhouse proposal for the upper Afan Valley.

Officer response: the Council can use agreements with developers to support schemes that benefit the community, including funding schools and this will be investigated as part of the consultation process.

28. **Pupil comment/query:** there is concern about travelling to and from school as the upper Afan Valley is prone to icy roads and snow. Although the school has been closed only for a few days because of bad weather there is no mention in the consultation document about the times when the school has had to close early because of snow. Getting pupils back from Margam when the weather is bad is a real concern

Officer response: managing inclement weather is something that schools are experienced at doing.

29. **Pupil comment/query:** there is disappointment that staff were not directly informed of the proposal by the Council rather than hearing about it on social media. An apology to staff would be appropriate.

Officer response: the arrangements followed the procedural process required of the Council.

30. **Parental and pupil comment/query:** answers are not being given to the questions. Officers are responding to questions by saying everything will be considered as part of the consultation. Parents want answers.

Officer response: this is about consultation. No decision has been taken at this stage. Members will take that decision when all the necessary information, including views expressed at consultation, has been gathered.

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of meetings held with pupil representatives (Years 5 – 11) from the Federated Schools of the Upper Afan Valley on 26th January 2018.

Summary of comments and queries:

1. **Pupil comment/query:** We will have a travel time of up to two hours a day, meaning a 40 hour week for us, more than most adults - we will be too exhausted to do homework or outside school activities if we have to travel for those hours. If we have bad weather how will we get to school? Will our parents be fined if we aren't able to attend because buses are cancelled or if the bus is late? What will happen if we miss the bus – how will we get to school? What will happen if we are ill and need to go home? How will we be able to get home if we stay for after school activities? How will we be able to attend out of school activities which may start early – we won't be home in time? Will we be safe travelling on a bus? What about bullying?

Officer Response: A great number of pupils all across Neath Port Talbot travel on buses to get to school without difficulty and it is not expected that this proposal would be any different. The new school would be expected to make arrangements for pupils to be able to attend after school activities, as happens in other schools, and to ensure that all pupils have the chance to take part if they wish. If buses are cancelled because of bad weather, or if there is some other problem which prevents buses arriving on time then parents of pupils affected will not be penalised; it is very important to arrive in time to catch the bus as this is your/your parents responsibility – in the same way that it is your/your parents responsibility to make sure you attend school on time now. Should the situation arise where pupils are unwell during the day and need to go home it is expected that the new school will have a system in place for managing this as is the case in other schools in Neath Port Talbot currently. All checks will be taken to make sure that buses carrying pupils to school are safe and meet all regulations;

it is the responsibility of the school to ensure that bullying whether on a bus or in the school building or grounds, is dealt with according to the approved policies and practices – bullying is not acceptable in any situation.

2. **Pupil comment/query:** Cymer Afan Comprehensive is small school where all staff know pupils far better than they would in a larger school – how can it be better for us to go to a larger school? What will happen to our friendship groups – will we all be split up? We won't make such good progress in a larger school; staff won't have enough time for us.

Officer Response: There is some evidence to suggest that in schools with more pupils children often benefit from larger friendship groups and have greater opportunities to make a wider circle of friends with different life experiences. If the proposal progresses it will be very important to make sure that there is good communication between this school and the new Margam school so that staff know who your friends are and are able to make sure you are supported through the move. It will also be important for the new school to know all about you and to make sure they are doing everything possible to make sure you can make as much progress as you are now.

3. **Pupil comment/query:** How will the new school be able to help children who have difficulty learning? What help can they give to children who are anxious or who have ADHD or ASD? Some pupils have settled here because they get extra support – how will a bigger school be able to give them this, they will have too many pupils?

Officer Response: All schools have a duty to support children with additional learning needs and if the proposal goes ahead then this school and the new school will need to make sure that there is good communication between them so that all needs are understood. It is recognised that some children will find a change difficult and again they should have support to help them settle in. In other situations where schools have closed and there have been concerns that children will be unhappy or not have their needs met because of being a larger school, it has been found that children have settled well with the right help early in

the process and have gone on to be very happy and to make good progress.

4. **Pupil comment/query:** Why should we have to travel to a more polluted school in Margam? This is dangerous for our health.

Officer Response: The new school in Margam is being built on land where a comprehensive and primary school are already operating and there is no evidence to suggest that those children who attend are not healthy or are being affected by pollution.

5. **Pupil comment/query:** What will happen to the staff who work here, will they have jobs in the school in Margam? If they leave this school early (before it closes) our education will be disrupted – we could have no teachers?

Officer Response: If the proposal goes ahead and Cymer Afan Comprehensive closes then the staff who are employed to work here will no longer have a job. However the Council have a good track record in helping people in these circumstances to either find new jobs at another school, or to leave education and work elsewhere, or retire from work – depending on the circumstances of the individual members of staff and what they would prefer to do. If the proposal progresses then the staff will have the opportunity to further discuss all the options available to them with officers. It is also possible that some staff may leave before the school closes – if this happens they will be replaced by other teachers as happens now, and while experience and expertise may be lost in some cases it should not mean that pupils are left without teachers or support staff.

6. **Pupil comment/query:** What does 21st century education mean? We have a 21st Century education in Cymer Afan Comprehensive School now. Buildings don't make a good school, we already have the resources we need. What will happen to all the resources we have here if the school closes?

21st century school is the term used to describe a school built in the 21st century – such as Ysgol Bae Baglan or the new school in Margam. This

means the school will be as up to date as it can be in terms of the type of materials used in construction, the way it is designed for learning and socialising, and the types of resources provided. It doesn't mean that the education provided will be different to any other school but research has shown that schools that operate in new buildings with up to date resources and facilities can have a significant positive impact on teaching and learning, and on standards attained. If the proposal is approved and this school closes then reusable resources will be reallocated to other Neath Port Talbot Schools as appropriate.

7. **Pupil comment/query:** Why can't we have a new school build here? Why don't you close Cefn Saeson and move the children from there to this school?

Officer Response: A new build for this area either a secondary or all through 3-16 school is something we have been asked to look at in more detail by staff and Governors of the school and we have agreed to do so. It is unlikely that we would close Cefn Saeson and move pupils to Cymer Afan as this school doesn't have enough space to accommodate the number of pupils attending Cefn Saeson currently.

8. **Pupil comment/query:** Why have you built the new school at Margam too big? If extra pupils not already in the schools 'claim a place' will there still be room for us? What if there isn't room?

Officer Response: The new school has been built to accommodate the pupils who currently attend Groes Primary school and Dyffryn School, and to also make sure there is enough room for those children who live in the catchment area currently but who attend other schools. Experience has shown that a new build school often attracts children from the local area who were attending other schools and it is important to make sure there is enough space for them as they can claim a place. If all those extra pupils attend, and if this proposal is approved and all Cymmer Afan Comprehensive school pupils also wish to attend then the Council and the school Governing Body will make sure they can all be accommodated. We won't know for sure how many pupils will want a place until nearer the time of opening.

9. **Pupil comment/query:** What happens if we decide to go to Maesteg – they have no room there!

Officer Response: Maesteg School has been consulted as part of this process and has indicated that spaces are available currently.

10. **Pupil comment/query:** We are part of a federation of schools and when we moved from our primary to this school it was made easier because we already knew the school, other children and the staff. This can't happen if we move to Margam – it will be too far and younger children won't have the opportunity for the good transition we had.

Officer Response: It is recognised that the work that has gone on between the secondary and the four primaries in the federation has been successful and many children have benefitted from the transition work that has taken place. However other secondary schools also work hard at transition and have good results and it would be expected that the good practice that has taken place here in previous years can be used to ensure that future transition into the new school at Margam can also be good.

11. **Pupil comment/query:** Why did you put the news on Facebook before we knew? If the decision is made to close our school will we be the first to know?

Officer Response: As the final decision will be made in a public meeting it would be very difficult to ensure that the school would hear about the decision before anyone else. When decisions are taken by the Council – such as the decision to consult on this proposal – members of the public and the press are able to attend and hear what is being discussed. This means that anyone present can share the information on Facebook, Twitter or through any other means of communication often before those involved know what has been decided.

12. **Pupil comment/query:** What about the adventure resort that is opening up in this area? If the school closes will the land be used for that? We will need this school if more people come to the area.

Officer Response: This proposal is not linked in any way to the adventure resort. It is possible that the resort may take a long time to be developed and the impact of this on the area may not be felt for a number of years.

13. **Pupil comment/query:** Year 8 and 9 are very important years, we will be half way through GCSEs – what arrangements will be made for us? We have a vertical curriculum – what will happen in YCB? Will we be disadvantaged?

Officer Response: If this proposal is approved and the school closes in 2019 the current Year 9 cohort will be Year 11, and the current Year 8 pupils will be in Year 10 - both year groups will be preparing for GCSEs. All steps will be taken to make sure that everything is in place for those pupils to ensure minimal disruption – and plans need to be put in place as early as possible so that both schools can work together to achieve this. Early discussions are vital so everyone involved can understand the implications of the vertical curriculum and possible impacts on pupils.

14. **Pupil comment/query:** Why do you want us to move a year after the new Margam School opens – we will be different to the other pupils? What about uniform? How will we make friends? Are we different? Will we be bullied?

Officer Response: There is no reason for delaying pupils move into the new school for a year other than the need to make sure there is enough time to ensure good plans and systems are in place for the transition to be as successful as possible. It is not because pupils from the upper Afan valley are different to those in Port Talbot or elsewhere. If the proposal is approved then it is expected that during the year 2018 -2019 work will take place to bring the two schools together, for staff to meet to discuss individual pupils and to work out any difficulties that may be identified. Part of that process will be making sure that pupils get to know each other and that work takes place to build positive relationships. The new school will have a new uniform which pupils currently attending Dyffryn and Groes will have to wear when they move in to the school in autumn term 2018, and this would be the same for pupils moving in at a later date.

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of the meeting with the temporary governing body of Ysgol Cwm Brombil held at 5.15 p.m. on Monday, 29th January 2018 at St David's Church Hall, Margam

Present: Aled Evans (AE), *Director of Education, ELLLS*
Andrew Thomas (AT), *Head of Transformation, ELLLS*
Richard Gordon (RG), *Strategic School Improvement Programme, ELLLS*

Mair John (MJ), *Chair of Governors, Temporary Governing Body of Ysgol Cwm Brombil*
Governors, *Temporary Governing Body of Ysgol Cwm Brombil*

Introduction:

1. AE thanked the governors for the opportunity to meet with them to discuss the proposal for the upper Afan Valley which directly impacts Ysgol Cwm Brombil. He pointed out that this was an opportunity for governors to raise matters needing clarification and for officers to hear the views of governors on the Council's proposal to close Cymer Afan Comprehensive school and to provide for pupils from the upper Afan Valley at Ysgol Cwm Brombil.

The proposal:

2. AT introduced explained the consultation process and stated that the consultation will be meaningful and that the process is an opportunity to shape the proposal. The timetable for the process was outlined although this would be determined by the responses received. The role of elected members in the decision making process was explained as was the importance of governors, either collectively or individually, submitting their comments in writing.

3. AT explained that the proposed date for transfer of pupils to Ysgol Cwm Brombil was 1st September 2019. He outlined some of the advantages and disadvantages of this date in managing the transfer. In particular, he highlighted the issues for staff. Should a decision be taken to implement the proposal then some Cymer Afan Comprehensive school staff may seek alternative employment before the school closes which would present a staff management problem for the school. It is also the case that staff at Cymer Afan Comprehensive school will be disadvantaged as the majority of posts at Ysgol Cwm Brombil will be filled before Cymer Afan Comprehensive school closes. He also pointed out that pupils from the upper Afan Valley would be joining the school a year after it had been opened to pupils from the existing catchment area.
4. AT explained the importance of well-planned transition for the pupils of the upper Afan Valley and referred to the excellent work of Ysgol Bae Baglan as an example of successful integration of separate school communities.
5. AT mentioned that the distance between the upper Afan Valley and Margam, and the associated travel time between both, was a matter of concern for the parents and pupils of that area. This was also seen to impact on the ability of pupils to access extra-curricular activities.

Comments/queries & responses

6. **Governor comment/query:** the role of members of the Council in the decision making process was raised.

Officer response: The Education, Skills and Culture Cabinet Board is the decision making body in relation to this proposal although that Cabinet Board's decision will be formally reported to all elected members at an appropriate meeting of the Council.

7. **Governor comment/query:** the travel time and distance was raised as a matter of concern.

Officer response: it is noted that there are contradictory trial journey times for home to school travel and these will be looked into in order to inform the consultation process. An additional trial run is being undertaken to

clarify this matter. It is to be noted that pupils travel similar long distances to other schools within and without the County Borough.

8. **Governor comment/query:** the governors were mindful of setting a start time for Ysgol Cwm Brombil and have deferred a decision on this matter whilst consultation is ongoing.

Officer response: it is to be noted that other schools successfully manage their school day to accommodate pupils travelling to and from school from nearby and far away locations, including ensuring access to extra-curricular activities. This should not present as an insurmountable issue to Ysgol Cwm Brombil.

9. **Governor comment/query:** the opportunity to access 21st century school facilities should be an attraction to parents of the upper Afan Valley and Ysgol Cwm Brombil will be able to offer this experience. The governors will welcome pupils and parents of the upper Afan Valley as full members of the school community.

Officer response: the full support of the governors and staff will be needed to ensure successful transition arrangements are put in place. Should the proposal be implemented then the upper Afan Valley would form part of the area served by Ysgol Cwm Brombil, i.e. the catchment area for the school. In this respect the upper Afan Valley will have equal status to all other areas served by the school and planning and delivery will need to reflect this position. In this regard, the positive approach of the governors of Ysgol Cwm Brombil expressed in this consultation meeting is heartening to note.

**Consultation on the future of secondary education
in the upper Afan Valley**

Officer notes of the meeting with the community held at 6.00 p.m. on Monday
5th February 2018 at Cymer Afan Comprehensive School

Present: Cllr Rob Jones, (RJ) Leader of the Council
Steven Phillips (SP), Chief Executive
Aled Evans (AE), *Director of Education, ELLLS*
Andrew Thomas (AT), *Head of Transformation, ELLLS*
Richard Gordon (RG), *Strategic School Improvement
Programme, ELLLS*

Other officers present: Roger Bowen; Nick Clark; Jon Betts
(responsible for managing microphones and speaker system)

Cedric Burden (CB), *Head Teacher (Temporary)*

Community of the upper Afan Valley and elected representatives

Welcome introduction:

1. CB welcomed everyone to the school and announced emergency evacuation procedures.
2. SP introduced himself, the Leader of the Council and the officers and then outlined the format of the meeting, stating that there would be an introduction by AE followed by questions from the floor. Given the number present, he would take only one question from each speaker initially.

The proposal:

3. AE outlined the purpose of the consultation meeting, emphasising that this is an opportunity to comment on the proposal and to seek clarification on points of detail. He stated that the consultation will be meaningful and recognised that the proposal will inevitably be a cause of

anxiety to parents, pupils and those within the wider community and acknowledged that those directly affected will have already formed strong views on the proposal.

4. AE explained the proposal being consulted upon and difficulties faced by a small school in delivering the full curriculum offer and referred to the greater opportunities available in a new build, 21st Century School setting with a larger pupil cohort and staff complement. He commented on the high quality of the staff at Cymer Afan Comprehensive school. He also commented that maintaining a small secondary school came at a high cost compared to other schools in the County Borough.
5. AT urged those present to read the consultation document and to submit their comments on the proposal as these would be read by the Members of the Council and would help inform any decision they take.

Comments/queries & responses

6. **Comment/query:** why hasn't the Council invested the money it receives in the Barnet formula in tackling deprivation in the upper Afan Valley?

Response: the Council has invested in the area. The reference to deprivation is not applicable to the Barnet Formula.

7. **Comment/query:** how can the Council be trusted with the safety of children in the upper Afan Valley when they allow pupils to carry knives in schools?

Response: the incident in question relates the wearing of a Kirpan by a pupil at another NPT school. The police have been fully involved in this matter. The Chief Inspector of Police has visited the school in question and is satisfied that no risk is posed in this instance.

8. **Comment/query:** why is the Council more interested in cost rather than quality?

Response: the Council is responsible for some 20,000 pupils in whose interest it has to act. The cost of providing secondary education in the

upper Afan Valley at £7000 per pupil compared to £4500 for the remaining pupils in the County Borough area is a matter which the Council has to carefully consider.

9. **Comment/query:** the travel time to Ysgol Cwm Brombil is felt to be too onerous

Response: pupils spend time travelling to school at present either walking or on buses. The journey to Ysgol Cwm Brombil would add approximately 25 mins each way to that home to school travel time. The impact of the journey will be further considered before a decision is taken.

10. **Comment/query:** there is a lack of investment by the Council in the upper Afan valley – no library, no swimming pool, no parks, no community centre.

Response: there is no denying that austerity measures have impacted upon the Council which has had to explore alternative means by which services can be made available within communities and the Council has been active in doing this such that services have not been lost to the community

11. **Comment/query:** why cannot we have a 21st century school in the upper Afan Valley?

Response: there is a problem in financing a new build school because of the small number of secondary age pupils involved, a number that is not forecast to increase significantly. A secondary school based on forecasted numbers will not justify the investment needed for a new 21st century school.

12. **Comment/query:** concern expressed about the safety of the route to Margam, particularly on icy roads.

13. **Comment/query:** what is the next highest 'per pupil' cost in NPT schools?

Response: speaker to leave details and a response will be provided.

14. **Comment/query:** how does the Council intend filling the empty spaces at Ysgol Cwm Brombil without upper Afan Valley pupils and how long before it closes if the numbers do not materialise?

Response: experience has shown that new build schools attract additional pupils. There is no concern that the school cannot be filled to capacity.

15. **Comment/query:** how can the high standards achieved by pupils at Cymer Afan Comprehensive school be maintained when the standards at Dyffryn School are not as good?

Response: standards at Dyffryn School are as good. In fact, two years ago Dyffryn achieved the best results in the County Borough.

16. **Comment/query:** pupils will not be able to take part in extra-curricular activities because of the travel involved between home and school.

Response: this is an issue that schools address through a range of means and local arrangements. Schools can organise many activities to take place during the school day. Some schools have set days for after school events and arrange buses to transport pupils. One Neath Port Talbot school organises 3 x buses a week to enable pupils to participate in extra-curricular activities.

17. **Comment/query:** pupils will be leaving in the dark and returning home in the dark. Children will have to get up by 7.00 a.m. What will the Council do to guarantee their safety in crossing the roads?

Response: such guarantees are not possible to give. But general road awareness and parental support is important in such situations.

18. **Comment/query:** the Council is focussing on saving money. Is this more important than the education of children?

Response: the reality is that education costs and needs to be funded. Therefore, money is important. A Council is responsible for ensuring best value in the delivery of education across all 20,000 children and young people.

19. **Comment/query:** the Council made retaining a swimming pool in the area as difficult as possible. Is the Council now doing the same with the school?

Response: despite the views held locally, the Council worked hard to secure a deal on the swimming pool. There are economic challenges facing the Valley, and elsewhere. As a Council we have to use the information available on which to base decisions and Cymer Afan Comprehensive is a school of 250 when it was built for 650.

20. **Comment/query:** a solution would be to bring more children to the upper Afan Valley

Response: all counter proposals will be looked at carefully.

21. **Comment/query:** this proposal does not support the well-being of pupils who will have to travel long distances to get to school, they will be tired and not able to benefit from the time at school. A secondary school is needed in the Valley. What will be the impact on the Valley when the school is taken away?

Response: no decision has been taken; it needs to be pointed out that there is no English-medium secondary school in the upper Swansea (Amman) valley nor in the upper Neath valley.

22. **Comment/query:** why not spend £3m to bring the school up to standard?

Response: the £3m refers to maintenance and repair. It's the cost of making the school warm, watertight and safe. It will not delivery a 21st Century school environment. It will still be an old school building.

23. **Comment/query:** why has the Council never implemented the 'umbrella' federated budget?

Response: the five schools in the upper Afan Valley benefit from being funded as separate schools, as all five budgets will contain the cost of a head teacher for example. The Federated Governing Body is able to pool those budgets and use the money as it sees fit, including employing only one head teacher and using the savings elsewhere. So the federation is funded in a way that is more generous than the funding it would receive as a single school.

24. **Comment/query:** what will be the cost of educating pupils at the new school in Margam?

Response: the budget for 2018 onwards has not yet been fixed but as an estimate it would be about £4500.

25. **Comment/query:** if the upper Afan Valley wins this battle, will the Council come back again and try and close the school?

Response: that will depend on the circumstances the future holds.

26. **Comment/query:** why is the Council investing heavily in Cefn Saeson Comprehensive school when results are not as good as Cymer Afan Comp.?

Response: apart from last year Cefn Saeson results have been good. It provides for over 600 pupils and the buildings need replacing because of their poor condition.

27. **Comment/query:** what about youth clubs?

Response: these can be provided elsewhere in the community

28. **Comment/query:** there is no proposal brought forward by the Council that has not been implemented, the Council has never changed its mind.

Response: the proposal brought forward for merging two primary schools in the Swansea valley is an example where the Council listened to responses of consultation and changed its plans.

29. **Comment/query:** because children will be taken out of the Valley for the education and late returning home from school, they will not be able to participate in locally organised events and the Valley children need to develop their talents.

Response: this is about how activities are organised; going to a school outside of the valley and participating in locally organised activities are not necessarily at odds with one another

30. **Comment/query:** as this is about saving money, when will the Council be asking us to pay for school transport?

Response: so long as the Welsh Government does not change the current rules, school transport will be paid for by the Council

31. **Comment/query:** has the land the school is on been sold to the Adventure Park developers?

Response: the school land has not been sold and this proposal for education is not connected to the Adventure Park proposal.

32. **Comment/query:** the Council has hidden this proposal from the people of the upper Afan Valley for the past 3 years. The consultation on the new school at Margam and this consultation should have been 'open' at the same time as this current process has not given the staff at Cymer Afan Comp. a chance to be involved in decisions about the Margam school. The consultation is not fair and should be thrown out.

Response: complex proposals need time to develop and there is hardly ever a perfect time to bring forward plans for change; these are matters determined by circumstances. If the clock could be turned back, things could have been done differently, but we cannot go back in time so the situation as it stands needs to be managed. This is the opportunity for

the upper Afan Valley to express its views on what is currently being proposed.

33. **Comment/query:** the Council could use its reserves and deprivation grants to sustain the school

Response: the Council has used its reserves to balance its budget in a financially difficult period for local government. Reserves can only be used once and decisions are a matter of achieving a balance of priorities. Money received to support initiatives to tackle deprivation are used for this purpose across the County Borough.

34. **Comment/query:** how will pupils from the upper Afan Valley be guaranteed a place at the new school?

Response: if this proposal is implemented that the catchment area for the new school would include Cymer Afan Comp. and pupils would get catchment area priority for places.

35. **Comment/query:** what will happen if a child is taken ill, parents without cars will not be able to fetch them or if they miss the bus?

Response: this is a situation that schools manage now on a daily basis. The school will have emergency contact numbers for parents and family and where necessary the school will arrange transport. How situations are managed will depend on the circumstances

36. **Comment/query:** suggest putting portakabins on the primary school site and providing for young secondary school pupils there with the 14 and 15 years moving to another secondary school.

Response: alternative proposals will be carefully considered.

37. **Comment/query:** 21st century education is about amazing teachers not just ipads. People choose to live here and there is a fantastic school. We would have to move if the school closes.

Response: no one is being expected to move home. There is an element of choice in where people live and a balance has to be struck about what services a Council can provide in an area.

38. **Comment/query:** will those who submit a written response get a personal reply?

Response: no, all responses will be considered and reported in the consultation report which the Council has to publish

39. **Comment/query:** has the Council considered the rights of the child

Response: before a decision is taken by Members the relevant impact assessments will be completed.

40. **Comment/query:** the report states that the Faith sector will be consulted but this has not happened.

Response: the consultation report has been circulated to both the Catholic and Church in Wales Diocesan education boards.

41. **Comment/query:** the air quality in Port Talbot is not good. In the upper Afan Valley, where children live, is a healthy environment.

Response: air quality is regularly measured and meets acceptable standards.

42. **Comment/query:** there a concerns over the way the pupil views were collected.

Response: the deputy Headteacher of Cymer Afan Comp. was present throughout.

43. **Comment/query:** the Council has not handled this process at all well and is taking no notice of what we have to say. Cymer Afan Comp. is the best school in Neath Port Talbot. This proposal is all about saving money. We need to stand up and challenge this proposal.

Estyn response to the proposal on the future of secondary education in the upper Afan Valley.

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia which deliver school improvement services to the schools within the proposal.

Introduction

The proposal by Neath and Port Talbot County Council is to close Cymer Afan Comprehensive School on 31st August 2019 and to make arrangements for pupils to attend the new all-aged school at Margam in a new, purpose built facility.

Summary

The proposal asserts reasonably that Cymer Afan Comprehensive School is a small school. It is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils. It is Estyn's view that overall the proposal is likely to at least maintain the standards of education and provision in the area.

Description and benefits

The proposer has given a clear rationale for the proposal's expected

benefits in relation to offering a well-resourced environment which is able to accommodate pupils from the upper Afan Valley.

The proposer notes appropriately the advantages of the proposal. This includes directly addressing the issue of unfilled places at Cymer Afan Comprehensive School. With the physical capacity to accommodate 641 pupils the school has a significant surplus capacity of 64% (412 places). Even at the forecasted high in 2021 there will still be 58% surplus capacity at the school. This is reflected further in the high 'per pupil' funding at Cymer Afan Comprehensive school which is significantly higher than the average for the Council's schools, a cost that has increased annually. According to the proposal, since 2015/16 'per pupil' funding at Cymer Afan Comprehensive School has exceeded the average for the Council's schools by nearly 60%. The proposer forecasts that the 'per pupil' costs at the new school at Margam, will be at or below the local authority average. Based on the local authority average alone there will be annual revenue saving of £2,635 per pupil. With 226 pupils currently on roll, the proposal notes that this equates to a total annual saving of £595k.

The proposer also notes that the number of pupils attending the upper Afan Valley federation, particularly at secondary level, has not increased since its establishment and its not forecast to increase significantly going forward. The provider argues that this brings into question the sustainability of 11-16 age provision given that there are other secondary schools within reasonable travelling distance, which could accommodate the pupils of the upper Afan Valley.

The proposal indicates that the current site is categorised as overall building condition C which means poor. The proposer asserts that elements of the building are exhibiting major defects and/or not operating as intended. In addition, the proposal affirms that revenue costs associated with maintaining a small secondary school are significantly higher than for those schools with greater pupil numbers. According to the proposer, closing Cymer Afan Comprehensive School will remove £3m of backlog maintenance and accessibility liabilities.

The proposer has identified suitably the disadvantages of the current proposal, which focuses on the impact on pupils and parents due to the

increase in journey time.

Additionally, this would result in an annual increase in travel costs of £76k for the authority. The pupils affected would be the current year 7, 8 and 9 pupils as well as year 5 and 6 pupils.

The proposer has recognised further possible risks to include resistance to change leading to lack of pupil, parent and staff support as well as staff anxiety about job security and job losses. The proposer notes clearly that should a decision be taken to close the school, staff with contracts attached to Cymer Afan Comprehensive School will be declared redundant.

The proposer also identifies that the removal of Cymer Afan Comprehensive School from the federation would also change the current federated structure and operational arrangements. However, this proposal would not have a significant effect on the present federated governing body. The federation could continue following the closure of Cymer Afan Comprehensive School, however, a revised structure and purpose would be needed.

In addition, it is also noted in the proposal that the closure would impact on the wider community with community provision and activities that have been developed over an extended period at the school site being displaced under this proposal and relocated from the school to alternative locations.

The cost of the £30m new build investment at the new school at Margam is not dependent on this proposal.

Educational aspects of the proposal

The proposer makes appropriate reference to the outcomes of the schools' most recent Estyn inspection in April 2015. It identifies correctly that both the current performance and the prospects for improvement were judged to be adequate. Estyn monitored the school and in November 2016 the school was judged to have made good progress in respect of the key issues for action.

The proposer also notes that the Estyn report refers to leadership and management at Cymer Afan Comprehensive School being adequate and

not having enough impact in ensuring good progress in indicators that include English and Maths. However, results at key stage 4 at Cymer Afan Comprehensive School have shown a steady improvement over three years in all key indicators with a significant rise in 2016. The school has experienced some instability in recent years with a number of changes in key leadership roles and recruitment of a permanent Headteacher has proven to be difficult.

The proposer also refers briefly to the schools' categorisation within the National School Categorisation System. In 2016/2017 the school was judged to be in the yellow support category which indicates it is an effective school with many aspects of performance which are self-improving.

The same arrangements will apply at the new school at Margam for pupils with special educational needs. Cymer Afan Comprehensive School currently teaches Welsh as a second language. This arrangement will continue under the proposal.





Neath Port Talbot

Castell-nedd Port Talbot

County Borough Council Cyngor Bwrdeistref Sirol

Education, Leisure & Lifelong Learning Service
Strategic School Improvement Programme

Consultation on the future of secondary education in the upper Afan Valley

If you have difficulty in reading this document it can be made available in a different format. Please contact ssip@npt.gov.uk with your request. It is also available on the Council's website using the following electronic link:

<https://www.npt.gov.uk/1891>

Contents

Page

1. Background	2
2. The proposal and why the change is being proposed	3
3. Impact of the proposal	4
4. Options that have been considered	12
5. Details of the schools affected	16
6. Quality of teaching and learning	24
7. Financial Overview	28
8. Consultation details	30
9. The legal matters	31
Appendices:	
List of Consultees	33
Comment Form	36

1. Background

The Council is committed to providing high quality education for all children and young people across the County Borough. It has implemented a Strategic School Improvement Programme that will help ensure that the right schools are in the right places and that they are capable of delivering an education fit for children and young people in the 21st Century. The Strategic School Improvement Programme informs the planning and decision making processes that will enable the Council to secure first class schools, delivering high standards of teaching and learning - for now and into the future. At the heart of the programme is the delivery of quality educational experiences that encourage and support pupil development - experiences that meet the aspirations of young learners, enhancing and enriching their lives and their life opportunities.

Implementing the Strategic School Improvement Programme involves reviewing existing educational provision, including specialist provision for pupils with additional learning needs. It also involves determining the number and type of schools needed to deliver education effectively and efficiently across the County Borough. As a result of this there will be changes which will involve opening new schools, closing existing schools, merging or amalgamating schools, federating schools and promoting new initiatives that support collaborative working between schools. In some instances, such changes will impact upon specialist provision located at mainstream schools for which alternative arrangements will need to be made. The changes will be necessary to improve standards of education, reduce surplus capacity, reduce large building repair bills and ensure the right schools in the right places for both English and Welsh-medium education, together with provision for those pupils with special educational needs/additional learning needs.

The Council has decided to review its educational provision on the basis of:

- a. educational standards
- b. the need for places and the accessibility of schools
- c. the quality and suitability of school accommodation
- d. effective financial management

On 9th November 2017 the Council's Education, Skills and Culture Cabinet Board gave permission to consult on the future of secondary education in the upper Afan Valley. The Council wishes to receive the views of parents, staff, pupils, the community and other key stakeholders.

2. The proposal and why the change is being proposed

The proposal

Consultation on the future of secondary education in the upper Afan Valley is being brought forward under a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive School, School Road, Cymmer, Port Talbot SA13 3EL to receive their secondary education at the new school at Margam, Bertha Road, Margam, Port Talbot, SA13 2AN and to discontinue Cymer Afan Comprehensive School.

If approved the proposal will take effect on the 1st September 2019 with Cymer Afan Comprehensive School closing on 31st August 2019

The new school at Margam is a 3-16, 'all-through', middle school, opening on 1st September 2018 in a new, purpose built facility at Margam, Port Talbot.

Why the change is being proposed?

The Council, as the local authority for the area, has a statutory responsibility for the planning of education provision. Where it intends making a significant change to provision (known as a regulated alteration) then a proposal to that effect needs to be published.

Cymer Afan Comprehensive School is a secondary school for boys and girls aged 11-16 years. Since September 2013 it has been part of a five school federation in the upper Afan Valley.

Cymer Afan Comprehensive School is a small school. In October 2017 it had 226 pupils on roll. It is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils, one of which is set to close in 2018.

The five school federation in the upper Afan Valley comprises four primary schools (Croeserw Primary, Cymer Afan Primary, Glyncorwg Primary and Pen Afan Primary) and one secondary school (Cymer Afan Comprehensive).

The federation was formally established in 2013 in order to address falling school roles and the consequent reduction in revenue funding. Pupil numbers attending the local schools had been falling, putting pressure on the schools to deliver teaching and learning in the context of reduced budget allocations. As such, the governors of the upper Afan Valley schools, working with the Council, moved to a federated arrangement as, at that time, it offered the best way forward for supporting the pupils and the schools.

Federation is the process whereby a group of schools decide to work in formal partnership under a single governing body. Schools within a federation maintain their own delegated budgets and identity but are able to explore the advantages of sharing resources such as facilities, IT, staff, school buildings and costs.

The federation has enabled schools to pool resources, appoint a single leadership to manage the five schools, deploy staff across the federation and put in place a bespoke curriculum arrangement to meet the needs of the children and young people of the area. In this respect it operates along the lines of a single 'all-through' school based on five separate sites and is delivering improvement in pupil's learning and attainment.

However, supporting the federation in the upper Afan Valley is at a high cost, sustained by budgets with high levels of small school protection. More importantly, the number of pupils attending the upper Afan Valley federation, particularly at secondary level, has not increased since its establishment and is not forecast to increase significantly going forward. This brings into question the sustainability of 11-16 age provision given that there are other secondary schools within reasonable travelling distance which could accommodate the pupils of the upper Afan Valley.

The new school at Margam is proposed as the receiving school because it is a new, 21st Century school build which is able to accommodate pupils from the upper Afan Valley. A new school provides greater prospects for improving educational attainment for pupils. An Estyn report (Jan 2007) on the performance of schools before and after moving into new buildings states that ageing school buildings which are in a poor state of repair cannot meet modern teaching and learning needs. It also states that inadequate buildings make improvements in standards more challenging and that in nearly all schools with new or refurbished buildings pupils attainment and achievement have improved and in some cases that improvement has been significant.

If the proposal is implemented then separate consideration on a way forward for the remaining schools in the federation will need to take place. Removal of Cymer Afan Comprehensive School from the federation will change the current federated structure and operational arrangements but should not diminish the benefits that can be realised from a formal collaborative working arrangement.

3. Impact of the proposal

The anticipated benefits of the proposal are that it will provide:

- a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils and staff
- access to a wider range of staff expertise
- opportunities for wider peer group interaction
- a more efficient and effective use of resources, and savings as a result of economies of scale
- greater protection against the impact of a schools funding formula review
- reduction in the number of surplus pupil places and an improved school building environment

Potential risk areas in implementing the proposal include:

- resistance to change leading to lack of pupil, parent and staff support
- educational standards not maintained
- loss of community facilities
- increased home to school travel time impacting on attendance and performance
- staff anxiety about job security/job losses
- negative impact on existing federation

Impact on pupils and parents

The pupils directly affected by this proposal will be current year 7, year 8 and year 9 at Cymer Afan Comprehensive School and year 5 & year 6 at the federated primary schools, along with future primary to secondary education pupil transfers in the upper Afan Valley.

Transfer to the new school at Margam will provide greater opportunities for pupils to access a wider range of specialist staff and facilities, increasing the opportunities for learning and socialising with a wider group of peers.

Teaching and learning opportunities are increased in new build state of the art facilities. An evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and other stakeholders.

For pupils from the upper Afan Valley, transfer to the new school at Margam will involve a daily travel journey of approx. 13 miles from the furthest communities for which transport will be provided to eligible pupils¹. A test run of the journey by coach, including pick-up/drop-off stops and at times corresponding to the start and end of the school day, shows the travel time to

¹ Eligibility for assistance with transport will be determined in line with the Council Home to School Travel Policy

be approximately 40 - 45 mins. in one direction. A significant number of pupils currently attending Cymer Afan Comprehensive travel to school by bus on a daily basis, although the travel time and distance will be much less than the journey to Margam. Pupils will see an increase in journey time of approx. 30 - 35 mins. in one direction.

If the proposal is implemented then the catchment area to be served by the new school at Margam will be revised to include the area currently served by Cymer Afan Comprehensive School. The arrangements for admission to the new school at Margam will be in line with the Council's approved admission arrangements for community schools which prioritises² places for pupils living in the catchment area over those living elsewhere.

Whereas this consultation proposal is based on making provision for pupils from the upper Afan Valley to receive their education at the new school at Margam, parents are entitled to express a preference for admission at an alternative school, which will be granted subject to the availability of places. For community schools in Neath Port Talbot, the Council's admission policy will apply. For Faith schools and schools in other local authorities, separate arrangements apply and contact will need to be made with the respective authority³.

In respect of face to face school/parent contact, the distance between the new school and the upper Afan Valley will require different management arrangements than those that currently exist. This is not a situation that is unfamiliar to schools. Similarly, arrangements will need to be made to ensure pupils are able to access the full range of facilities and opportunities available at the new school. Again, this is not a situation with which schools are unfamiliar and alternative arrangements can be made. Already, pupils from Cymer Afan Comprehensive School have participated in sporting activities with Ysgol Bae Baglan.

As part of the consultation process, pupil views will be sought and listened to. The views of pupils in previous school organisation proposal have resulted in specific actions in response to concerns raised. An example would be a concern over integration where pupils from different schools come together. In that instance a response was to bring pupils from the schools together in sports teams prior to a move to the new school.

² Highest priority is given to Looked After Children and children with statements of Special Educational Needs.

³ Contact Neath Port Talbot Council for advice.

The effect of the proposal on the schools that pupils attend

Table 1 below shows how proposed changes will impact pupils currently attending schools in the upper Afan Valley federation (Sept. '17 – Sept '20).

Table 1:

Pupils on roll at the Federated Schools of the Upper Afan Valley	School Year Beginning			
	Sept 2017	Sept 2018	Sept 2019	Sept 2020
Current Year 11	Y11 at Cymer Afan Comp.	Left school Aug 2018		
Current Year 10	Y10 at Cymer Afan Comp.	Y11 at Cymer Afan Comp.	Left school Aug 2019	
Current Year 9	Y9 at Cymer Afan Comp.	Y10 at Cymer Afan Comp.	<i>Y11 at the new school at Margam</i>	Left school Aug 2020
Current Year 8	Y8 at Cymer Afan Comp.	Y9 at Cymer Afan Comp.	<i>Y10 at the new school at Margam</i>	<i>Y11 at the new school at Margam</i>
Current Year 7	Y7 at Cymer Afan Comp.	Y8 at Cymer Afan Comp.	<i>Y9 at the new school at Margam</i>	<i>Y10 at the new school at Margam</i>
Current Year 6	Y6 at present primary school	Y7 at Cymer Afan Comp.	<i>Y8 at the new school at Margam</i>	<i>Y9 at the new school at Margam</i>
Current Year 5	Y5 at present primary school	Y6 at present primary school	<i>Y7 at the new school at Margam</i>	<i>Y8 at the new school at Margam</i>
Current Year 4	Y4 at present primary school	Y5 at present primary school	Y6 at present primary school	<i>Y7 at the new school at Margam</i>
Current Year 3	Y3 at present primary school	Y4 at present primary school	Y5 at present primary school	Y6 at present primary school
Current Year 2	Y2 at present primary school	Y3 at present primary school	Y4 at present primary school	Y5 at present primary school
Current Year 1	Y1 at present primary school	Y2 at present primary school	Y3 at present primary school	Y4 at present primary school
Current Rec. Year	Rec at present primary school	Y1 at present primary school	Y2 at present primary school	Y3 at present primary school

Table 2 below shows the corresponding arrangements for pupils currently attending Dyffryn School and Groes Primary who, from Sept. 2018 will transfer to the new school at Margam.

Table 2

Pupils on roll at Dyffryn School and Groes Primary	School Year Beginning			
	Sept 2017	Sept 2018	Sept 2019	Sept 2020
Current Year 11	Y11 at Dyffryn School	Left school Aug 2018		
Current Year 10	Y10 at Dyffryn School	<i>Y11 at the new school at Margam</i>	Left school Aug 2019	
Current Year 9	Y9 at Dyffryn School	<i>Y10 at the new school at Margam</i>	<i>Y11 at the new school at Margam</i>	Left school Aug 2020
Current Year 8	Y8 at Dyffryn School	<i>Y9 at the new school at Margam</i>	<i>Y10 at the new school at Margam</i>	<i>Y11 at the new school at Margam</i>
Current Year 7	Y7 at Dyffryn School	<i>Y8 at the new school at Margam</i>	<i>Y9 at the new school at Margam</i>	<i>Y10 at the new school at Margam</i>
Current Year 6	Y6 at Groes Primary school	<i>Y7 at the new school at Margam</i>	<i>Y8 at the new school at Margam</i>	<i>Y9 at the new school at Margam</i>
Current Year 5	Y5 at Groes Primary school	<i>Y6 at the new school at Margam</i>	<i>Y7 at the new school at Margam</i>	<i>Y8 at the new school at Margam</i>
Current Year 4	Y4 at Groes Primary school	<i>Y5 at the new school at Margam</i>	<i>Y6 at the new school at Margam</i>	<i>Y7 at the new school at Margam</i>
Current Year 3	Y3 at Groes Primary school	<i>Y4 at the new school at Margam</i>	<i>Y5 at the new school at Margam</i>	<i>Y6 at the new school at Margam</i>
Current Year 2	Y2 at Groes Primary school	<i>Y3 at the new school at Margam</i>	<i>Y4 at the new school at Margam</i>	<i>Y5 at the new school at Margam</i>
Current Year 1	Y1 at Groes Primary school	<i>Y2 at the new school at Margam</i>	<i>Y3 at the new school at Margam</i>	<i>Y4 at the new school at Margam</i>
Current Rec. Year	Rec at Groes Primary school	<i>Y1 at the new school at Margam</i>	<i>Y2 at the new school at Margam</i>	<i>Y3 at the new school at Margam</i>

Impact on travel arrangements

Support with home to school travel is made available in line with the Council's Home to School Travel policy which provides assistance with transport for secondary age pupils living 3 miles or more from their nearest suitable school which includes a school in another Authority. This proposal designates the new school at Margam as the receiving school, therefore the Council will consider this school to qualify as a 'nearest suitable' school and, as the

distance between the upper Afan Valley and Margam is more than 3 miles, assistance with travel will be provided to eligible pupils.

Currently, around 130 pupils attending Cymer Afan Comprehensive School receive assistance with home to school transport. Transfer to the new school at Margam will involve a daily travel journey of approximately 13 miles from the furthest communities. A test run of the journey by coach, including pick-up/drop-off stops and at times corresponding to the start and end of the school day, shows the travel time to be approx. 40 - 45 mins. in one direction.

The current annual cost of transporting pupils to Cymer Afan Comprehensive School is c.£64k. Based on current assumptions the annual cost of home to school transport between the upper Afan Valley and the new school at Margam is estimated to be in the region of c.£140k. As such, this proposal will result in an annual increase in travel costs of c.£76k.

There are regular (hourly) public transport bus services travelling between the upper Afan Valley and Port Talbot, details of which can be found using the electronic link: <https://www.firstgroup.com/south-west-wales/routes-and-maps/route-maps>

There is nothing to suggest significant disruption of the bus services because of highway conditions.

An analysis of school closure information due to inclement weather reveals that over the past four winters Cymer Afan Comprehensive School has been closed for snow on only three occasions and these were in January 2013. These 3 days of disruption need to be seen in the context of the 190 days when a school is open in each school year.

Should the proposal be implemented then routes will be assessed to ensure the new school at Margam is accessible to pupils. Site configuration at the new school provides sufficient parking for school buses.

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

The Council's Home to School Travel Policy can be viewed on the Council's website using the following electronic link:
https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf

Impact on school based staff

– Federated school staff

There are 65 school based staff recorded as employed by the Federation of Schools in the Upper Afan Valley with contracts attached to Cymer Afan Comprehensive School. Of these 29 have homes addresses in the upper Afan Valley. The home addresses of the remaining 36 suggest that they live elsewhere. 26 are teaching staff or senior leaders. The remaining 39 are school support staff.

Should a decision be taken to close the school, staff with contracts attached to Cymer Afan Comprehensive School will be declared redundant. Employees identified at risk of redundancy will be supported by the Council's policies and HR staff.

Employment for some may continue within the federation whilst there is also the potential for employment opportunities at the receiving school because of increased numbers.

The governing bodies of schools in Neath Port Talbot have pledged to employ redundant staff where possible.

– Staff support

As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that as a result of school reorganisation some staff take the opportunity to undertake new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a proven track record for supporting staff in such situations.

Impact on governors

The five schools in the upper Afan Valley are managed by a federated governing body. The federation could continue following the closure of Cymer Afan Comprehensive School, albeit with a revised structure and purpose. Benefits associated with federation can still be realised within a federation of primary schools alone.

Cymer Afan Comprehensive School will continue to exist and be managed by the federated governing body until its closure.

Impact on special needs education needs provision

There is no specialist unit for pupils with statements of special educational needs at Cymer Afan Comprehensive School. Pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose. The same arrangements will apply at the new school at Margam.

Impact on Welsh language education

At Cymer Afan Comprehensive school the Welsh dimension is strongly supported. There are many valuable opportunities provided to develop pupils' knowledge and understanding of the history, culture and industry of Wales. All pupils follow an appropriate course in Welsh in key stage 4, and a majority of pupils gain a qualification in Welsh at GCSE.

Whereas the new school at Margam has yet to open, the experience at Dyffryn School serves as a helpful benchmark as the new school would wish to build on the strengths of existing provision. At Dyffryn School almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This was reported by Estyn to be strength of the school, who also noted that the school has been effective in promoting positive attitudes to the learning of Welsh.

The school is working towards improving pupils' Welsh language skills beyond formal Welsh lessons, and to encourage greater pupil self-confidence when using the language.

There is no reason to suggest that Welsh language provision at the new school will not be at least comparable with the provision currently offered at Cymer Afan Comprehensive School and that implementing the proposal should result in a positive impact on Welsh language development.

The full Welsh language assessment is available on the council website using the electronic link⁴: <https://www.npt.gov.uk/1891>

Impact on the community

The Community Impact Assessment (CIA) has been carried out in line with the requirements of the School Organisation Code. This is an assessment of the impact on the community of those facilities and services currently available at Cymer Afan Comprehensive School. The assessment recognises the importance of Cymer Afan Comprehensive School and the part it plays in the wider community. Community provision and activities that have been developed over an extended period at the school site will be displaced under this proposal, however opportunities exist to relocate activity from the school to alternative locations. The assessment reports that these locations can be enhanced as appropriate with no loss of amenity to the wider community and recommends that plans are put in place to mitigate any loss.

Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

The full Community Impact Assessment can be viewed on the Council's website using the following electronic link⁵: <https://www.npt.gov.uk/1891>

Equality Impact Assessment

An equality impact assessment has been carried out and found that the consultation on the future of secondary education in the upper Afan Valley should have no adverse effect on any particular group. The process has checks and monitoring in place to ensure any unmet need is identified and any potential adverse effect is fully evaluated and impact mitigated.

The assessment can be viewed⁶ on the Council's website: <https://www.npt.gov.uk/1891>.

4. Options that have been considered

The Council has the responsibility for ensuring that it is making the very best use of resources and facilities in order to deliver high quality educational experiences and opportunities for children and young people.

⁴ Hard copy is available on request.

⁵ Hard copy is available on request.

⁶ Hard copy is available on request.

Option 1 – Status quo: maintain the existing five school federation in the upper Afan Valley.

The schools in the five school federation would continue to support each other and there would be no immediate disruption to current arrangements for teaching and learning, staff employment or the provision of community facilities.

However the high cost of maintaining a small secondary school is not efficient use of Council resources.

The benefits of a new, 21st century school environment will not be realised by maintaining the status quo, and so opportunities for improved teaching and learning experiences would be lost.

Implementing the proposal to close Cymer Afan Comprehensive School would effectively remove backlog maintenance and accessibility costs of c.£3m. Maintaining the secondary school at the existing site would require significant investment which is not considered to be the best use of resources.

Cymer Afan Comprehensive School is operating with 65% surplus places, this is not sustainable in the long term.

Option 2 – Federate with another secondary school

In a federation, schools are managed by a single governing body which takes decisions about matters such as staffing structures and expenditure. Under single leadership and governance there are potential teaching and learning benefits, staff development opportunities and efficiencies that can arise from a federated arrangement. A single governing body will be able to pool resources, maximise staff expertise and share facilities. A federation also presents the opportunity to co-ordinate curriculum provision and employ whole school teaching/learning strategies that will improve school performance and enhance educational experiences.

Although a federated arrangement with another secondary school would provide additional teaching and learning support and opportunities for wider peer group interaction as well as retain secondary education in the upper Afan Valley and avoid an increase in annual home to school travel costs, it does not address the high costs of maintaining a small secondary school. Neither will it deal with the significant surplus places at Cymer Afan Comprehensive school

and ongoing cost of building maintenance and repair. Importantly, it does not enable the pupils of the upper Afan Valley to benefit from education in a new, purpose built, 21st Century school environment. In addition, the high cost of education delivery at a small school would remain.

Option 3 – Build a new ‘all-through’ middle school to replace the existing secondary and four primary schools.

The benefits of a 21st century school teaching and learning environment would be realised and significant backlog maintenance and repair liabilities would be removed together with significant surplus places and additional redundancy costs. However, delivering secondary phase education with the necessary specialist teaching facilities and the high cost of sustaining the curriculum would still be a challenge given the small number of secondary age pupils. On cost alone, this would make the benefits of the investment difficult to justify. For a secondary school of less than 300 pupils it is unlikely that a business case could be developed to secure grant funding for a new 21st century school build or a replacement facility

Option 4 – Make arrangements for the pupils to receive their secondary education at the new school at Margam and close Cymer Afan Comprehensive School.

A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range. With a new school come more choices and improved opportunities because of better facilities.

An evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Cymer Afan Comprehensive School has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, i.e. poor, elements are exhibiting major defects and/or not operating as intended. This option would remove these financial liabilities. There are school budget share revenue savings to be made from educating the pupils of the upper Afan Valley at the new school at Margam, savings that will be reinvested into the education budget.

Delivering the range and breadth of the curriculum can be more challenging in a small school, placing increased burdens on a small number of staff. A larger school is better placed to offer a wider range of options due to economies of scale and, in general, curriculum provision is broader and more balanced.

The new school at Margam is within reasonable travel distance for pupils living in the upper Afan Valley.

Option 5 – Make arrangements for the pupils to receive their secondary education at a secondary school other than the new school at Margam and close Cymer Afan Comprehensive School.

There are two other secondary schools that are near to the upper Afan Valley. They are Cefn Saeson Comprehensive School, Cimla, Neath and Maesteg School, Maesteg.

Cefn Saeson Comprehensive School has surplus capacity. However, at present it cannot offer the 21st century new build facilities of the kind that will be available at the new school at Margam. Cefn Saeson Comprehensive School is some 9 miles for the furthest communities of the upper Afan Valley.

Maesteg School is under the control of Bridgend County Borough Council. As such, its admission arrangements are outside the control of Neath Port Talbot. Admission for pupils from the upper Afan Valley could not be guaranteed at this juncture. A formal agreement with the neighbouring Authority would need to be put in place. Bridgend County Borough Council is a consultee. Information received from Bridgend County Borough Council indicates that pupils from the upper Afan Valley currently attend Maesteg School which is the nearest alternative suitable secondary school to the upper Afan Valley, some 7 miles for the furthest community.

Option 6 – to establish the upper Afan Federation of schools as the centre for public services in the upper Afan Valley

This option has been submitted to the Local Authority for consideration. Under this option it is proposed that the upper Afan Valley federation of schools could be further developed to meet the needs of health, education and the economy in the upper Afan Valley. It is envisaged that this would involve longer opening hours of the school buildings, greater community use of the school facilities and the federation becoming the focus for all public services in the area.

Currently there are many, varied community facilities available within easy reach of the secondary school and whereas the rationalisation of facilities and resources, together with the benefits of closer working arrangements with statutory and voluntary services, are worthy of consideration further expansion of activities does not appear to be necessary at the school site. Many of the current community facilities are well used in their current locations suggesting that they are already meeting the needs of the local community groups who use them, and implying that movement to a central school setting would not necessarily be beneficial.

Establishing the upper Afan Valley federation of schools as a focus of public services would depend upon those statutory and voluntary services identifying this as a desirable option and on those bodies developing plans to create or relocate services. This has not been the case to date, however a federation of primary schools could still deliver many of the perceived benefits of this option.

Further information regarding the evidence base and financial implications of this option is awaited.

Preferred Option for consultation - Option 4

Having considered information gathered to date, the option to make arrangements for the pupils to receive their secondary education at the new school at Margam and close Cymer Afan Comprehensive School is recommended as the basis for consultation, being affordable and educationally transformational.

5. Details of the schools affected

Cymer Afan Comprehensive School and the upper Afan Valley Federation

Cymer Afan Comprehensive School is an English-medium community school for boys and girls aged 11-16 years. Since September 2013 it has been part of a five school federation in the upper Afan Valley.

Cymer Afan Comprehensive School is a small school. In October 2017 it had 226 pupils on roll. It is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils.

The five school federation in the upper Afan Valley, formally established in 2013, comprises four primary schools (Croeserw Primary, Cymer Afan Primary, Glyncorwg Primary and Pen Afan Primary) and one secondary school (Cymer Afan Comprehensive).

Cymer Afan Comprehensive School also hosts a number of on-site community facilities which, notionally would be displaced by the closure of the school. However, the community impact assessment which informs this document sets out a number of mitigation proposals to ensure no loss of amenity to the wider community.

There has been a 36% (127) fall in pupil numbers over the past ten years with a 2016 low of 210. Pupil numbers for this period are shown in table 3 below.

Table 3

<i>Cymer Afan Comp.</i>												
	Annual census - January											Oct
Year	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2017
Pupil Nos.	353	343	351	326	302	288	266	244	216	210	213	226

Forecasts based on January annual census returns suggest a potential increase of 54 pupils by 2021 (table 4). However, Cymer Afan Comprehensive will still be a small secondary school with numbers returning only to 2013 equivalent levels. Pupil numbers are projected to fall slightly in 2022/23.

Table 4

<i>Cymer Afan Comp.</i>							
	<i>Annual census - January</i>	<i>January forecasts</i>					
Year	2017	2018	2019	2020	2021	2022	2023
Pupil numbers	213	221	220	241	267	259	260

Surplus capacity impact

The proposal directly addresses unfilled places at Cymer Afan Comprehensive school. With the physical capacity to accommodate 641 pupils (table 5) the school has a significant surplus capacity of 65% (415 places). Even at the forecasted high in 2021 there will still be 58% surplus capacity at the school, leaving the school notionally over half empty. This level of surplus capacity has revenue and capital costs associated with maintaining the school.

Table 5

<i>Cymer Afan Comp.</i>				
		<i>Jan 2017</i>		<i>Jan 2023</i>
	School capacity	October 2017 Pupil Nos.	Surplus places	Projected Pupil Numbers
<i>Pupil numbers</i>	641	226	415	260

The new school at Margam

Consultation on the future of secondary education in the upper Afan Valley is being brought forward under a proposal to provide secondary education at the new school at Margam for the pupils who would otherwise attend Cymer Afan Comprehensive School. This is a new, 21st century build, 3-16, ‘all-through’ middle school with capacity to provide for 1200 secondary age pupils. (It will also provide for 210 full-time primary age pupils, 45 nursery age pupils specifically from the catchment area currently served by Groes Primary school.) The new school at Margam is an English-medium community school which has room to accommodate pupils from the upper Afan Valley (table 6 below).

A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range.

With a new school come more choices and improved opportunities because of better facilities. Estyn report that the attainment and achievement of pupils improves significantly when they move into new or significantly refurbished buildings, particularly when schools are in areas with high levels of social and economic deprivation.

The new school at Margam will provide adaptable ICT facilities suitable for learning in the 21st century. Mobile technology will be integrated with a sound teaching and learning base to provide pupils with enhanced learning experiences, equipping them with the key skills and motivation needed to raise standards.

The new build school will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction. The 2015 report, ‘Clever Classrooms’, found that well designed schools can significantly boost children’s academic performance in reading, writing and maths. The school will allow for the delivery of a pupil centred, inclusive and

skills based curriculum that extends to social and sporting activities. It will aim to promote equality and inclusion by providing facilities, sporting and cultural.

Following the first year of operation, an evaluation of the transfer to a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Table 6

<i>The new school at Margam (secondary school capacity = 1200).</i>							
	<i>Annual census January</i>	<i>January forecasts</i>					
Year	2017	2018	2019	2020	2021	2022	2023
Est. pupil numbers	790 (Dyffryn School)	787	826	848	843	847	855
Cymer Afan Comp.	n/a	n/a	220	241	267	259	260
Total:	n/a	787	1046	1089	1110	1106	1115

For comparison purposes, the pupil roll at Dyffryn School for the previous four years is set out below in table 7

Table 7

<i>Annual School Census Return – Dyffryn School.</i>				
	Jan 2014	Jan 2015	Jan 2016	Jan 2017
11-16	773	758	790	790

Quality of accommodation

The building condition of Cymer Afan Comprehensive School was last assessed in 2015. The site is categorised as overall building condition C, i.e. poor, elements are exhibiting major defects and/or not operating as intended. Many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years. The school has received some investment over recent years, including replacement of the main boiler and controls.

The building accessibility appraisal completed in 2015 reports that the school is access grade D which indicates that buildings are inaccessible, are non-compliant with accessibility legislation and cannot be made so at reasonable expense.

The costs of backlog maintenance and accessibility amount to c.£3m, as can be seen on the survey report's cover page below. This figure is an estimation of costs as at the date the condition assessment was undertaken in 2015. The effect of inflation and possible further deterioration over the intervening period will mean that current costs will be as high if not higher. The detailed building condition and accessibility assessment can be accessed on the Council's website using the following electronic link⁷: <https://www.npt.gov.uk/1891>

Plans for a vacated Cymer Afan Comprehensive School site have not yet been developed. The school site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process. If the site or part of the site is sold the monies raised will be reinvested into the general education budget.

Survey report - cover page

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT				
CONDITION ASSESSMENT REPORT				
		Report run on: December 22, 2015 3:11 PM		
UPRN:	286001195975	CYMER AFAN COMPREHENSIVE SCHOOL SCHOOL ROAD CYMMER PORT TALBOT		
Assessment Date:	24 NOV 2015	Assessment Id 701		
Surveys By:	PROPERTY & REGENERATION	Public Access:	YES	Fire Precautions C
Asbestos:	ASBESTOS WIDELY PRESENT - WELL MANAGED / LOW RISK; MINOR DAMAGE TO CEILING BOARDS AND VINYL FLOOR TILES. PRESENCE OF ASBESTOS WILL AFFECT REFURBISHMENT WORKS.			
		Condition Grade	Condition Cost	Access Grade
				Access Cost
Unit 0	EXTERNAL AREAS		109,500.00	59,000.00
Unit 1	CYMER AFAN COMPREHENSIVE SCHOOL SCHOOL BLOCK 1	C	1,375,000.00	D 146,750.00
Unit 2	CYMER AFAN COMPREHENSIVE SCHOOL SCHOOL BLOCK 2	C	1,046,750.00	C 100,250.00
Unit 3	CYMER AFAN COMPREHENSIVE SCHOOL SPORTS HALL AND SWIMMING POOL BLOCK 3	B	88,000.00	C 42,000.00
	OVERALL SITE	C	2,619,250.00	D 348,000.00
Site Comments:	OVERALL, THE SITE HAS RECEIVED MINIMAL TO MODERATE INVESTMENT OVER RECENT YEARS. THE MAIN BOILER AND CONTROLS WERE RECENTLY RENEWED. REMAINING BUILDING AND MECHANICAL ELEMENTS ARE NEARING THE END OF THEIR LIFESPAN AND REPLACEMENTS / REFURBISHMENTS REQUIRED.			

The new school at Margam is a c.£30m investment in a new build 21st century school which will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms with access to a range of high quality and appropriate spaces for social interaction. New build facilities offer improved teaching and learning opportunities and can have significant impact on the attainment and achievement of pupils.

⁷ Hard copy is available on request.

The new school is a purpose built facility. It will be equipped with general classrooms, specialist teaching areas, hall, sports hall, ancillary rooms and administrative areas compatible with the requirements of building bulletins 98 & 99. Similarly, outdoor play area and pitches will be appropriate to the needs of a 3-16, 'all-through' school. These facilities, indoor and outdoor, will be available for community use under the management of the school.

Other schools that are, or could potentially be, affected by this proposal

Croeserw Primary, Cymer Afan Primary, Glyncorrwg Primary and Pen Afan Primary schools are partner schools with Cymer Afan Comprehensive in the upper Afan Valley federation. All four are English-medium community schools maintained by Neath Port Talbot County Borough Council. They provide for boys and girls aged 3-11 and are situated in upper Afan Valley villages of Croeserw, Cymmer, Glyncorrwg and Blaengwynfi respectively. Croeserw Primary hosts a learning support centre for pupils with special educational needs.

The combined capacity of the four schools is 540 with 357 full-time pupils on roll.

These schools are affected by this proposal in three key areas. Firstly, if the proposal is implemented then at secondary school transfer the pupils will attend a school other than Cymer Afan Comprehensive. Secondly, if the proposal takes effect on the 1st September 2019 as proposed then current Year 5 and Year 6 pupils at the four primary schools will be directly affected as the first cohort of pupils to transfer under the new arrangement. Thirdly, removal of Cymer Afan Comprehensive School from the federation will change the current federated structure.

Table 8

<i>Primary schools (inc Nursery & LSC)</i>							
	<i>Annual census - January</i>	<i>January forecasts</i>					
<i>Year</i>	<i>2017</i>	<i>2018</i>	<i>2019</i>	<i>2020</i>	<i>2021</i>	<i>2022</i>	<i>2023</i>
Croeserw	158	162	164	155	148	149	144
Cymer Afan	74	70	69	77	74	79	87
Glyncorrwg	91	87	87	84	84	77	71
Pen Afan	126	130	134	141	141	147	154
Total:	449	449	454	457	447	452	456

Table 9

<i>Primary schools (inc Nursery & LSC)</i>												
	<i>Annual census - January</i>											Oct
Year	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2017
Croeserw	170	153	150	126	138	155	153	149	162	170	158	158
Cymer Afan	69	66	63	66	63	69	75	70	61	63	74	72
Glyncorrgw	100	92	88	94	91	83	96	88	95	96	91	89
Pen Afan Abergwynfi Inf/Jun until 2010	132	125	109	100	99	98	92	104	111	115	126	122
Total:	471	436	410	386	391	405	416	411	429	444	449	441

Cefn Saeson Comprehensive School is an English-medium community school maintained by Neath Port Talbot County Borough Council. It provides for boys and girls aged 11-16 and is situated in Cimla, a residential area about one mile from Neath town centre. It has capacity to accommodate 924 pupils and has 653 pupils on roll (Jan 2017). Cefn Saeson Comprehensive School is some 9 miles from the furthest communities of the upper Afan Valley.

The latest Estyn inspection reported that Cefn Saeson Comprehensive is a school with an inclusive and supportive ethos where pupils feel safe and who think that the school deals well with matters important to their welfare. Estyn also reported that the school provides a caring and supportive environment that has a positive impact on pupils' personal development. Provision for pupils with additional learning needs is effective and enables them to progress well with their learning. The school is currently placed in the Green category of support.

Table 10

<i>Annual School Census Return – Cefn Saeson Comp.</i>				
	Jan 2014	Jan 2015	Jan 2016	Jan 2017
11-16	685	631	619	653

Table 11

<i>Five Year Forecasts – Cefn Saeson Comp.</i>					
	Jan 2018	Jan 2019	Jan 2020	Jan 2021	Jan 2022
11-16	722	720	754	771	785

In respect of building condition, Cefn Saeson Comprehensive school is assessed as condition grade category D, and category C for access. The main

building was constructed in 1972 and many of the original components have exceeded their life expectancy.

Cefn Saeson Comprehensive School is affected by this proposal as it is a potential receiving school for pupils from the upper Afan Valley whose parents choose to send their children to a nearby alternative school.

Maesteg School is an English-medium community school maintained by Bridgend County Borough Council. It provides for boys and girls aged 11-18, and is situated in the town of Maesteg. It moved locations from two separate sites to a new build on one site in 2008. Currently, the school has 1046 pupils on roll and capacity for 1333, incl. sixth form pupils. Maesteg School is approx. 7 miles from the furthest communities of the upper Afan Valley.

Estyn inspected the school in 2012 and found that performance and prospects for improvement were both good, reporting that pupils benefit from an excellent level of support which impacts positively on wellbeing and standards. Pupils with additional learning needs are reported to achieve well, often above expectations, and the school environment is noted to contribute to a positive learning atmosphere. The school is currently placed in the Amber category of support which indicates it is a school in need of improvement and has aspects of performance which are not improving quickly enough.

In respect of building condition, Maesteg School is assessed as condition grade category A, i.e. Good/performing as intended and operating efficiently. For suitability it is assessed as grade category A, i.e. Good/facilities suitable for teaching, learning and wellbeing in schools.

Table 12

<i>Annual School Census Return – Maesteg School</i>				
	Jan 2014	Jan 2015	Jan 2016	Jan 2017
11-16	922	903	909	927
6 th Form	202	193	204	177

Table 13

<i>Five Year Forecasts – Maesteg School</i>					
	2018	2019	2020	Jan 2021	Jan 2022
11-16	902	892	899	884	896
6 th Form	167	171	168	186	184

Maesteg School is affected by this proposal as it is a potential receiving school for pupils from the upper Afan Valley whose parents choose to send their children to a nearby alternative school.

6. Quality of teaching and learning

Outcomes

Cymer Afan has 38% of pupils entitled to free school meals and 45% with identified additional learning needs. This places the school in benchmarking group 5. The school was inspected in April 2015 and both the current performance and the prospects for improvement were judged to be adequate. Estyn monitored the school and in November 2016 the school was judged to have made good progress in respect of the key issues for action.

Estyn (2015) report that standards are 'adequate' and note that 'When compared with their attainment in previous key stages, pupils make sound progress'.

In 2016/2017 the school was judged to be in the yellow support category of the National Categorisation system, which indicates it is an effective school with many aspects of performance which are self-improving.

Estyn report that wellbeing is 'good' at Cymer Afan Comprehensive School and that pupils are generally polite and well behaved. Estyn also report that 'many pupils enjoy their lessons and most have positive attitudes to learning'.

In 2015/2016 attendance improved to 92.3% from 91.5%, resulting in the school performing in the top 50% when compared to similar schools.

In the first year of operation the secondary pupil cohort at the new school at Margam will comprise pupils who would otherwise have attended Dyffryn School. In this regard, whereas the new school at Margam has yet to open, the current performance at Dyffryn School serves as a helpful comparator, as the new school would wish to build on the strengths of existing provision.

Dyffryn School has 20% of pupils entitled to free school meals and 24% with identified additional learning needs. The school is placed in benchmarking group 3. The school was inspected in April 2014 and both the current performance and the prospects for improvement were judged to be good. The school's performance at key stage 4 in the indicators that include English and Mathematics place the school consistently in the top 50% of similar schools, with a drop to quartile 3 in 2015.

Dyffryn School is currently in the yellow support category (2016/2017). Estyn report that pupil wellbeing is good and that pupils treat each other with respect, listen to each other’s views and co-operate very well when working together. They enjoy coming to school and behave very well in lessons and around the school. Attendance data indicates the school is consistently above similar schools and is currently almost 94% (2016/2017 data).

In their report ‘School Size and Education Effectiveness’ (December 2013) Estyn state that ‘large primary and secondary schools tend to perform better than small and medium size schools’. 71% of secondary schools with less than 600 pupils require follow up activity after an Estyn inspection, compared to 46% of schools with more than 1,100 pupils. 21% of the smaller schools will be placed in a statutory category (significant improvement or special measures) while just 4% of larger schools will require the same level of support. In the same report, Estyn also state that the performance of pupils in key stage 3 and key stage 4 is generally better in large secondary schools, and note that large secondary schools can provide more appropriate levels of challenge and support.

End of Key Stage 3 Data

Performance indicators for Key Stage 3 place Cymer Afan Comprehensive School consistently in 3rd or 4th quartile for core subjects at level 5+ and at level 6+. In 2016, 57% of pupils attained the expected level 5 or above in the core subjects of English, Maths and Science compared to 71% of pupils in similar schools, 78% in Neath Port Talbot and 86% across Wales.

In 2015 and 2016 Dyffryn School Key Stage 3 data also places the school in quartile 3 and 4 for core subjects at level 5+ and at level 6+. Pupils are performing above the local authority average and just below similar schools and schools across Wales in all core subjects.

Key Stage 4 Data

Results at Key Stage 4 at Cymer Afan Comprehensive School have shown a steady improvement over three years in all key indicators with a significant rise in 2016.

Table 14

Cymer Afan	2014	2015	2016
Level 2 Inc. E/W & M	31	33	59
Level 2	85	93	96
Level 1	97	98	100
CSI	31	33	49

Results for level 2 (5A*-C grades) show the school is performing better than similar schools, schools in Neath Port Talbot and schools across Wales as a whole, and since 2014 the school has been placed consistently in quartile 1. In 2016, 59% of pupil attained 5 A* -C GCSEs including English and Maths, a 26% increase from 2015.

Table 15

	Cymer Afan	Family	LA	Wales
Level 2 Inc. E/W & M	59	42	61	60
Level 2	96	78	89	84
Level 1	100	91	95	95
CSI	49	36	57	58

At Dyffryn School results for level 2 also indicate that the school is consistently in quartile 1 when compared to similar schools and also performs well against schools in Neath Port Talbot and across Wales.

Table 16

Dyffryn	2014	2015	2016
Level 2 Inc. E/M	51	48	75
Level 2	98	94	96
Level 1	99	97	100
CSI	51	47	73

75% of pupils attained 5 GCSEs at A*-C grades including English and Maths in 2016, an increase of 27%. The school is performing well in every key indicator when compared to the family of similar schools, other schools across Neath Port Talbot and schools across Wales.

Table 17

	Dyffryn	Family	LA	Wales
Level 2 Inc. E/W & M	75	62	61	60
Level 2	96	86	89	84
Level 1	100	98	95	95
CSI	73	59	57	58

Provision

Estyn report that Cymer Afan Comprehensive has a warm, happy and friendly ethos that respects the United Nations Convention on the Rights of the Child, and learning experiences are judged to be good. The school supports pupils well and works with a wide range of agencies to promote health and wellbeing.

This has a positive impact on improving pupils' behaviour, engagement and attitudes to learning.

At Dyffryn School, Estyn report that learning experiences are good with an extensive range of extra-curricular activities, which include sport and music. Teaching is also judged to be good and pupils demonstrate motivation and engagement in learning. Pupils benefit from strong care, support and guidance, and safeguarding arrangements are good.

Estyn report in their publication 'School Size and Education Effectiveness' (December 2013) that 'curriculum provision tends to be broader and more balanced in large secondary schools'. Cymer Afan Comprehensive is a small secondary school with 226 pupils on roll. Delivering the range and breadth of the curriculum can be more challenging in a small school, placing increased burdens on a small number of staff.

Dyffryn School has been subject to school reorganisation and will become part of the new 3-16 school in Margam from September 2018. The school will occupy new build premises providing the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that will aim to improve the learning outcomes for all children across the ability range. With a new school comes more choices and improved opportunities because there is more space and better facilities.

Cymer Afan Comprehensive School is dependent on the support of 14-19 partnerships and works well with other providers to ensure that pupils have the opportunity to study a broad mixture of academic and vocational courses. In larger schools there is more autonomy and less dependency on partnership working and a wider range of options can be made available due to economies of scale.

Dyffryn School was judged by Estyn to have excellent partnership working, and 'has established highly effective partnerships that have had a significant impact on sustaining high standards of pupil attainment and wellbeing'.

Estyn report that in larger schools teaching is good or better in 63% of lessons, while just under 50% of teaching is good or better in smaller schools. Sharing good practice across departments is easier in a larger school with more staff, and gives teachers opportunities to better develop curriculum planning and delivery through closer working with colleagues.

Leadership and Management

Estyn report in 2015 that leadership and management at Cymer Afan Comprehensive School was adequate. They noted that: ‘The warm, and caring ethos developed by leaders has resulted in improvements in pupils’ behaviour, engagement and attitudes to learning’. However, they also report that leadership has not had enough impact in ensuring good progress in indicators that include English and Maths.

The school has experienced some instability in recent years with a number of changes in key leadership roles. Recruitment of a permanent Headteacher has proven to be difficult and, currently, the school has an acting Headteacher seconded from another secondary school in Neath Port Talbot. The post has recently been advertised nationally on a number of occasions but the school has not been successful in appointing a permanent head teacher.

Leadership and management at Dyffryn School are judged to be good and the school has been successful in sustaining high outcomes for pupils.

Reports of Estyn, the schools’ inspectorate, are available on:
<http://www.estyn.gov.uk/english/inspection/inspection-reports>

7. Financial Overview

Revenue costs associated with maintaining a small secondary school are significantly higher than for those schools with greater pupil numbers. This is reflected in the high ‘per pupil’ funding at Cymer Afan Comprehensive school which is significantly higher than the average for the Council’s schools (table 18). This cost has increased annually and since 2015/16 ‘per pupil’ funding at Cymer Afan Comprehensive School has exceeded the average for the Council’s schools by nearly 60%.

Table 18

	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Cymer Afan Comp.	£5,613	£6,054	£6,325	£6,344	£6,861	£7,156	£7,156	£7,111
Local Authority Average	£4,179	£4,240	£4,384	£4,441	£4,438	£4,480	£4,484	£4,476

The ‘per pupil’ costs at the new school at Margam, scheduled to open in 2018, will be at or below the local authority average. Based on the local authority

average alone there will be annual revenue saving of £2,635 per pupil. With 226 pupils currently on roll, this equates to a total annual saving of c.£595k.

Costs associated with compulsory redundancy will not be known until all redeployment opportunities have been fully explored. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council via an employers' pledge. The Council has a proven track record for supporting staff in such situations. However, in the highly unlikely event of the compulsory redundancy of all teaching and support staff currently employed at Cymer Afan Comprehensive School then, based on the current staff structure, the estimated total redundancy cost amounts to c.£458k. Redundancy costs incurred as a result of the closure of Cymer Afan Comprehensive school are 'one-off' payments and are not annually recurring charges.

The proposal will result in an additional recurring revenue cost of c.£76k associated with the provision of home to school travel. This figure has been estimated on the basis of all pupils transferring from Cymer Afan Comprehensive School to the new school at Margam and the provision of transport current prices.

Closing Cymer Afan Comprehensive school will remove c.£3m of backlog maintenance and accessibility liabilities.

Revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis, and that recurring revenue costs are both predictable and clearly expressed. The funding formulas for the primary and secondary sectors were last revised in 2011. Consultation is currently underway on a proposed revision to the primary sector formula.

The new school at Margam will be funded according to the Council agreed formula for allocating school budget shares which will reflect the number of pupils on roll including additional pupils as a result of this proposal.

Revenue savings for reinvestment into the education budget will be as a result of efficiencies in terms of cost of delivery through economies of scale; the new school at Margam will be a large school. In this regard, the proposal supports the Council's effective management of its education budget and promotes the more equitable distribution of funding across local secondary sector schools.

The cost of the £30m new build investment at the new school at Margam is not dependent on this proposal.

As part of the consultation process consideration will be given to alternative use of the vacated site, including its resale and/or its demolition; estimated values and costs of which have yet to be calculated.

8. Consultation Details

The purpose of this consultation document is to provide information and to invite views on the future of secondary education in the upper Afan Valley which is being brought forward under a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive School, to receive their secondary education at the new school at Margam.

Those being consulted are the pupils, parents, governors and staff of the schools directly affected, as well as other interested parties. A copy of this consultation document will be provided to all those required in accordance with the School Organisation Code 2013. A list of interested parties being consulted is provided under Appendix A.

Consultation will take place during the period: 11th December 2017 to 14th February 2018.

Views can be expressed in writing (and additional information sought) either by letter, e-mail or completion of the comment form attached to this document. Responses are to be received no later than Wednesday, 14th February 2018 and should be sent to:

- ***Aled Evans, Director of Education Leisure and Lifelong Learning, Civic Centre, Port Talbot SA13 1PJ (marked for the attention of Debora Holder) or***
- ***e-mail: ssip@npt.gov.uk***

The following consultation events have been arranged which will provide an opportunity to ask questions about the proposal:

Wednesday 17th January 2018	
3.45pm	Staff – Federated Schools of the Upper Afan Valley
5.30pm	Governing Body - Federated Schools of the Upper Afan Valley

Thursday 18th January	
5.00pm	Parents/carers - Federated Schools of the Upper Afan Valley

Monday 29th January	
5.30pm	Governing Body – The new school at Margam

Monday 5th February	
6.00pm	Communities of the upper Afan Valley

Pupils will be consulted during the course of the school day at a time which causes least disruption to teaching and learning.

9. The legal matters

Neath Port Talbot County Borough Council is the proposer and the Council wishes to hear the views of all interested parties before deciding whether to progress its proposal. All responses to this consultation will be considered when making its decision and a consultation report will be published following the end of the consultation period. The consultation report will summarise the issues raised by consultees and include a response. The consultation report will also set out Estyn’s view on the proposal.

Having considered the views expressed by interested parties, if the Council decides to proceed it will publish a statutory notice of its proposal, allowing 28 days for the submission of objections. The Council’s Cabinet Board will only consider objections submitted during this period.

Please note that only written objections submitted during the statutory notice period will be considered. Comments submitted as part of this consultation will need to be re-submitted in writing during the statutory notice period if they are to be considered as objections.

If there are no objections then, subject to Education, Skills and Culture Cabinet Board approval, the proposal will be implemented on 1st September 2019. If objections are received, an objection report will be published following the end of the objection period. The report will summarise each objection raised and provide a response.

If objections have been raised, the Council is required to determine the proposal and the matter will go before the Council’s Cabinet Board for decision. In its decision taking, the Council’s Cabinet Board will give due consideration to any objections raised alongside the case for the proposal. The proposal will be determined in line with the requirements of the School Standards and Organisation (Wales) Act 2013 and associated School Organisation Code 2013.

Process timetable

The main activities and actions, and the dates/periods that they are scheduled to take place is set out below.

What	When
Consultation period	11 th December 2017 – 14 th February 2018
Consultation report published	Within 13 weeks of end of consultation, i.e. before 16 th May 2018
Publication of proposal	Within 26 weeks of end of consultation, i.e. before 15 th August 2018
Period for submitting objections	28 days from date of publication of the proposal
Determination	Within 16 weeks of the end of the objection period
Objection report published & decision notification	At the same time as the determination decision is published and within 7 days
Proposed implementation date	1 st September 2019

Consultees

Cymer Afan Comprehensive School, together with the other federated schools of the upper Afan Valley	Pupils Parents Federated school staff Federated governing body School community groups/users
Other schools	NPT schools Maesteg School
Trade Unions	Regional Organisers
Secondary Head Teachers' Group Primary Head Teachers' Group	NAASH LLAN
NPT Schools Forum	
NPT Elected Members	All
Town/Community Council	Pelenna
AM for Aberafan AM for Neath	David Rees Jeremy Miles
Regional AMs (South Wales West)	Suzy Davies Bethan Jenkins Caroline Jones Dai Lloyd
MP for Aberafan MP for Neath	Stephen Kinnock Christina Rees
Bordering Authorities	Swansea Bridgend Carmarthenshire Powys Rhondda Cynon Taf

Faith school education authorities

The Diocese of Menevia
The Diocese of Llandaff

Regional Education Consortium

ERW

Estyn

Children & Young Person Partnership
(incl. Early Years Development and Childcare)

Communities First Partnership

NPTC Group

Neath Port Talbot 14-19 Network

SEN Partners

Action for Children
Child & Adult Mental Health
Services (CAMHS)
Consultant Community
Paediatrician
The Children's Centre NPT Hospital
(Physiotherapy)

NPTCBC Integrated Transport Unit

Police & Crime Commissioner

Alun Michael

WG Schools Management Division

This page is intentionally blank

Comment Form

Please provide your comments on the future of secondary education in the upper Afan Valley under a proposal being brought forward to make provision at the new school at Margam for pupils who would otherwise receive their secondary education at Cymer Afan Comprehensive School and to close Cymer Afan Comprehensive School.

Your comments/suggestion (incl. alternative proposals)

--

Alternatively, you may wish to indicate which of the following reflects your views:

	Please tick
I do not feel strongly one way or the other	
I support the proposal	
I do not support the proposal	

Please confirm that you are:

- School Staff name of school
- Governor name of school
- Parent name of school

Other (please state) _____

Please tick the box if you wish to be informed that the consultation report is available

Name _____ Date _____

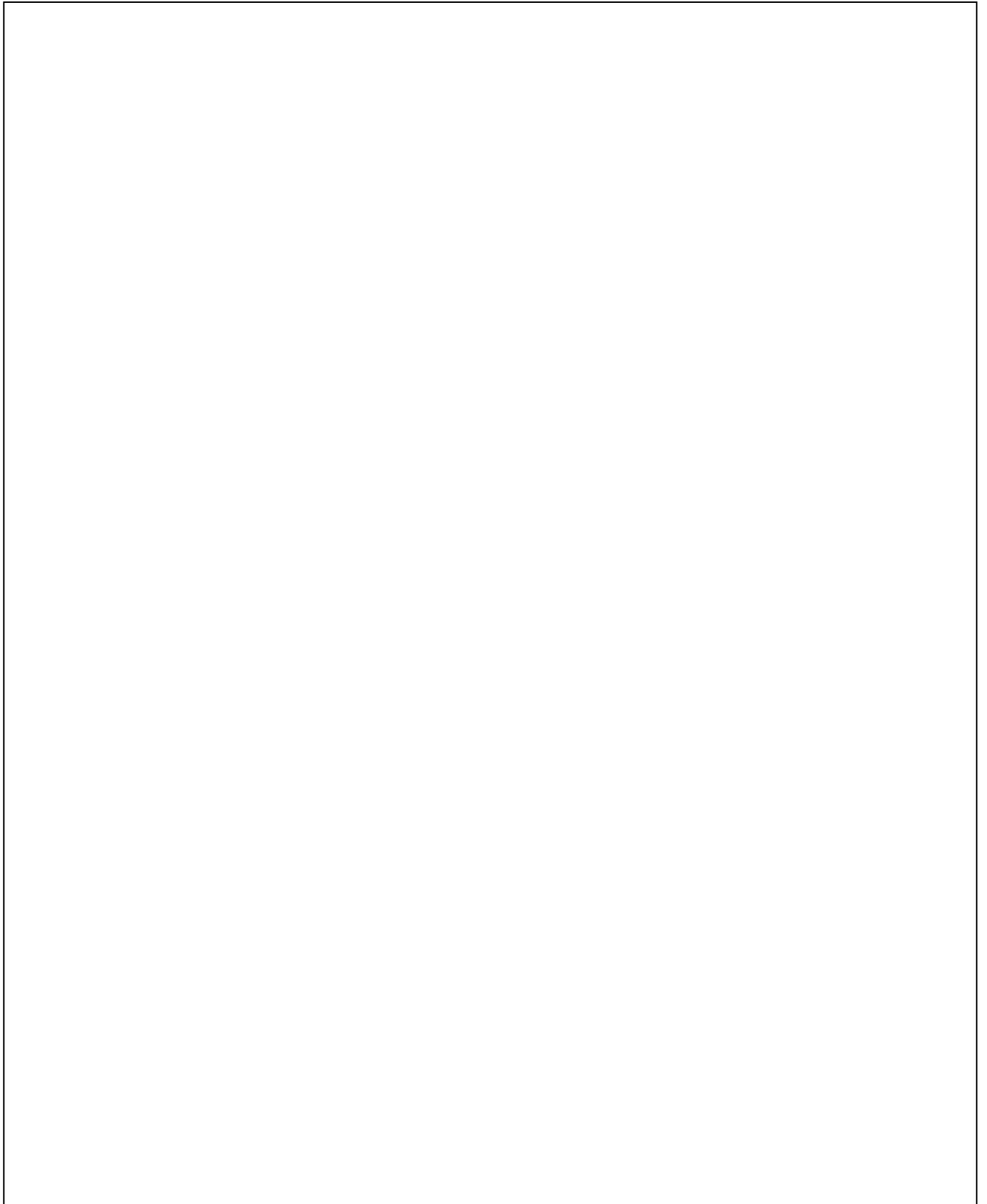
Address _____

Please detach this form and return to:

Director of Education Leisure and Lifelong Learning, Civic Centre, Port Talbot SA13 1PJ (marked for the attention of Debora Holder) or you can e-mail your comments to: ssip@npt.gov.uk

All comments must be received by **no later than 14th February 2018**

Additional comments/suggestions



NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

CABINET

20th June 2018

DIRECTOR OF EDUCATION, LEISURE AND LIFELONG LEARNING

ALED EVANS

MATTER FOR DECISION

WARDS AFFECTED: Cymmer, Glyncorrwg, Gwynfi, Margam, Taibach, Port Talbot, Bryn & Cwmafan, Pelenna

STRATEGIC SCHOOL IMPROVEMENT PROGRAMME – FUTURE OF SECONDARY EDUCATION IN THE UPPER AFAN VALLEY

Purpose of report

1. To obtain Cabinet approval to publish a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil, and to close Cymer Afan Comprehensive.
2. Publication of the proposal provides a 28th day period for the submission of objections. Following the period for submitting objections, Cabinet will need to meet to consider objections

received before taking a decision as to whether or not the proposal should be implemented.

3. This Cabinet report needs to be read in conjunction with the consultation report (appendix A), the consultation document (appendix B) and the Education, Skills and Culture Cabinet Board¹ report of November 2017 (appendix C).

Executive summary

4. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. 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 in order to ensure future provision is sustainable.
5. Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive school as part of a federation of five schools, four primary and one secondary.
6. Cymer Afan Comprehensive is a small secondary school. A school with 600 pupils² or fewer is generally regarded as a small secondary school. Currently, Cymer Afan Comprehensive school has 229 pupils on roll. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status.
7. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for approx. 640 pupils but with 229 pupils on roll³ it is carrying over 64% surplus capacity.

¹ Education, Skills and Culture Cabinet Board: for full report – see ‘List of background papers’

² Estyn 2013: ‘School Size and Education Effectiveness’

³ School census – January 2018

8. In the current financial year⁴, Cymer Afan Comprehensive school receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average. This compares to £7,111⁵, per pupil during the previous financial year, approx. 60% above the average.
9. Cymer Afan Comprehensive school has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, with many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years.
10. There is suitable, alternative English-medium provision available within the County Borough at Ysgol Cwm Brombil, which offers a new build 21st Century school, and at Cefn Saeson Comprehensive school. There is also suitable English-medium provision at Maesteg Comprehensive school.
11. The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Cwm Brombil, Margam, a £30m investment by the Council in a new build school with 21st century school facilities. The business case for the establishment of this school is not dependent on the closure of Cymer Afan Comprehensive school.
12. At its meeting of 9th November 2017 the Council's Education, Skills and Culture Cabinet Board approved consultation on the future of secondary education in the upper Afan Valley

⁴ School budget share allocation: 2018/2019

⁵ School budget share allocation: 2017/2018 as reported in the consultation document

13. The consultation document invited 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. This report was published on 15th May 2018.

Background

14. 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 21st 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 in order to ensure future provision is sustainable.
15. 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.
16. The Council has decided to review its provision on the basis of:
 - educational standards
 - the need for places and the accessibility of schools

- the quality and suitability of school accommodation
- effective financial management

The Proposal

17. Consultation on the future of secondary education in the upper Afan Valley is being brought forward under a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school, School Road, Cymmer, Port Talbot SA13 3EL to receive their secondary education at Ysgol Cwm Brombil, Bertha Road, Margam, Port Talbot, SA13 2AN and to discontinue Cymer Afan Comprehensive school.
18. If approved the proposal will take effect on the 1st September 2019 with Cymer Afan Comprehensive school closing on 31st August 2019.
19. Ysgol Cwm Brombil is a new 3-16 'all-through', middle school, opening on 1st September 2018 in a new build facility in Margam, Port Talbot. Ysgol Cwm Brombil replaces Dyffryn School and Groes Primary School which are both due to close on 31st August 2018.

Consultation

20. 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, July 2013, which specifies the procedures to be followed, including the content of the consultation document, those to be consulted and timeframes.

21. Consultation on this proposal commenced on 11th December 2017 with comments invited until 14th February 2018. Consultees specified in the School Organisation code were e-mailed the consultation document. In line with current practice, the school managed distribution to parents of the federated schools and included the document on the respective websites.
22. As Ysgol Cwm Brombil, the receiving school, has yet to open - this is scheduled for September 2018, preparations for its opening are being managed by a temporary governing body set up for this specific purpose. The temporary governing body, which includes parent and community governors, has been consulted.
23. Although not a formal requirement, consultation meetings were held with:

Table 1

Who	When
School staff of the federated schools of the upper Afan Valley	17 th January 2018
Governing Body of the federated schools of the upper Afan Valley	17 th January 2018
Parents/carers of pupils of the federated schools of the upper Afan Valley	18 th January 2018
Pupils from years 5, 6, 7, 8,9, 10 and 11 of the federated schools of the upper Afan Valley	26 th January 2018

Temporary Governing Body of Ysgol Cwm Brombil	29 th January 2018
Communities of the upper Afan Valley	5 th February 2018

24. Pupil views were gathered in line with the guidance issued by Welsh Government on consultation with children and young people, taking into account the United Nations Convention on the Rights of the Child (UNCRC) in particular, Article 12: ‘Your right to say what you think should happen and be listened to’ and Article 13: ‘Your right to have information’.
25. The school selected representative groups of pupils (Y5 – Y11) from across the federation to express their views directly in face to face meetings with the Council, the notes of which are available in the consultation report (*appendix E*). A pupil consultation document was made available to the federated schools again, managed by the school staff in order to assist with explanation and understanding. The number of written pupil responses evidences a high level of pupil engagement.
26. The consultation requirements of the Code have been met with the turnout at meetings and the written responses to consultation further evidencing this.
27. 3137 written responses were received. Of these, a total of 943 pro forma comment forms were received; these are the standardised response forms provided with the consultation document. Table 2 below shows how the respondents using the pro forma identified themselves and the respective number of forms received. Many respondents submitted more than one comment form, some with different comments.

Table 2

Pupils	38	Residents	104
Parents/Carers	284	Past pupils	117
Staff	11	Others	103
Governors	6	Unspecified	59
Pupils' relatives	221		

28. In addition to the pro forma comment forms, 2194 letters were received.
29. 1916 of these comprised multiple copies of 8 standardised letters, with many respondents signing each of the 8 standardised letters.

Table 3

Standardised letter No.1	27	Standardised letter No.5	359
Standardised letter No.2	361	Standardised letter No.6	361
Standardised letter No.3	357	Standardised letter No.7	74
Standardised letter No.4	363	Standardised letter No.8	14

30. 278 comprised individual letters or emails. Table 4 and table 5 below shows how the respondents identified themselves and the respective number of hard copy letters/e-mails received.

Table 4

Pupils	93	Pupils' relatives	12
Parents/Carers	39	Residents	42
Staff	30	Past pupils	25
Governors	6	Unspecified	16

31. 15 of the individual letters received were from the following respondents.

Table 5

Estyn	Trade Unions x 3 (NASUWT, Unison, National Education Union Cymru)
Upper Afan Valley Federation of Schools Governing Body	Cllr Scott Jones (x 2) and Cllr Ralph Thomas
Afan Federation Support and Action Group x3	Stephen Kinnock MP
Cymmer Afan Community Library	David Rees AM
Afan Valley Community Leisure	Bethan Jenkins AM

32. The Council is aware of an online petition against the closure of Cymer Afan Comprehensive school which has in excess of 1500 signatures.
33. Written responses to the consultation are available for Members to peruse at Port Talbot Civic Centre as from 14th June 2018.
34. For Members' consideration, the consultation report summarising the comments of consultees together with officer responses to the issues raised is attached (appendix A) and should be read in conjunction with this report.
35. Members are reminded that comments should be conscientiously considered in an open minded approach, alongside the case put forward for publication of the proposal. In this respect there is an expectation that Members will have read

and given due regard to the proposal as consulted upon and the comments received together with officer comments.

36. The consultation report has been made available to those required by the Code, including respondees who requested a copy with the latter being contacted either by e-mail or post advising of the link to the report on the Council's website. A summary consultation report has been made available for pupils.

Consultation - summary response

37. Comments received relating to the proposal fell under the following broad headings:

- Education
- Federation
- Transport and travel
- 21st century build projects
- Building condition and size
- Wider community
- Consultation quality
- Finance
- Alternative school organisation

– Education

38. Many comments received related to standards attained at Cymer Afan Comprehensive and expressed concerns as to whether pupils who transfer to Ysgol Cwm Brombil under this proposal would make progress and achieve the same standards and outcomes.
39. Data gathered on both Cymer Afan Comprehensive and Dyffryn School, which is the school currently attended by secondary phase pupils who will transfer to Ysgol Cwm Brombil, reveals that at Dyffryn School pupils consistently attain good GCSE

results. In 2016 Dyffryn School was the highest performing school in Neath Port Talbot.

40. Dyffryn School also has a good track record of supporting pupils with additional learning needs (ALN) and offers a wide range of support and intervention to meet a variety of needs.
41. There is no evidence available to prove that smaller schools produce better results, that pupil wellbeing is higher, or that larger schools mean that all pupils will be taught in larger classes. There is also no reason why Cymer Afan Comprehensive pupils should experience bullying or victimisation if they move to Ysgol Cwm Brombil.
42. Ysgol Cwm Brombil will offer pupils many opportunities that would not be possible in a smaller school and have already planned for a student services hub which will ensure that, even in a larger school, individual pupils will be able to access support and guidance when needed.
43. It is the case that this proposal could cause disruption for some pupils, particularly those who in year 10 and 11 at the time of transfer and who may be preparing for external examinations. However should the proposal be approved then work will be undertaken between both schools and local authority officers to ensure that disruption is kept to a minimum and that pupils are fully supported through the transition period.
44. Additional commentary specific to education can be found on pages: 10, 11 & 23 – 32 of the consultation report (appendix A).

- **Federation**

45. Concern had been expressed that the closure of Cymer Afan Comprehensive would undermine the federation of schools in the upper Afan Valley which would lead to the closure of primary schools too. Currently, the Council has no plans to close any of the four primary schools which make up the federation of schools of the upper Afan valley and it is expected that the primary schools will still have much to gain from remaining in a federation.
46. Transition between key stages 2 and 3 is acknowledged to be a successful aspect of the upper Afan Valley federation. However, with thorough planning there is no reason to assume that transition should not take place as effectively as current arrangements, in the same way as it is successfully managed elsewhere where children live some distance away from their secondary school.
47. Additional commentary specific to federation can be found on pages: 11, 12 & 32 - 34 of the consultation report (appendix A).

- **Transport and Travel**

48. It is the case that under this proposal, pupils from the upper Afan Valley will have further to travel for their secondary education and that this will involve longer journey times. The Council will provide free transport for pupils living in the upper Afan Valley to Ysgol Cwm Brombil. The distance between the furthest community in the upper Afan Valley and Ysgol Cwm Brombil is approx.13 miles with a journey time, including stops, of approx. 45 minutes. Despite the misgivings of many respondents, the evidence overall does not suggest that this represents an unreasonable journey time for secondary aged pupils to travel. Initial assessments conclude that the route is suitable and prior

to a transport contract being awarded all necessary safety and safeguarding checks will be made.

49. It is the responsibility of parents/carers to make sure that their child catches the bus on time every day, and to attend school after medical appointments. Families would not be penalised for a pupil's late attendance at school where the delay has been caused by heavy traffic, unexpected road works, or other unforeseen circumstance which causes authorised home to school transport to be late.
50. Pupils from the upper Afan Valley will be given equal opportunity to take part in extracurricular activities and it will be the responsibility of the senior staff and Governing Body of Ysgol Cwm Brombil to manage this appropriately. This is the case in every secondary school in Neath Port Talbot, including those where distance between home and school involves a bus journey.
51. Additional commentary specific to transport and travel can be found on pages: 12, 13, 14 & 34 – 45 of the consultation report (appendix A).

- **21st Century Build Projects**

52. There is a growing body of research available which emphasises that the impact of the learning environment on pupil progress can be significant, and that the benefits of a new build school with increased natural light, better acoustics, and greater natural outdoor spaces can greatly enhance the teaching and learning experience for pupils and staff.
53. Ysgol Cwm Brombil is intended to accommodate 210 primary age pupils (plus nursery) and 1200 secondary aged pupils.

There is sufficient space at the new build school to accommodate primary aged pupils from Groes Primary and secondary aged pupils from the existing catchment area of Dyffryn School, together with additional pupils from elsewhere. Should it be the case that pupils from the upper Afan Valley do not attend Ysgol Cwm Brombil, there are a number of alternative options for making use of the accommodation available, which will be subject to separate consultations should the need arise.

54. Funding for a new school via the Welsh government's 21st Century Schools Programme requires that 50% of the costs are met by the Council. With limited resources the Council is required to make best use of the funding it has available and to deal with the highest priority schemes first. It will also need to be mindful of getting value for money from its capital build expenditure. Supporting a new build, small secondary school could not be considered to represent good value based on the business case for a scheme with disproportionately high revenue and life-cycle costs.
55. Additional commentary specific to 21st Century School projects can be found on pages: 14 & 46 – 50 of the consultation report (appendix A).

– **Building Condition and Size**

56. The Council regularly surveys the condition of school buildings in order to ensure schools remain operational and that business continuity can be maintained. It identifies areas that need maintenance and repair together with any refurbishments that are required to keep the buildings operational, including access for people with disabilities. Across the Council's school estate, this work is then prioritised with the highest priority schemes being tackled first. The Council's surveys have been sampled

and independently checked by private sector consultants appointed by the Welsh Government.

57. There are many more schools in Neath Port Talbot in need of maintenance and repair than the Council's resources can deal with. Even after the £123m joint investment in NPT schools through its Strategic School Improvement Programme and Band A of the Welsh Government's 21st Century Schools Programme there will remain an estimated backlog of repair costs across the Council's school building portfolio of c.£75m despite also spending c.£1.2m annually on maintenance and repair. The costs at Cymer Afan Comprehensive school amount to c.£3m. Maintenance and repair keep a school operational; in brief, the work keeps the building safe, warm and watertight. Importantly, it does not provide a new facility that meets the standards expected at a new build school.
58. All schools will have access to their condition surveys and are supported by a multi-disciplinary team of technical staff to manage maintenance issues. A dedicated building surveyor is assigned to the school to monitor and respond to building maintenance matters. Cymer Afan Comprehensive school has had c.£370,000 of repair and maintenance works carried out since 2014.
59. Additional commentary specific to building condition and size can be found on pages: 14, 15 & 50 – 52 of the consultation report (appendix A).

- **Wider Community**

60. Prior to consultation, a Community Impact Assessment was completed in line with the requirements of the School

Organisation Code⁶. The assessment found that there are opportunities to relocate community based activities from the school to alternative locations in the upper Afan Valley. Further details can be found in the section in this report on community impact (paras: 108 – 110).

61. The effect of the proposal will be to transfer delivery of secondary education to Ysgol Cwm Brombil. It does not seek to remove education from the upper Afan Valley. The current four primary schools which, together with Cymer Afan Comprehensive, make up the existing federation are not under review and it is expected that these schools will remain federated and continue to provide pupils and staff with the benefits of federation within the communities where they are sited.
62. The Council's investment in education in the upper Afan Valley although modified, will continue. Similarly, the investment in secondary education continues with education provision being made for the pupils of the upper Afan Valley although delivered outside the upper Afan Valley.
63. The proposed Afan Valley Adventure Resort is at the very early stages of development and does not have any direct relation to this proposal. There are no plans to sell the school land to the developers for the scheme.
64. Cymer Afan Comprehensive is a large employer, although many of its employees live outside the upper Afan Valley. The Council has a good track record on redeployment and will be working hard to secure the future employment of staff at risk of redundancy.

⁶ School organisation Code - see 'List of background papers'

65. Additional commentary specific to the wider community can be found on pages: 15, 16 & 52 – 56 of the consultation report⁷ (appendix A)

- **Consultation Quality**

66. Consultation on the future of secondary education in the upper Afan Valley has followed the procedures required under the Welsh Government's School Organisation Code. This specifies the type of school organisation activity on which the Council is required to consult and the process to be followed in conducting consultation, including who it is required to consult.

67. It has been suggested that the consultation process was flawed, that it is unlawful, that information has not been made readily available to interested parties and that Neath Port Talbot Council cannot be an impartial judge of the responses it receives from the consultation as it has a vested interest in the closure of Cymer Afan Comprehensive school in order to satisfy the requirements of the business plan for Ysgol Cwm Brombil.

68. The consultation process has resulted in over 3000 written responses and the turnout for all meetings has been high, suggesting that there was an appropriate level of stakeholder awareness and engagement.

69. In the case of Ysgol Cwm Brombil, funding for the new build school relies on a combination of Welsh Government 21st Century Schools capital grant support and match funding from the Council. The Council's match funding element for Ysgol Cwm Brombil is not dependent on the proposal currently being

⁷ Consultation report is available on the Council's website: <https://www.npt.gov.uk/1891>

consulted upon, i.e. the closure of Cymer Afan Comprehensive school. The current consultation on the future of secondary education in the upper Afan Valley is separate to the business case process and a decision on the outcome of that consultation does not impact on the establishment of Ysgol Cwm Brombil. In the opinion of officers the decision-making of elected Members is, therefore, not compromised.

70. Pupil consultations conducted as part of this consultation together with the supporting pupil consultation document followed the guidance issued by Welsh Government in the 'School organisation: consultation with children and young people' 2013 and the framework provided by the National Standards for Children and Young People's Participation in Wales. A separate consultation document for pupils is not a statutory requirement; however it is considered to be good practice and is an established part of the process in Neath Port Talbot. A pupil consultation document was made available for this proposal for the schools to use with their pupils as was felt appropriate.

71. Additional commentary specific to consultation quality can be found on pages: 16, 17, 18 & 56 – 62 of the consultation report⁸ (appendix A).

- Finance

72. Schools are funded for their 'day to day' running mainly from money allocated directly by the Council and by means of targeted support from Welsh Government grants as they become available from time to time. Federating the schools in the upper Afan Valley and operating them under the management of one governing body has allowed the budgets for

⁸ Consultation report is available on the Council's website: <https://www.npt.gov.uk/1891>

the five individual schools to be 'pooled' and the money to be used where needed most. Federation has meant more of the combined schools' resources can be allocated for teaching and learning as all five schools are funded as though there was a head teacher employed at each school. With only the cost of a single head teacher to meet, the remaining money is available to be used elsewhere in the schools.

73. Funding the five schools by way of a federation is an investment by the Council in keeping education in the upper Afan Valley. Added to which the schools also benefit from small school funding supplement and protection. The level of funding per pupil is generous compared to other schools in the County Borough. Despite a view held by some consultees, the Council's proposal is not about cost saving as the money will be reinvested within education. The efficiencies from educating secondary age pupils from the upper Afan Valley at Ysgol Cwm Brombil will be ring fenced for reinvestment within education. As such, there is no reduction in education expenditure overall. Cost is not more important than quality but delivering education has a cost and this needs to be managed more equitably across schools in the County Borough. The levels of need experienced in the upper Afan Valley are similarly present in other areas of NPT.

74. Additional commentary specific to finance can be found on pages: 18, 19 & 62 – 65 of the consultation report (appendix A).

- Alternative school organisation

75. Consultees have requested that consideration be given to a range of options for alternative school organisation in the upper Afan Valley. These consisted of options that involved new school builds, transfer of other secondary schools to the upper

Afan Valley, the remodelling of existing premises and combinations of all, together with proposals for a 'hub' of community services. Each option has been individually assessed and the evaluations are set out in detail in the consultation report.

76. The evidence from the options assessed shows that the existing site areas of upper Afan Valley schools are insufficient in size to accommodate the requirements of most of the proposed school configurations. This has a direct impact on any plans to create a 'hub' of services, particularly where additional accommodation onsite is sought.
77. Given the constraints identified in the alternative options that were considered, a 'hub' based on a primary school only model presents greater opportunity in relation to meeting space and traffic requirements, and cost effectiveness and efficiency.
78. None of the options presents as a viable school organisation arrangement that would maintain delivery of secondary education in the upper Afan Valley. As such, no alternative option is recommended to Members for consideration.
79. Additional commentary specific to alternative school organisation can be found on pages: 19 & 65 – 89 of the consultation report (appendix A).

Estyn Response

80. It is Estyn's view that overall the proposal is likely to at least maintain the standards of education and provision in the area. In addition, Estyn comments that the proposal asserts reasonably that Cymer Afan Comprehensive school is a small

school and is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils.

81. Estyn considers that appropriate reference is made to the outcomes of the school's most recent Estyn inspection in April 2015 in which it is identified that both the current performance and the prospects for improvement were judged to be adequate and that in November 2016 the school was judged to have made good progress in respect of the key issues for action.
82. The full response is included as appendix D.

Consideration of the proposal

83. The proposal consulted upon seeks to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at a new build school in Margam, Ysgol Cwm Brombil, and to close Cymer Afan Comprehensive.
84. Although the case for maintaining Cymer Afan Comprehensive in the upper Afan Valley has been clearly voiced by those opposed to the proposal it is the opinion of officers that alternative options presented to the Council for consideration do not represent acceptable alternative models.
85. In addition, comments opposing the proposal do not, on balance, present a convincing argument suggesting its modification or abandonment.
86. As such, the case for the proposal remains strong and it is recommended that the proposal be progressed to the next stage without amendment.

Formal procedures

87. To progress to the next stage, publication of the proposal in the form of a statutory notice is required, allowing 28 days for objections to be submitted.
88. This period will provide a further opportunity to give consideration to and endeavour to resolve concerns that might otherwise give rise to objections.
89. Objections submitted during the four week statutory period will be reported to Cabinet to inform determination on the proposal.

Table 6

What	When
Decision to publish proposal	20 th June 2018
Publication of Statutory Notice	26 th June 2019
Period for submitting objections	26 th June 2018 – 23 rd July 2018
Proposed implementation date	1 st September 2019

Pupil numbers and school accommodation capacity

– *Cymer Afan Comprehensive school*

90. There has been a 35% (122) fall in pupil numbers⁹ over the past ten years with a 2016 low of 210. Pupil numbers for this period are shown in table 7 below.

⁹ Pupil numbers updated to reflect the school census return - January 2018

Table 7

Cymer Afan Comp.										
	Annual census - January									
Year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Pupil Nos.	351	326	302	288	266	244	216	210	213	229

91. Forecasts based on January annual census returns suggest a potential increase of 42 pupils by 2024 (table 8). However, even then Cymer Afan Comprehensive will still be a small secondary school with numbers returning only to 2012/2013 equivalent levels.

– **Surplus capacity impact**

92. With the physical capacity to accommodate 641 pupils the school has a significant surplus capacity of c.64% (412 places). The forecasted pupil numbers at 2024 would still leave the school with c.58% surplus capacity and, notionally over half empty. This level of surplus capacity has revenue and capital costs associated with maintaining the school.

– **Ysgol Cwm Brombil**

93. Ysgol Cwm Brombil is a new, 21st century build, 3-16, 'all-through' middle school with capacity to provide for 1200 secondary age pupils. (It will also provide for 210 full-time primary age pupils, 45 nursery age pupils specifically from the catchment area currently served by Groes Primary school.) It is an English-medium community school which has room to accommodate pupils from the upper Afan Valley (table 8 below).

94. A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-

esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range.

Table 8

<i>The new school at Margam (secondary school capacity = 1200).</i>							
	<i>Annual census January</i>	<i>January forecasts</i>					
Year	2018	2019	2020	2021	2022	2023	2024
Est. pupil numbers	783 (Dyffryn School)	835	865	845	845	854	845
Cymer Afan Comp.	n/a	n/a	268	273	264	262	271
Total:	n/a	835	1,133	1,118	1,109	1,116	1,116

Financial impact

95. The cost of the £30m new build investment at Ysgol Cwm Brombil is not dependent on this proposal.
96. Revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis, and that recurring revenue costs are both predictable and clearly expressed. The funding formulas for the primary and secondary sectors were revised in 2018 & 2011 respectively.
97. Revenue costs associated with maintaining a small secondary school are significantly higher than for those schools with greater pupil numbers. This is reflected in the high 'per pupil' funding at Cymer Afan Comprehensive school which is significantly higher than the average for the Council's schools (table 9). At Cymer

Afan Comprehensive school this cost exceeds the average for the Council's secondary sector schools by nearly 55%.

Table 9

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Cymer Afan Comp.	£6,054	£6,325	£6,344	£6,861	£7,156	£7,156	£7,111	£6,822
Local Authority Average (inc. Cymer Afan Comp.)	£4,240	£4,384	£4,441	£4,438	£4,480	£4,484	£4,476	£4,418

98. The 'per pupil' costs at Ysgol Cwm Brombil, scheduled to open in 2018, will be at or below the Council's secondary sector average. Based on the average per pupil costs for 2018/2019 this proposal will deliver a potential 'per pupil' revenue saving of £2,404. With 229 pupils currently on roll, this is equivalent to c.£551k.
99. Ysgol Cwm Brombil will be funded according to the Council agreed formula for allocating school budget shares which will reflect the number of pupils on roll including additional pupils as a result of this proposal.
100. Revenue savings for reinvestment into the education budget will be as a result of efficiencies in terms of cost of delivery through economies of scale; Ysgol Cwm Brombil will be a large school. In this regard, the proposal supports the Council's effective management of its education budget and promotes the more equitable distribution of funding across local secondary sector schools.

101. There will be an additional recurring revenue cost of c.£76k associated with the provision of home to school travel. This figure has been estimated on the basis of all pupils transferring from Cymer Afan Comprehensive to Ysgol Cwm Brombil and provision at current transport prices.
102. Costs associated with compulsory redundancy will not be known until all redeployment opportunities have been fully explored. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council via an employers' pledge. The Council has a proven track record for supporting staff in such situations. However, in the highly unlikely event of the compulsory redundancy of all teaching and support staff currently employed at Cymer Afan Comprehensive school then, based on the current staff structure, the estimated total redundancy cost amounts to c.£458k. Redundancy costs incurred as a result of the closure of Cymer Afan Comprehensive school are 'one-off' payments and are not annually recurring charges.
103. Plans for a vacated Cymer Afan Comprehensive school site have not yet been developed. The school site is owned by the Council and any future use will be considered within the context of the Council's corporate asset management process. If the site or part of the site is sold the monies raised will be reinvested into the general education budget.
104. Additional commentary specific to finance can be found on pages: 18, 19 & 62 – 65 of the consultation report (appendix A).

Equality impact assessment

105. An Equality Impact Assessment (EIA) 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, and the Well-being of Future Generations (Wales) Act 2015 the Environment (Wales) Act 2016).
106. The current EIA is attached as appendix E. It is important that Members read the EIA for the purposes of this meeting. Members should note that work on the EIA is an ongoing process and the current EIA will be revisited as it becomes further informed by the objection period, should that be approved. A fully completed EIA will be put before Members prior to any final decision being taken on whether or not the proposal is to be implemented. The impact on different protected groups, together with the three equality needs to which Members must have regard are set out in the EIA.
107. In response to the Well-being of Future Generations (Wales) Act 2015 the Council has set three strategic objectives which contribute to the seven national well-being goals that the Welsh Government requires all public bodies in Wales to contribute to, in order to achieve 'the Wales we want'.
108. The Council's well-being objectives and the supporting improvement priorities are set out in the Council's Corporate Plan. This proposal directly contributes to Well-being Objective 1 – 'To improve the well-being of children and young people', as it seeks to increase the

opportunities for young people from the upper Afan Valley through delivering a 21st century learning environment, an environment that will provide pupils with a wider range of facilities and contribute to raising aspirations. It aims to ensure that pupils are equipped with the skills, the behaviours and the support they need to make progress and to contribute socially and economically to the national well-being goal of a prosperous Wales.

109. The proposal seeks to reduce inequality of educational provision for pupils in the upper Afan Valley, ensuring that learning experiences are improved and that they are able to access the resources and facilities that would otherwise not be available to them. An example of this would be through the technological investment planned for Ysgol Cwm Brombil which they will be part of should this proposal be approved.

110. Should a disproportionate impact on a particular protected group be identified, there is no real risk of indirect discrimination as the Council is pursuing a legitimate aim (improving the quality and efficiency of education in the Council's area) and the decision to publish the proposals to discontinue Cymer Afan Comprehensive school is a proportionate means of achieving that aim

Workforce impacts

– School staff

111. There are 23.6 full-time teaching staff and 39 support staff with contracts attached to Cymer Afan Comprehensive school. Pupil teacher ratio is higher than the average for the Council's secondary sector schools (table 10) but this needs to be

interpreted in the context of the arrangements across the federation.

112. Should a decision be taken to close school, staff with contracts attached to Cymer Afan Comprehensive school will be declared redundant. Employees identified at risk of redundancy will be supported by the Council's policies and HR staff.
113. Employment for some may continue within the federation whilst there is also the potential for employment opportunities at the receiving school because of increased numbers.
114. The governing bodies of schools in Neath Port Talbot have pledged to employ redundant staff where possible.

Table 10

	2017
School	9.0
Local Authority	16.6
Wales	16.5

– **Centrally employed staff**

115. Centrally employed staff will be managed via the Council's staff employment processes.

– **Staff support**

116. As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that as a result of school reorganisation some staff take the opportunity to undertake new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting

staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a proven track record for supporting staff in such situations.

Legal impacts

117. Members are referred to Appendix J which sets out in detail the relevant legislation and legal implications relating to a decision on this proposal. It is the view of officers that this report complies with the legislative requirements.
118. The proposal requires the discontinuation of a school. The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement the proposal.
119. The Welsh Government's School Organisation Code imposes on the Council requirements and guidelines on matters relating to school organisation, including consultation.
120. Pupil travel arrangements will be in line with the requirements of the Learner Travel (Wales) Measure 2008; the Learner Travel Statutory Provision and Operational Guidance 2014; and the Council's Home to School Travel Policy 2017.
121. Revenue funding will be in line with the requirements of the School Funding (Wales) Regulations 2010; and the Council's approved formula for funding schools.
122. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.

Risk management

123. A risk assessment has been carried out under the Council's Risk Management Policy 2015.
124. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
125. Potential risk areas in implementing the proposal include:
- resistance to change leading to lack of pupil, parent and staff support
 - educational standards not maintained
 - loss of community facilities
 - increased home to school travel time impacting on attendance and performance
 - staff anxiety about job security
 - negative impact on existing federation
126. Failing to implement the proposal will result in the following teaching/learning and financial benefits not being fully realised, particularly in relation to:
- providing a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils
 - access to a wider range of staff expertise
 - opportunities for wider peer group interaction
 - a more efficient and effective use of resources, and savings from economies of scale
 - greater protection against the impact of a schools funding formula review

- reduction in the number of surplus pupil places

127. The benefits of implementing the proposal will mitigate the effects of identified risks. A new school provides greater prospects for improving educational attainment for pupils.

128. The full risk assessment is attached to this report as appendix F.

Community impact assessment

129. The community impact assessment has been carried out in line with the requirements of the School Organisation Code. This is an assessment of the impact on community usage of those facilities and services currently available at Cymer Afan Comprehensive school. The assessment recognises the importance of Cymer Afan Comprehensive school and the part it plays in the wider community. Community provision and activities that have been developed over an extended period at the school site will be displaced under this proposal; however opportunities exist to relocate activity from the school to alternative locations. The assessment reports that these locations can be enhanced as appropriate with no loss of amenity to the wider community and recommends that plans are put in place to mitigate any loss.

130. Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

131. Should this proposal be implemented then Ysgol Cwm Brombil will serve the upper Afan Valley and its facilities will be available for use by all the communities in its extended catchment area.
132. The community impact assessment is attached to his report as appendix G. It can also be viewed on the Council's website using the following electronic link: <https://www.npt.gov.uk/1891>

Welsh language impact assessment

133. Cymer Afan comprehensive school is an English-medium school as will be Ysgol Cwm Brombil. At English-medium schools Welsh is taught as a second language.
134. Officers are satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive school and that implementing the proposal should result in a positive impact on Welsh language development.
135. At Cymer Afan Comprehensive school the Welsh dimension is strongly supported. There are many valuable opportunities provided to develop pupils' knowledge and understanding of the history, culture and industry of Wales. All pupils follow an appropriate course in Welsh in key stage 4, and a majority of pupils gain a qualification in Welsh at GCSE.
136. Whereas Ysgol Cwm Brombil has yet to open, the experience at Dyffryn School serves as a helpful benchmark as the new school would wish to build on the strengths of existing provision. At Dyffryn School almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This was reported by Estyn to be

strength of the school, who also noted that the school has been effective in promoting positive attitudes to the learning of Welsh.

137. The school is working towards improving pupils' Welsh language skills beyond formal Welsh lessons, and to encourage greater pupil self-confidence when using the language. Pupils' understanding of Welsh culture is developed appropriately through subject topics and activities such as residential trips and the two school eisteddfodau.
138. The full Welsh language assessment is attached to this report as appendix H.

Recommendation

139. Having given due regard to the responses to consultation and the impact assessments in relation to equality, risk, community usage and Welsh language together with the legal implications, it is recommended that, in line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve the statutory publication of a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at Ysgol Cwm Brombil and to close Cymer Afan Comprehensive.
140. The proposed date of implementation to be 1st September 2019.
141. Notice of the proposal to be published on 26th June 2018, allowing 28 days for receipt of objections.

Reasons for proposed decision

142. This decision is necessary to comply with the formal publication requirements of the School Organisation Code and associated legislation. A draft statutory notice is attached as appendix I. Implementation of the proposal will enable the Council to promote high educational standards and the fulfillment of every child's potential. It will also enable the Council to meet its duty to secure efficient education in its area.

Implementation of the decision

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

Appendices

Appendix A: Consultation report

Appendix B: Consultation document

Appendix C: Education, Skills and Culture Cabinet Board report

Appendix D: Estyn response

Appendix E: Equality impact assessment

Appendix F: Risk assessment

Appendix G: Community impact assessment

Appendix H: Welsh language impact assessment

Appendix I: Draft statutory notice

Appendix J: Legal implications

List of background papers

a) Education, Skills and Culture Cabinet Board Report: November 2017

<http://moderngov.neath-porttalbot.gov.uk/documents/s33454/Future%20of%20education%20in%20the%20upper%20Afan%20Valley%20202.pdf>

- b) Consultation document
<https://www.npt.gov.uk/media/8363/future-of-secondary-education-in-the-upper-afan-valley-consultation-document.pdf>
- c) 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/$CAB-240908-REP-EL-KN.doc.pdf)
- d) Welsh Government - School Organisation Code: July 2013
<http://gov.wales/docs/dcells/publications/130719-school-organisation-codes-en.pdf>
- e) School Standards & Organisation (Wales) Act 2013
http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf
- f) Learner Travel (Wales) Measure: 2008 & the Learner Travel Statutory Provision and Operational Guidance: 2014.
http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf
<http://gov.wales/docs/det/publications/140616-ltog-en.pdf>
- g) Home to School Travel Policy: 2017
https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf
- h) Estyn
<https://www.estyn.gov.wales/inspection/search>
- i) School Funding (Wales) Regulations 2010
<http://www.legislation.gov.uk/wsi/2010/824/made>
- j) Council's funding formula
<https://democracy.npt.gov.uk/documents/s34397/ESC%20Cab.Board%20report%20120118.pdf>
- k) Measuring the capacity of schools in Wales
<https://gov.wales/docs/dcells/publications/111104measuringcapacityen.pdf>
- l) Council Corporate Plan 2018-2022
<https://www.npt.gov.uk/media/8917/corporate-plan-2018-22-eng.pdf>
[https://democracy.npt.gov.uk/Data/Cabinet/20111109/Agenda/\\$CAB-091111-REP-EL.doc.pdf](https://democracy.npt.gov.uk/Data/Cabinet/20111109/Agenda/$CAB-091111-REP-EL.doc.pdf)

Officer Contact

Mr Andrew Thomas

Head of Transformation

tel: 01639 763314

e-mail: a.d.thomas@npt.gov.uk

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Education, Skills and Culture Cabinet Board

9th November 2017

REPORT OF HEAD OF TRANSFORMATION ANDREW THOMAS

MATTER FOR DECISION

WARDS AFFECTED: Cymmer, Glyncorrgwg, Gwynfi, Margam, Taibach, Port Talbot, Bryn & Cwmafan, Pelenna

STRATEGIC SCHOOL IMPROVEMENT PROGRAMME – FUTURE OF SECONDARY EDUCATION IN THE UPPER AFAN VALLEY

Purpose of report

1. To obtain Cabinet Board approval to consult on the future of secondary education in the upper Afan Valley.

Executive summary

2. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. 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 in order to ensure future provision is sustainable.
3. Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive school as part of a federation of five schools, four primary and one secondary.
4. Cymer Afan Comprehensive is a small secondary school. A school with 600 pupils¹ or fewer is generally regarded as a small secondary school. Currently, Cymer Afan Comprehensive school has 226

¹ Estyn 2013: 'School Size and Education Effectiveness'

pupils on roll. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status.

5. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for approx. 640 pupils but with 226 pupils on roll it is carrying nearly 65% surplus capacity.
6. At £7,111², 'per pupil' funding at Cymer Afan Comprehensive school is significantly higher (60%) than the average for the Council's schools; equal to c.£2,600 for each pupil or an additional c.£595k allocated to the schools budget share. The average for secondary sector school in Neath Port Talbot is £4,476 whilst the lowest is £3,910.
7. Cymer Afan Comprehensive school has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, with many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years.
8. There is suitable, alternative English-medium provision available within the County Borough at Ysgol Newydd Margam, which offers a new build 21st Century school, and at Cefn Saeson Comprehensive school. There is also suitable English-medium provision at Maesteg Comprehensive school.
9. The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Newydd Margam, a £30m investment by the Council in a new build school with 21st century school facilities.
10. Teaching and learning opportunities are increased in new build, state of the art facilities and an evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Background

11. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education.

² School budget share allocation 2017/2018

Having the right schools in the right place and ensuring that they are fit for the 21st 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.

12. Implementing the Council's 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.
13. The Council has determined to review its provision on the basis of:
 - educational standards
 - the need for places and the accessibility of schools
 - the quality and suitability of school accommodation
 - effective financial management
14. In 2013, the five schools of the upper Afan Valley, namely: Cymer Afan Primary, Croeserw Primary, Glyncorwg Primary, Pen Afan Primary and Cymer Afan Comprehensive (secondary), formed a federation in order to address falling school roles and the consequent reduction in revenue funding.

The Proposal

15. Consultation on the future of secondary education in the upper Afan Valley is being brought forward under a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive School, School Road, Cymmer, Port Talbot SA13 3EL to receive their secondary education at Ysgol Newydd Margam, Bertha Road, Margam, Port Talbot, SA13 2AN and to discontinue Cymer Afan Comprehensive School.
16. If approved the proposal will take effect on the 1st September 2019 with Cymer Afan Comprehensive School closing on 31st August 2019.

17. Ysgol Newydd Margam is a new 3-16 ‘all-through’, middle school, opening on 1st September 2018 in a new build facility in Margam, Port Talbot. (*Ysgol Newydd Margam is a working name for the school, the official name has yet to be determined.*) Ysgol Newydd Margam replaces Dyffryn School and Groes Primary School which are both due to close on 31st August 2018.

Information about Cymer Afan Comprehensive School

18. Cymer Afan Comprehensive School is an English-medium community school for boys and girls aged 11-16 years. Since September 2013 it has been part of a five school federation in the upper Afan Valley.
19. Cymer Afan Comprehensive school is a small school. It is one of only five established mainstream secondary schools in Wales with fewer than 300 pupils, one of which is set to close in 2018.

– Pupil Numbers

20. As at October 2017, there were 226 pupils on roll. There has been a 36% (127) fall in pupil numbers over the past ten years with a 2016 low of 210. Pupil numbers for this period are shown in table 1 below.

Table 1

<i>Cymer Afan Comp.</i>												
	January annual census											October
Year	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2017
Pupil numbers	353	343	351	326	302	288	266	244	216	210	213	226

21. Forecasts based on January annual census returns suggest a potential increase of 54 pupils by 2021 (table 2). However, Cymer Afan Comprehensive will still be a small secondary school with numbers returning only to 2013 equivalent levels. Pupil numbers are projected to fall slightly in 2022/23.

Table 2

Cymer Afan Comp.							
	Annual census January	January forecasts					
Year	2017	2018	2019	2020	2021	2022	2023
Pupil numbers	213	221	220	241	267	259	260

22. With the physical capacity to accommodate 641 pupils (table 3) the school has a significant surplus capacity of 65% (415 places). Even at the forecasted high in 2021 there will still be 58% surplus capacity at the school, leaving the school notionally over half empty. This level of surplus capacity has revenue and capital costs associated with maintaining the school.

Table 3

Cymer Afan Comp.				
		Jan 2017		Jan 2023
	School capacity	October 2017 Pupil Nos.	Surplus places	Projected Pupil Numbers
Pupil numbers	641	226	415	260

– **Funding: school budget share**

23. Revenue costs associated with maintaining a small secondary school are significantly higher than for those schools with greater pupil numbers. This is reflected in the high ‘per pupil’ funding at Cymer Afan Comprehensive school which is significantly higher than the average for the Council’s schools (table 4). This cost has increased annually and since 2015/16 ‘per pupil’ funding at Cymer Afan Comprehensive School has exceeded the average for the Council’s schools by nearly 60%.

Table 4

	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Cymer Afan Comp.	£5,613	£6,054	£6,325	£6,344	£6,861	£7,156	£7,156	£7,111
Local Authority Average	£4,179	£4,240	£4,384	£4,441	£4,438	£4,480	£4,476	£4,476

– ***Federation in the upper Afan Valley***

24. The five school federation in the upper Afan Valley comprises four primary schools and one secondary school, i.e. Cymer Afan Comprehensive.
25. Pupil numbers attending the local schools had been falling, putting pressure on the schools to deliver teaching and learning in the context of reduced budget allocations. As such, the governors of the upper Afan Valley schools, supported by officers of the Council, moved to a federated arrangement as, at that time, it offered the best way forward for supporting the pupils and the schools.
26. Federation is the process whereby a group of schools decide to work in formal partnership under a single governing body. Schools within a federation maintain their own delegated budgets and identity but are able to explore the advantages of sharing resources such as facilities, IT, staff, school buildings, etc.
27. Removal of a school from the federation will, undoubtedly, change the current federated structure and operational arrangements but should not diminish the benefits that can be realised from a formal collaborative working arrangement.

Information about Ysgol Newydd Margam (*the proposed receiving school*)

28. The new, 21st century build, 3-16, 'all-through' middle school will provide for 1200 secondary age pupils. (It will also provide for 210 full-time primary age pupils, 45 nursery age pupils specifically from the catchment area currently served by Groes Primary school.)
29. A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range.
30. With a new school comes more choices and improved opportunities because of better facilities. Estyn³, report that the attainment and achievement of pupils improves significantly when they move into

³Estyn 2007: 'An evaluation of performance of schools before and after moving into new buildings or significantly refurbished premises'

new or significantly refurbished buildings, particularly when schools are in areas with high levels of social and economic deprivation.

31. Ysgol Newydd Margam will provide adaptable ICT facilities suitable for learning in the 21st century. Mobile technology will be integrated with a sound pedagogical base to provide pupils with enhanced learning experiences, equipping them with the key skills and motivation needed to raise standards.
32. The new build school will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction. The 2015 report, 'Clever Classrooms', found that well designed schools can significantly boost children's academic performance in reading, writing and maths. The school will allow for the delivery of a pupil centred, inclusive and skills based curriculum that extends to social and sporting activities. It will aim to promote equality and inclusion by providing facilities, sporting and cultural.
33. Following the first year of operation, an evaluation of the transfer to a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Table 5

<i>Secondary age pupil forecasts</i>							
	Annual census January	January forecasts					
Year	2017	2018	2019	2020	2021	2022	2023
Ysgol Newydd Margam	N/A	787	826	848	843	847	855
Cymer Afan Comp.	213	221	220	241	267	259	260
Total:	N/A	N/A	1046	1089	1110	1106	1115

34. Ysgol Newydd Margam has been built to accommodate 1200 secondary age pupils. In September 2018, when the school opens it is anticipated that 787 pupils will transfer from Dyffryn School. Assuming all pupils from Cymer Afan Comprehensive school transfer to Ysgol Newydd Margam in September 2019 the total number of secondary age pupils on roll is forecast to be 1046

increasing to 1115 in 2023. As such there is sufficient accommodation for the total combined forecasted pupil numbers (table 5 above).

Quality of Teaching and Learning

– Outcomes

35. Cymer Afan has 38% of pupils entitled to free school meals and 45% with identified additional learning needs. This places the school in benchmarking group 5. The school was inspected in April 2015 and both the current performance and the prospects for improvement were judged to be adequate. Estyn monitored the school and in November 2016 the school was judged to have made good progress in respect of the key issues for action.
36. Estyn (2015) report that standards are 'adequate' and note that 'When compared with their attainment in previous key stages, pupils make sound progress'.
37. In 2016/2017 the school was judged to be in the yellow support category of the National Categorisation system, which indicates it is an effective school with many aspects of performance which are self-improving.
38. Estyn report that wellbeing is 'good' at Cymer Afan Comprehensive School and that pupils are generally polite and well behaved. Estyn also report that 'many pupils enjoy their lessons and most have positive attitudes to learning'.
39. In 2015/2016 attendance improved to 92.3% from 91.5%, resulting in the school performing in the top 50% when compared to similar schools.
40. In the first year of operation the secondary pupil cohort at Ysgol Newydd Margam will comprise pupils who would otherwise have attended Dyffryn School. In this regard, whereas Ysgol Newydd Margam has yet to open, the current performance at Dyffryn School serves as a helpful comparator, as the new school would wish to build on the strengths of existing provision.
41. Dyffryn School has 20% of pupils entitled to free school meals and 24% with identified additional learning needs. The school is placed

in benchmarking group 3. The school was inspected in April 2014 and both the current performance and the prospects for improvement were judged to be good. The school's performance at key stage 4 in the indicators that include English and Mathematics place the school consistently in the top 50% of similar schools, with a drop to quartile 3 in 2015.

42. Dyffryn School is currently in the yellow support category (2016/2017). Estyn report that pupil wellbeing is good and that pupils treat each other with respect, listen to each other's views and co-operate very well when working together. They enjoy coming to school, and behave very well in lessons and around the school. Attendance data indicates the school is consistently above similar schools and is currently almost 94% (2016-2017 data).
43. Estyn⁴ also state that 'large primary and secondary schools tend to perform better than small and medium size schools'. 71% of secondary schools with less than 600 pupils require follow up activity after an Estyn inspection, compared to 46% of schools with more than 1,100 pupils. 21% of the smaller schools will be placed in a statutory category (significant improvement or special measures) while just 4% of larger schools will require the same level of support. In the same report, Estyn also state that the performance of pupils in key stage 3 and key stage 4 is generally better in large secondary schools, and note that large secondary schools can provide more appropriate levels of challenge and support.

– ***End of Key Stage 3 Data***

44. Performance indicators for Key Stage 3 place Cymer Afan Comprehensive School consistently in 3rd or 4th quartile for core subjects at level 5+ and at level 6+. In 2016 57% of pupils attained the expected level 5 or above in the core subjects of English, Maths and Science compared to 71% of pupils in similar schools, 78% in Neath Port Talbot and 86% across Wales.
45. In 2015 and 2016 Dyffryn School Key Stage 3 data also places the school in quartile 3 and 4 for core subjects at level 5+ and at level 6+. Pupils are performing above the local authority average and just below similar schools and schools across Wales in all core subjects.

⁴ Estyn 2013: 'School Size and Education Effectiveness'

– **Key Stage 4**

46. Results at Key Stage 4 at Cymer Afan Comprehensive School have shown a steady improvement over three years in all key indicators with a significant rise in 2016.

Table 8

Cymer Afan	2014	2015	2016
Level 2 Inc. E/W & M	31	33	59
Level 2	85	93	96
Level 1	97	98	100
CSI	31	33	49

47. Results for level 2 (5A*-C grades) show the school is performing better than similar schools, schools in Neath Port Talbot and schools across Wales as a whole, and since 2014 the school has been placed consistently in quartile1. In 2016 59% of pupil attained 5 A* - C GCSEs including English and maths, a 26% increase from 2015.

Table 9

	Cymer Afan	Family	LA	Wales
Level 2 Inc. E/W & M	59	42	61	60
Level 2	96	78	89	84
Level 1	100	91	95	95
CSI	49	36	57	58

48. At Dyffryn School results for level 2 also indicate that the school is consistently in quartile 1 when compared to similar schools, and also performs well against schools in Neath Port Talbot and across Wales.

Table 10

Dyffryn	2014	2015	2016
Level 2 Inc. E/M	51	48	75
Level 2	98	94	96
Level 1	99	97	100
CSI	51	47	73

49. 75% of pupils attained 5 GCSEs at A*-C grades including English and maths in 2016, an increase of 27%. The school is performing well in every key indicator when compared to the family of similar schools, other schools across Neath Port Talbot and schools across the whole of Wales.

Table 11

	Dyffryn	Family	LA	Wales
Level 2 Inc. E/W & M	75	62	61	60
Level 2	96	86	89	84
Level 1	100	98	95	95
CSI	73	59	57	58

– **Provision**

50. Estyn report that 'Cymer Afan Comprehensive 'has a warm, happy and friendly ethos that respects the United Nations' *Rights of the Child*,' and learning experiences are judged to be good. The school supports pupils well and works with a wide range of agencies to promote health and wellbeing. This has a positive impact on improving pupils' behaviour, engagement and attitudes to learning
51. At Dyffryn School Estyn report that learning experiences are good with an extensive range of extra-curricular activities, which include sport and music. Teaching is also judged to be good and pupils demonstrate motivation and engagement in learning. Pupils benefit from strong care, support and guidance and safeguarding arrangements are good.
52. Estyn report in 'School Size and Education Effectiveness' (December 2013) that 'curriculum provision tends to be broader and more balanced in large secondary schools'. Cymer Afan Comprehensive is a small secondary school with 226 pupils on roll. Delivering the range and breadth of the curriculum can be more challenging in a small school, placing increased burdens on a small number of staff.
53. Dyffryn School has been subject to school reorganisation and will become part of the new 3-16 school in Margam from September 2018. The school will occupy new build premises providing the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st Century facilities that will aim to improve the learning outcomes for all children across the ability range. With a new school comes more choices and improved opportunities because there is more space and better facilities.
54. Cymer Afan Comprehensive School is dependent on the support of 14-19 partnerships and works well with other providers to ensure that pupils have the opportunity to study a broad mixture of

academic and vocational courses. In larger schools there is more autonomy and less dependency on partnership and a wider range of options can be made available due to economies of scale.

55. Dyffryn School was judged by Estyn to have excellent partnership working, and 'has established highly effective partnerships that have had a significant impact on sustaining high standards of pupil attainment and wellbeing'.
56. Estyn report that in larger schools teaching is good or better in 63% of lessons, while just under 50% of teaching is good or better in smaller schools. Sharing good practice across departments is easier in a larger school with more staff, and gives teachers opportunities to better develop curriculum planning and delivery through closer working with colleagues.

– ***Leadership and Management***

57. Estyn report in 2015 that leadership and management at Cymer Afan Comprehensive was adequate. They noted that 'The warm, and caring ethos developed by leaders has resulted in improvements in pupils' behaviour, engagement and attitudes to learning'. However, they also report that leadership has not had enough impact in ensuring good progress in indicators that include English and Maths.
58. The school has experienced some instability in recent years with a number of changes in key leadership roles. Recruitment of a permanent Headteacher has proved difficult and currently the school has an acting Headteacher seconded from another secondary school in Neath Port Talbot. The post has recently been advertised nationally on a number of occasions but the school has failed to appoint a permanent head teacher.
59. Leadership and management at Dyffryn School are judged to be good and the school has been successful in sustaining high outcomes for pupils.

– **Quality of accommodation**

60. Cymer Afan Comprehensive School site has received some investment over recent years, including replacement of the main boiler and controls.
61. The site is categorised as overall condition C, i.e. poor, elements are exhibiting major defects and/or not operating as intended. Many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years. Backlog maintenance and accessibility costs amount to c.£3m.
62. Ysgol Newydd Margam is a c.£30m investment in a new build 21st century school which will be an exciting place for pupils and staff both internally and externally. It will have spacious, light and airy classrooms, with access to a range of high quality and appropriate spaces for social interaction.
63. New build facilities offer improved teaching and learning opportunities and can have significant impact on the attainment and achievement of pupils.

Options that have been considered

64. The Council has the responsibility for ensuring that it is making the very best use of resources and facilities in order to deliver high quality educational experiences and opportunities for children and young people.

Option 1 – Status quo: maintain the existing five school federation in the upper Afan Valley.

65. The high cost of maintaining a small secondary school is not efficient use of Council resources.
66. The benefits of a new, 21st century school environment will not be realised by maintaining the status quo, and so opportunities for improved teaching and learning experiences would be lost.
67. Implementing the proposal to close Cymer Afan Comprehensive School would effectively remove backlog maintenance and accessibility costs of c.£3m. Maintaining the secondary school at

the existing site would require significant investment and is not considered to be the best use of resources.

68. Cymer Afan Comprehensive School is operating with 65% surplus places; this is not sustainable in the long term. For a secondary school of less than 300 pupils it is unlikely that a business case could be developed to secure grant funding for a new 21st century school build or a replacement facility.
69. For the purpose of consultation, this is not the preferred option of officers.

Option 2 – Federate with another secondary school

70. In a federation schools are managed by a single governing body which takes decisions about matters such as staffing structures and expenditure. Under single leadership and governance there are potential teaching and learning benefits, staff development opportunities and efficiencies that can arise from a federated arrangement. A single governing body will be able to pool resources, maximise staff expertise and share facilities. A federation also presents the opportunity to co-ordinate curriculum provision and employ whole school teaching/learning strategies that will improve school performance and enhance educational experiences.
71. Although a federated arrangement with another secondary school would retain secondary education in the upper Afan Valley and avoid an increase in annual transport costs, it does not address the high costs of maintaining a small secondary school. Neither will it deal with the significant surplus places at Cymer Afan Comprehensive school and ongoing cost of building maintenance and repair. Importantly, it does not enable the pupils of the upper Afan Valley to benefit from education in a 21st Century school environment.
72. For the purpose of consultation, this is not the preferred option of officers.

Option 3 – Build a new ‘all-through’ middle school to replace the existing secondary and four primary schools.

73. The benefits of a 21st century school teaching and learning environment would be realised and significant backlog maintenance and repair liabilities would be removed together with significant surplus places. However, delivering secondary phase education would still be a challenge given the small number of secondary age pupils.
74. For the purpose of consultation, this is not the preferred option of officers.

Option 4 – Make arrangements for the pupils to receive their secondary education at Ysgol Newydd Margam and close Cymer Afan Comprehensive School.

75. A new build school provides the opportunity to deliver a stimulating teaching and learning environment in state of the art, 21st century facilities that will impact positively on the self-esteem and well-being of pupils and will aim to improve the learning outcomes for all children across the ability range. With a new school come more choices and improved opportunities because of better facilities.
76. An evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.
77. Cymer Afan Comprehensive School has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, i.e. poor, elements are exhibiting major defects and/or not operating as intended. This option would remove these financial liabilities. There are school budget share revenue savings to be made from educating the pupils of the upper Afan Valley at Ysgol Newydd Margam, savings that will be reinvested into the education budget.
78. Delivering the range and breadth of the curriculum can be more challenging in a small school, placing increased burdens on a small number of staff. A larger school is better placed to offer a wider range of options due to economies of scale and, in general, curriculum provision is broader and more balanced.
79. Ysgol Newydd Margam is within reasonable travel distance for pupils living in the upper Afan Valley.

80. For the purpose of consultation, this is the preferred option of officers.

Option 5 – Make arrangements for the pupils to receive their secondary education at a secondary school other than Ysgol Newydd Margam and close Cymer Afan Comprehensive School.

81. There are two other secondary schools that are near to the upper Afan Valley. They are Cefn Saeson Comprehensive School, Cimla, Neath and Maesteg Comprehensive School, Maesteg.
82. Cefn Saeson Comprehensive School has surplus capacity. However, at present it cannot offer the 21st century new build facilities that will be available at Ysgol Newydd Margam. Cefn Saeson Comprehensive School is some 9 miles for the furthest communities of the upper Afan Valley.
83. Maesteg Comprehensive is a school under the control of Bridgend County Borough Council. As such, its admission arrangements are outside the control of Neath Port Talbot. Security of admission for pupils from the upper Afan Valley could not be guaranteed at this juncture. A formal agreement with the neighbouring Authority would need to be put in place. Bridgend County Borough Council would be a consultee in the consultation process. Information indicates that nearly 50 pupils from Neath Port Talbot attend Maesteg Comprehensive school, nearly 30 of which are in year 7 and year 8. Maesteg Comprehensive School is the nearest secondary school to the upper Afan Valley, some 7 miles for the furthest community.
84. For the purpose of consultation, this is not the preferred option of officers.

Impact on pupils and parents

85. Transfer to Ysgol Newydd Margam will provide greater opportunities for pupils to access a wider range of specialist staff and facilities and increase opportunities for learning.
86. The pupils directly affected by this proposal will be current year 7, year 8 and year 9 at Cymer Afan Comprehensive School and future transfers from the primary sector schools. A new intake in 2019 will also impact on the pupils at Ysgol Newydd Margam.

87. Transfer to Ysgol Newydd Margam will involve a daily travel journey of approx. 13 miles from the furthest communities.
88. Whereas this proposal for consultation is based on making provision for pupils from the upper Afan Valley to receive their education at Ysgol Newydd Margam, in respect of a school they wish their child to attend parents are entitled to express a preference for admission at an alternative school, which will be granted subject to the availability of places. For community schools in Neath Port Talbot, the Council's admission policy will apply.

Impact on travel arrangements

89. Support with home to school travel will be made available in line with the Council's Home to School Transport policy. Secondary age pupils living 3 miles or more from their nearest suitable school are entitled to assistance with travel. As the designated receiving school, the Council will consider Ysgol Newydd Margam to qualify as a nearest suitable school.
90. The distance between the upper Afan Valley and Ysgol Newydd Margam is more than 3 miles, therefore assistance with travel will be provided to eligible pupils. Support with home to school travel will be made available in line with the Council's Home to School Transport policy. The Council is also obliged to provide transport to the nearest suitable school including schools in another Authority's area.
91. Annual cost of home to school transport is estimated to be in the region of c.£130k. Ysgol Newydd Margam has been designed to accommodate school transport generated by an increased pupil intake.

Impact on governors

92. The five schools in the upper Afan Valley are managed by a federated governing body. The federation should continue following the closure of Cymer Afan Comprehensive School, albeit with a revised structure and purpose.
93. Cymer Afan Comprehensive School will continue to exist and be managed by the federated governing body until its closure.

Impact on special needs education provision

94. There is no specialist unit for pupils with statements of special educational needs at Cymer Afan Comprehensive School. Pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose. The same arrangements will apply at Ysgol Newydd Margam.

Financial impact

95. The cost of the £30m new build investment at Ysgol Newydd Margam is not dependent on this proposal.
96. Revenue funding for schools is distributed on an annual basis by means of an approved formula. This ensures school budget shares are allocated on a simple, objective and measurable basis, and that recurring revenue costs are both predictable and clearly expressed. The funding formulas for the primary and secondary sectors were last revised in 2011. Consultation is currently underway on a proposed revision to the primary sector formula.
97. Ysgol Newydd Margam will be funded according to the Council agreed formula for allocating school budget shares which will reflect the number of pupils on roll including additional pupils as a result of this proposal.
98. Revenue savings for reinvestment into the education budget will be as a result of efficiencies in terms of cost of delivery through economies of scale; Ysgol Newydd Margam will be a large school. In this regard, the proposal supports the Council's effective management of its education budget and promotes the more equitable distribution of funding across local secondary sector schools.
99. However, there will be an additional recurring revenue cost as a result of the additional transport required, estimated at c.£130k annually.
100. Prior to consultation, officers will be assessing the potential cost of redundancy associated with this proposal.

101. As part of the consultation process consideration will be given to alternative use of the vacated site, including its resale and/or its demolition; estimated values and costs of which have yet to be calculated.

Equality impact assessment

102. An Equality Impact Assessment (EIA) will be required to fully progress this proposal. This will be completed prior to consultation. Some information required to undertake a full EIA will need to be obtained direct from the school. A full EIA will inform the consultation document and the subsequent consultation report presented to Members' for consideration.

103. Both Cymer Afan Comprehensive school and Ysgol Newydd Margam (when open) are inclusive for pupils of all ethnic groups and ethnicity is not a criterion under the Council's School Admissions Policy.

Workforce impacts

– *School staff*

104. There are 23.6 full-time teaching staff and 39 support staff with contracts attached to Cymer Afan Comprehensive school. Pupil teacher ratio is higher than the average for the Council's secondary sector schools (table 12) but this needs to be interpreted in the context of the arrangements across the federation.

105. Should a decision be taken to close school, staff with contracts attached to Cymer Afan Comprehensive school will be declared redundant. Employees identified at risk of redundancy will be supported by the Council's policies and HR staff.

106. Employment for some may continue within the federation whilst there is also the potential for employment opportunities at the receiving school because of increased numbers.

107. The governing bodies of schools in Neath Port Talbot have pledged to employ redundant staff where possible.

Table 12

	2017
School	9.0
Local Authority	16.6
Wales	16.5

– **Centrally employed staff**

108. Centrally employed staff will be managed via the Council's staff employment processes.

– **Staff support**

109. As part of the process all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that as a result of school reorganisation some staff take the opportunity to undertake new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a proven track record for supporting staff in such situations.

Legal impacts

110. The proposal requires the discontinuation of a school. The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement the proposal. The Welsh Government's School Organisation Code imposes on the Council requirements and guidelines on matters relating to school organisation, including consultation.

111. Pupil travel arrangements will be in line with the requirements of the Learner Travel (Wales) Measure 2008; the Learner Travel Statutory Provision and Operational Guidance 2014; and the Council's Home to School Travel Policy 2017.

112. Revenue funding will be in line with the requirements of the School Standards and Framework Act 1998; the School Funding (Wales) Regulations 2010; and the Council's approved formula for funding schools.

113. The management of staff affected by the proposal will follow the relevant school policy and procedure requirements.

114. The legislation referred to above is available using the electronic links in the section on background papers, below.

Risk management

115. A risk assessment has been carried out under the Council's Risk Management Policy 2015.

116. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.

117. Potential risk areas in implementing the proposal include:

- resistance to change leading to lack of pupil, parent and staff support
- educational standards not maintained
- loss of community facilities
- increased home to school travel time impacting on attendance and performance
- staff anxiety about job security
- negative impact on existing federation

118. Failing to implement the proposal will result in the following teaching/learning and financial benefits not being fully realised, particularly in relation to:

- providing a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils and staff
- access to a wider range of staff expertise
- opportunities for wider peer group interaction
- a more efficient and effective use of resources, and savings from economies of scale
- greater protection against the impact of a schools funding formula review
- reduction in the number of surplus pupil places

119. The benefits of implementing the proposal will mitigate the effects of identified risks. A new school provides greater prospects for improving educational attainment for pupils.

120. The full risk assessment is attached to this report as appendix A.

Community usage impact assessment

121. A Community Impact Assessment (CIA) will be required to fully progress this proposal which will be completed prior to consultation. Some information required to undertake a full CIA on community usage at the school will need to be obtained direct from the school.

122. Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

123. Co-locating services and making full use of school premises are strategies that can assist in driving down the cost of delivering a public service, such as education, as well as providing much needed service benefits for a local community.

124. However, the main purpose of a school is the delivery of high quality educational experiences for children and young people in order to raise standards. In this regard, school organisation proposals should be guided by a school improvement agenda and this should be applied to schools of whatever size, character or location.

125. A full CIA will inform the consultation document and the subsequent consultation report presented to Members' for consideration.

Welsh Language impact assessment

126. Officers are satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive School and that implementing the proposal should result in a positive impact on Welsh language development.

127. At Cymer Afan Comprehensive school the Welsh dimension is strongly supported. There are many valuable opportunities provided to develop pupils' knowledge and understanding of the history,

culture and industry of Wales. All pupils follow an appropriate course in Welsh in key stage 4, and a majority of pupils gain a qualification in Welsh at GCSE.

128. Whereas Ysgol Newydd Margam has yet to open, the experience at Dyffryn School serves as a helpful benchmark as the new school would wish to build on the strengths of existing provision. At Dyffryn School almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This was reported by Estyn to be strength of the school, who also noted that the school has been effective in promoting positive attitudes to the learning of Welsh.
129. The school is working towards improving pupils' Welsh language skills beyond formal Welsh lessons, and to encourage greater pupil self-confidence when using the language.
130. The full Welsh language assessment is attached to this report as appendix B.

Consultation period

131. 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, July 2013, which specifies the procedures to be followed, including the content of the consultation document and those to be consulted.
132. Subject to approval, it is intended to consult on this proposal between: Monday, 11th Dec. 2017 and Friday, 26th Jan.2018.
133. Responses to the consultation for consideration by Members will be reported to Education, Skills and Cabinet Board on Thursday 15th February 2018.
134. If, following consideration of the responses, Members decide to progress the proposal then a 28 day period will follow for the submission of objections.

Publication of consultation document	Mon. 11 th December 2017
Period for submitting responses	Mon. 11 th Dec. 2017 – Sun. 28 th Jan.2018
Consultation report published	Thurs. 15 th February 2018
Consideration of consultation responses by ESC Cab. Board	Thurs. 15 th February 2018
Proposed implementation date	September 2019

Recommendation

135. Having given due regard to the impact assessments accompanying this report, it is recommended that, in line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve:
- consultation on the future of secondary education in the upper Afan Valley to be brought forward under a proposal to make arrangements for pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at Ysgol Newydd Margam and to close Cymer Afan Comprehensive school; and as from 1st September 2019.

Reasons for proposed decision

136. This decision is necessary to comply with the formal consultation required of 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 secure efficient education in its area.

Implementation of the decision

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

Appendices

Appendix A: Risk assessment

Appendix B: Welsh language impact assessment

List of background papers

- a. Children, Young People and Education Cabinet Board – February 2013
[https://democracy.npt.gov.uk/Data/Children,%20Young%20People%20and%20Education%20Cabinet%20Board/20130207/Agenda/\\$CYPEB-0702013-REP-EL-AT.doc.pdf](https://democracy.npt.gov.uk/Data/Children,%20Young%20People%20and%20Education%20Cabinet%20Board/20130207/Agenda/$CYPEB-0702013-REP-EL-AT.doc.pdf)
- a) Strategic School Improvement Programme Principles Paper: September 2008
[https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/\\$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: July 2013
<http://gov.wales/docs/dcells/publications/130719-school-organisation-codes-en.pdf>
- c) School Standards & Organisation (Wales) Act 2013
http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf
- d) 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://gov.wales/docs/det/publications/140616-ltog-en.pdf>
- e) Home to School Travel Policy: 2017
https://www.npt.gov.uk/pdf/NPT_Home_to_School_Travel_Policy_2017.pdf
- f) Neath Port Talbot Council school admission policy
<https://www.npt.gov.uk/media/7870/nptcbc-community-school-admission-arrangements-2018-2019-determined.pdf>
- g) Federation process of maintained schools in Wales
<http://gov.wales/docs/dcells/publications/140522-guidance-on-federation-of-schools-en.pdf>
- h) School Standards & Framework Act 1998
<http://www.legislation.gov.uk/ukpga/1998/31/contents>
- i) School Funding (Wales) Regulations 2010
<http://www.legislation.gov.uk/wsi/2010/824/contents/made>
- j) Estyn
<https://www.estyn.gov.wales/inspection/search>

Officer Contact

Mr Andrew Thomas

Head of Transformation

tel 01639 763314

e-mail a.d.thomas@npt.gov.uk

Legal Implications

Education Act 1996: General Duties

1. Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.
2. Section 13A(3) of the 1996 Act states that a local authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.
3. Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council’s area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of (a) the pupils’ different ages, abilities and aptitudes; and (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.

School Standards and Organisation (Wales) Act 2013

4. Part 3 of the School Standards and Organisation (Wales) Act 2013 (“the 2013 Act”) is concerned with school organisation. The Welsh Ministers have issued the School Organisation Code (“the Code”)¹. Local authorities must, when exercising functions under Part 3 of the 2013 Act, act in accordance with any relevant requirements contained in the Code, and must have regard to any relevant guidelines contained in it. The key provisions are summarised in the section on the Code below.
5. Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals. A maintained school in Wales can only be discontinued in accordance with Part 3 of the 2013 Act.
6. A local authority has the power to make proposals to discontinue various types of schools, including a community school. Section 48(2) of the 2013 Act provides that before publishing such proposals, a proposer (in this case, the Council) must consult on its proposals in accordance with the Code. The consultation document must be issued during the term time of the schools affected and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.
7. The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn’s view (as provided in its consultation response) of the overall merits of the proposal.

¹ Welsh Government - School Organisation Code: July 2013
<http://gov.wales/docs/dcells/publications/130719-school-organisation-codes-en.pdf>

8. If a local authority decides to proceed with a proposal to discontinue a maintained school, it must publish proposals to that effect in accordance with the Code (section 48). The proposal must be published by way of statutory notice. Chapter 4 of the Code sets out specific requirements as to how statutory proposals must be published. Proposals must be published on a school day and the objection period must include 15 school days (in addition to the day on which it is published).
9. Section 49 of the 2013 Act makes provision for any person to object to proposals published under section 48 within the objection period of 28 days. The Council must then publish a summary of all objections made to the proposal and its response to those objections before the end of 7 days beginning with the day of the Council's determination.
10. The local authority proposer must then determine whether the proposals should be implemented. Where a local authority's proposals have received objections, and require determination, those objections will be carefully considered before a final determination is made. A further report to Cabinet will be prepared before any such determination is made. This determination must take place before the end of 16 weeks beginning with the end of the objection period.

The Code

11. The Code contains the following elements:
 - It imposes requirements in accordance with which relevant bodies (including all local authorities in Wales) must act. Where mandatory requirements are imposed by the Code or by the 2013 Act or another statute or statutory instrument, it is stated

that the relevant bodies must comply with the particular provision. Where practices are prohibited, it is stated that the relevant bodies must not use this practice.

- It includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.

12. Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:

- United Nations Convention on the Rights of the Child;
- A living language: a language for living – Welsh Language Strategy 2012-2017
- Welsh- medium Education Strategy;
- One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy;
- Child Poverty Strategy for Wales (issued February 2011 Information document number 95/2011), or any successor strategy;
- Faith in Education.

13. In addition, when developing school organisation proposals, the local plans to which Council should have regard include the following:

- Local plans for economic or housing development;

- Welsh in Education Strategic Plans (made under part 4 of the 2013 Act);
 - Children and Young People’s Plans (or successor plans)
 - 21st Century Schools – Capital Investment Programme and the relevant wave of investment.
14. Finally, the Council should have regard to the following Welsh Government Guidance on related matters:
- Learner Travel Operational Guidance²
 - Measuring the capacity of schools in Wales, Circular³.
15. Chapter 1 then lists a number of factors which should be taken into account by relevant bodies, including the Council, when exercising their functions of preparing and publishing school organisation proposals or approving/determining them. These factors include:
- Quality and standards in education (looking at outcomes, provision, leadership and management) at the school which is the subject of the proposals, and at any other school or educational institution which is likely to be affected. The Code states that local authorities should place the interests of learners above all others. Where proposals involve the transfer of learners to alternative provision, there should normally be evidence that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners.
 - The need for places and the impact on accessibility of Schools (whether alternative school based provision will have suitable

² Learner Travel Statutory Provision and Operational Guidance: 2014 - <http://gov.wales/docs/det/publications/140616-ltogg-en.pdf>

³ Measuring the capacity of schools in Wales, Circular - <https://gov.wales/docs/dcells/publications/111104measuringcapacityen.pdf>

capacity and provide accommodation of at least equivalent quality and is sufficient to meet existing demand and projected demand and the nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils. In particular, whether primary school pupils will have one way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour.

- Resources of education and other financial implications. This involves a consideration of a number of factors set out in the Code, including whether proposals ensure a fairer and more equitable distribution of funding between mainstream schools, what effect proposals will have on surplus provision, the costs of proposals (including additional transport costs), any projected net savings, any budget deficits of schools affected and whether the proceeds of sales of redundant sites remain in the education budget.

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

- considerations of alternatives to closure, including multi-site schools, clustering/collaboration/federation with other schools
- the overall effect of closure on the local community

- how parent's and pupil's encouragement with the alternative school and any facilities it may offer could be supported.
17. In addition to the usual considerations in relation to standards of provision, the Council should also consider
- whether proposals will improve standards of accommodation for pupils with SEN, including building accessibility;
 - how proposals will address any health, safety and welfare issues;
 - how proposals, where appropriate, will support increased inclusion; and
 - the impact of proposals on other SEN provision within the immediate and wider local authority area including out of county where appropriate.
 - whether there is a need for a particular type of SEN provision within the area;
 - whether there is surplus SEN provision within the area;
 - whether SEN provision would be more effective or efficient if regional provision were made; and
 - the impact of proposals on the transportation of learners with SEN.
18. The list of factors to be taken into account in approving/determining school organisation proposals is listed at paragraph 1.14.

Proposals must be determined in accordance with Chapter 5 of the Code

19. Paragraph 5.1 of the Code makes provision for the publication of objection reports. Proposers must publish a summary of the statutory objections and the proposer's response to those objections. Where a local authority is required to determine its

own proposals, the Objection Report must be published before the end of 7 days beginning with the day of its determination. The Objection Report must be published by being posted on the local authority's website. Hard copies must be made available on request. Parents, carers and guardians and staff members of schools which are the subject of the proposals must be advised of the availability of the Objection Report, together with parents of pupils attending primary schools from which pupils normally transfer to that secondary school. The Code contains a list of individuals or bodies which must receive either a hard copy of the Objection Report or be emailed a link to the local authority's website.

20. Paragraph 5.4 of the Code makes provision for determination of proposals by a local authority proposer. This determination must be made within 16 weeks of the end of the objection period. Where a local authority's proposals have received objections, and require determination, the local authority must not approach the determination of these proposals with a closed mind. Objections must be conscientiously considered alongside the arguments in respect of the proposals and in light of the factors set out in section 1.3 and 1.14 of the Code (as summarised above). In these cases, the Objection Report must be published at the same time as the decision is issued. The Council has published the Objection Report alongside the papers for the Cabinet meeting of 6th September 2018.
21. The Objection Report will be published on the Strategic School Improvement Programme webpage of the local authority's website by 13th September 2018. Hard copies will be available on request. Before the 13th September 2018, parents, carers and guardians and staff members of Cymer Afan Comprehensive school and the partner primary schools will be advised via the school of the link to

the local authority's website whilst other statutory consultees will be e-mailed the link.

Public Sector Equality Duty

22. The public sector equality duty (see section 149 of the Equality Act 2010) came in to force in April 2011. Public authorities like the Council are required, in carrying out their functions, to have due regard to the need to three equality needs set out under s149 of the Equality Act 2010 to:

- eliminate discrimination (both direct and indirect discrimination), harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

23. Direct discrimination occurs if, because of a protected characteristic, a local authority treats a person less favourably than it treats or would treat others.

24. Indirect discrimination occurs if a local authority applies to a person a provision, criterion or practice which is discriminatory in relation to a relevant protected characteristic of that person ("B"). A provision, criterion or practice is discriminatory if –

- The local authority applies, or would apply, it to persons with whom B does not share the characteristic,
- It puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it;

- It puts, or would put, B at that disadvantage, and
 - The local authority cannot show it to be a proportionate means of achieving a legitimate aim.
25. In short, indirect discrimination would arise if a local authority applies the same provision, criterion or practice to everyone, but it puts those in a certain protected group at a “particular disadvantage” when compared with persons who are not in that protected group. Even if a “particular disadvantage” arises, indirect discrimination does not arise if the provision, criterion or practice can be justified – i.e. if it is a proportionate means of achieving a legitimate aim. Members must pay due regard to any obvious risk of such discrimination arising in respect of the decision before them. These matters are examined in Appendix H and summarised in the Equality Impact Assessment section of the Cabinet report.
26. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life.
27. The steps involved in meeting the needs of disabled persons include steps to take account of the persons’ disabilities.
28. Having due regard to ‘fostering good relations’ involves having due regard to the need to tackle prejudice and promote understanding.
29. Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

30. The equality duty arises where the Council is deciding how to exercise its statutory powers and duties under the 1996 Act and the 2013 Act. The Council's duty under Section 149 of the Act is to have 'due regard' to the matters set out in relation to equalities when considering and making decisions in relation to its statutory duties under those Acts. Accordingly due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. Members must consider the effect that implementing a particular decision will have in relation to equality before making a decision. The council must have an adequate evidence base for its decision making. This can be achieved by means including engagement with the public and interest groups, and by gathering details and statistics on those who use Cymer Afan community school currently, and how the school is used. The potential equality impact of the proposals has been assessed, and that assessment is found at Appendix H of the Cabinet report. A careful consideration of this assessment is one of the key ways in which members can show "due regard" to the relevant matters.
31. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation). The steps proposed to be taken are set out in Appendix H.
32. Members should be aware that the duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its public functions (which includes the functions relating to school reorganisations). "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. There must be a proper

regard for the goals set out in s.149. At the same time, Members must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Improving the quality of education in the Council's area, making schools more efficient, budgetary pressures and practical factors will often be important, which are brought together in paras 83-104 of the report. The weight of these countervailing factors in the decision making process is a matter for members in the first instance.

33. The duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. However, section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).
34. The Council must also comply with the specific equality duties imposed by the Equality Act 2010 (Statutory Duties)(Wales) Regulations 2011, SI 2011/1064 ("the Regulations"), particularly regulation 8 (imposing specific duties to make arrangements for assessing the impact of its policies/practices and monitoring of the same).

Well-being of Future Generations (Wales) Act 2015

35. The Well-being of Future Generations Act 2015 ("the 2015 Act") requires the Council to think about the long-term impact of their decisions, to work better with people, communities and each other and to prevent persistent problems such as poverty, health inequalities and climate change.
36. To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council. The

2015 Act makes it clear the listed public bodies must work to achieve all of the goals, not just one or two, these being:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and Welsh Language
- A globally responsible Wales

37. The 2015 Act imposes a duty on all public bodies in Wales to carry out “sustainable development”, defined as being, "The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." The action that a public body takes in carrying out sustainable development includes setting and publishing well-being objectives, and taking all reasonable steps in exercising its functions to meet those objectives.

38. The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, these being:

- The importance of balancing short –term needs with the needs to safeguard the ability to also meet long-term needs
- Considering how the Council’s objectives impact upon each of the well-being goals listed above
- The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the Council services
- Acting in collaboration with other persons and organisations that could help the Council meet its well-being objectives
- Acting to prevent problems occurring or getting worse.

This page is intentionally left blank



This Statutory Notice is published by Neath Port Talbot County Borough Council, Civic Centre, Port Talbot. SA13 1PJ

NOTICE is given in accordance with Section 43 of the School Standards and Organisation Act (Wales) 2013 and the School Organisation Code that Neath Port Talbot County Borough Council having consulted such persons as required, propose to discontinue Cymer Afan Comprehensive School, School Road, Cymmer, Port Talbot SA13 3EL, an English-medium, community, secondary school currently maintained by Neath Port Talbot County Borough Council (“the Council”).

The Council undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees, the Council’s response to those issues, and the views of Estyn is available on the Council’s website at <https://www.npt.gov.uk/1891> (a hard copy is available on request).

It is proposed to implement the proposal on **1st September 2019**.

Education provision for pupils who would otherwise have attended Cymer Afan Comprehensive School will be available at Ysgol Cwm Brombil, Bertha Road, Margam, Port Talbot, SA13 2AN. Ysgol Cwm Brombil is an English-medium community school scheduled to open in September 2018. It will be maintained by the Council which will be the admission authority for the school. Ysgol Cwm Brombil will provide education for pupils aged 3-16 and has sufficient capacity to admit the pupils who would otherwise have attended Cymer Afan Comprehensive School. As the designated receiving school, Ysgol Cwm Brombil will qualify as a ‘nearest suitable’ school in relation to home to school travel. Transport arrangements will be in line with Neath Port Talbot County Borough Council’s Home to School Travel Policy.

Within a period of 28 days after the date of publication of this proposal, that is to say by the **23rd July 2018**, any person may object to the proposal.

Objections should be sent to the Director of Education, Leisure and Lifelong Learning, Education Department, 2nd Floor, Civic Centre, Port Talbot SA13 1PJ or e-mailed to ssip@npt.gov.uk

Signed:

Aled Evans, Director of Education, Leisure & Lifelong Learning

Dated: 26th June 2018

Explanatory Note

(This note does not form part of the Notice but is intended to explain its general meaning)

- (i) The Council is proposing to close Cymer Afan Comprehensive School and, as from 1st September 2019, to provide secondary education for pupils from the upper Afan Valley at Ysgol Cwm Brombil, Margam, subject to parental preference.
- (ii) Ysgol Cwm Brombil is a new build, English-medium school for pupils age 3 – 16 scheduled to open in September 2018.
- (iii) The rationale and the details of the proposal are set out in the consultation document and consultation report which are available on the Council's Strategic School Improvement Programme webpage: <https://www.npt.gov.uk/1891>
- (iv) Pupils on roll at Cymer Afan Comprehensive School prior to closure will, subject to parental preference, transfer to the Ysgol Cwm Brombil, Margam, for their secondary education.
- (v) Parents of prospective pupils will need to apply for a place for their child in line with the Council's School Admission Policy. The relevant School Admission Policy can be viewed on the Council's webpage: <https://www.npt.gov.uk/media/8993/nptcbc-community-school-admission-arrangements-2019-2020.pdf>
- (vi) Ysgol Cwm Brombil is designated as the receiving school and, as such, will qualify as a 'nearest suitable' school when assessing a pupil's home to school transport entitlement. Transport, free of charge, will be available to eligible pupils in line with the Council's Home to School Travel policy which can be viewed on the Council's webpage: https://www.npt.gov.uk/media/4231/npt_home_to_school_travel_policy_2017.pdf
- (vii) Anyone wishing to object to this proposal may do so between Tuesday, 26th June 2018 and Monday, 23rd July 2018 by stating, in writing, the reason for objecting and sending this to the Director of Education, Leisure and Lifelong Learning, Education Department, 2nd Floor, Civic Centre, Port Talbot SA13 1PJ or e-mailed to: ssip@npt.gov.uk
- (viii) Hard copies or alternative versions of all documentation may be obtained upon request from the Strategic School Improvement Team using the address above.

Equality Impact Assessment (EqIA) Report Form

Service Area: Strategic School Improvement Programme(SSIP)
Directorate: Education, Leisure and Lifelong Learning (ELLL)

(a) This EIA is being completed for a...

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal X
----------------------	----------------------	---------	----------	------	----------------------

(b) The Council is proposing to discontinue Cymer Afan Comprehensive school and make arrangements for pupils who would have attended there to receive their secondary education at Ysgol Cwm Brombil.

(c) This proposal has been screened for relevance to Equality and Diversity. This EqIA is the most current version, updated, 31/08/2018

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

Age	<input checked="" type="checkbox"/>	Race	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Religion or belief.....	<input type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	Sex	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Welsh language.....	<input type="checkbox"/>
Income deprivation.....	<input checked="" type="checkbox"/>		

(e) Lead Officer

Name: Richard Gordon

Job title: SSIP Programme Manager

Date: 31/08/2018

(f) Approved by Head of Service

Name: Andrew Thomas

Job title: Head of Transformation

Date: 31/08/2018

Section 1 – Aims (See guidance):

The Public Sector Equality Duty

This Equality Impact Assessment has been undertaken to identify impacts on stakeholders resulting from the closure of Cymer Afan Comprehensive school and the transfer of pupils to Ysgol Cwm Brombil. In particular, the assessment has been designed to discharge the Council's duties under section 149 of the Equality Act 2010 by ensuring that decision makers have due regard to the three equality needs set out in section 149(1) and to identify the impact on protected groups.

Aims

To close Cymer Afan Comprehensive School with effect from 1st September 2019 and make arrangements for the pupils who would normally attend the school to transfer to Ysgol Cwm Brombil, which is due to open on the 1st September 2018.

Ysgol Cwm Brombil is a new build school with 21st Century facilities, a £30m investment by the Council. Generally pupils' attainment and achievement improve in new build schools and improvement in the quality of buildings can have a positive impact on the quality of teaching and staff morale, which in turn further impacts on pupil performance.

The proposal comes under the School Standards and Organisation (Wales) Act 2013. Under this legislation, the process for change requires a full statutory consultation programme to receive comments on the proposal, followed by the publication of a statutory notice and a period of objections to be received before a determination is taken.

Neath Port Talbot County Borough Council (NPTCBC) Strategic School Improvement Programme (SSIP) involves reviewing the existing school provision across the County Borough and determining the number and type of schools needed to deliver education effectively and efficiently in the future.

Currently secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive School as part of a federation of five schools, four primary and one secondary. NPTCBC has reviewed this provision on the basis of:

- educational standards;
- the need for places and the accessibility of schools;
- the quality and suitability of school accommodation; and
- effective financial management.

Cymer Afan Comprehensive is a secondary school with 229 pupils as of January 2018. As it has fewer than 600 pupils, Cymer Afan Comprehensive School is classified as a 'small' secondary school. The school has capacity for 641 pupils, meaning it currently has 64% surplus capacity and pupil numbers are not forecasted to increase sufficiently to change its small secondary school status in the foreseeable future.

In the current financial year (2018/19), Cymer Afan Comprehensive School receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average.

Cymer Afan Comprehensive School has backlog maintenance and accessibility costs amounting to c.£3m. The site has been assessed and many of the building and mechanical elements are nearing the end of their life span.

Responsibility: Director of Education Leisure and Lifelong Learning, Head of Transformation and Strategic School Improvement Programme.

Stakeholders

The impact assessment considers the impacts on:

- staff employed at Cymer Afan Comprehensive School (including governors); and
- pupils that would have received their secondary education at Cymer Afan Comprehensive School from September 2019 onwards.

There are two distinct groups of pupils who may be impacted by the proposal. These are:

- pupils who will be attending Cymer Afan Comprehensive who will see disruption to their education; and
- future pupils from the partner primary schools who will have a different set of choices about where to attend secondary school.

The purpose of the impact assessment is to provide information for the decision-making process. It is designed to help policy makers appraise the likely impacts of the proposal on people with characteristics protected under the Equality Act 2010.

The purpose of the impact assessment is to inform rather than determine policy. The objective is not to make the decision, but to assist decision makers through the provision of relevant information. The impact assessment also identifies ways to minimise, mitigate or otherwise manage adverse impacts and identify and optimise beneficial impacts.

Complementing this Equality Impact Assessment, NPTCBC has also assessed the impact that the closure of Cymer Afan Comprehensive school may have on the local community through the loss/displacement of community facilities and provision¹.

Section 2 - Information

(a) Service Users

Age	<input checked="" type="checkbox"/>	Race	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Religion or belief.....	<input checked="" type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	Sex	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input checked="" type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input checked="" type="checkbox"/>	Welsh language.....	<input type="checkbox"/>
Income deprivation.....	<input checked="" type="checkbox"/>		

¹ Neath Port Talbot County Borough Community Impact Assessment (Dec '17) – Cymer Comprehensive School

Service User Information.

The closure of Cymer Afan Comprehensive School has the potential to impact upon a number of groups with protected characteristics. This proposal relates to the pupils and staff of a maintained secondary school within the NPTCBC area.

NPTCBC have collected information and data on the pupils and staff who may be impacted by the proposal to close Cymer Afan Comprehensive School. This data includes:

- Pupil Level Annual School Census (PLASC) data (January 2018)
- NPTCBC HR records
- School pupil records
- Staff records

Where appropriate (and available), detailed demographic data has been added. This has been provided for the study area (classified as the catchment area for Cymer Afan Comprehensive School), Neath Port Talbot area, and compared to the Wales national average. The sources of this data include:

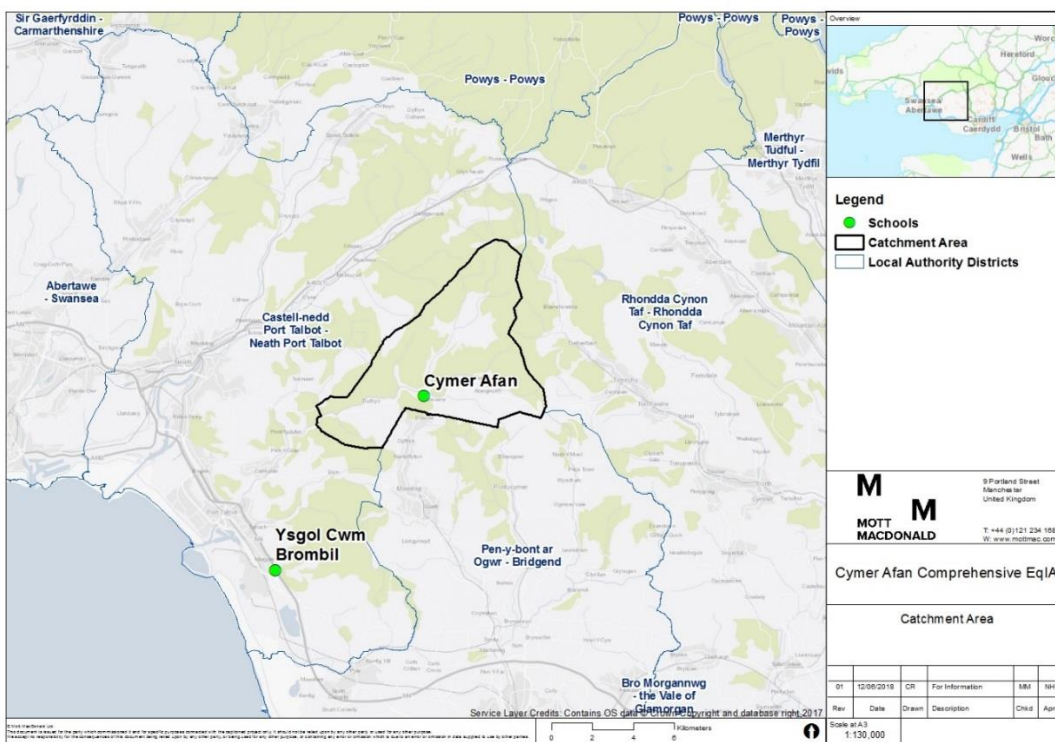
- Office for National Statistics (ONS) Annual Mid-Year Population Estimates (MYE) 2016
- ONS Census 2011

The spatial scope of the impact assessment is the catchment area for the Cymer Afan Comprehensive School, which includes the wards;

- Cymmer
- Gwynfi
- Glyncorrgw

The spatial scope is set out in figure 1 below.

Figure 1 Catchment area



Age

Pupils

Cymer Afan Comprehensive School provides for pupils aged 11-16 years.

Table 1: Pupil age profile

Year group	Likely age ranges	Pupil count	Percentage
7	11-12	51	22%
8	12-13	58	25%
9	13-14	40	17%
10	14-15	32	14%
11	15-16	48	21%

Source: Pupil records (annual school census) 2018

Pupils in the primary schools that serve the Afan Valley will be affected by this proposal. Of these there are 48 Year 6 pupils and 56 Year 5 pupils

Staff

Cymer Afan Comprehensive School employs some 64 members of staff. The age profile of the current staff is detailed below:²

Table 2: Staff age profile

Age	Staff count	Percentage*
18-24	6	9%
25-34	10	15%
35-44	16	25%
45-54	16	25%
55-64	16	25%
65+	1	2%

Source: Staff records 2017

*Aggregated to nearest whole

Community

The age profile of the study area in comparison to Neath Port Talbot and Wales averages is:

- in line for ages 5-16 years: 13% (for all three);
- slightly higher for ages 9-11 years: 4% (vs 3% for both); and
- in line for ages 11-14 years: 4% (for all three).

Table 3: Study area and comparator populations aged 5-16 years

	Population		
	All ages	Ages 5 to 16 years	% ages 5 to 16 years
Study Area	5,142	679	13%
Neath Port Talbot	141,678	18,608	13%
Wales	3,113,150	418,616	13%

Source: MYE 2016

² This has been calculated using year of birth against age upon 01/01/2019

Table 4: Study area and comparator populations aged 9-11 years

	Population		
	All ages	Ages 9 to 11 years	% ages 9 to 11 years
Study Area	5,142	184	4%
Neath Port Talbot	141,678	4,712	3%
Wales	3,113,150	104,770	3%

Source: MYE 2016

Table 5: Study area and comparator populations aged 11 to 14 years

	Population		
	All ages	Ages 11 to 14 years	% ages 11 to 14 years
Study Area	5,142	212	4%
Neath Port Talbot	141,678	5,938	4%
Wales	3,113,150	131,937	4%

Source: MYE 2016

Disability

The Equality Act 2010 defines a disabled person as a person with a disability. A person has a disability for the purposes of the Act if he or she has a physical or mental impairment and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities (S6(1)).

A disability can arise from a wide range of impairments which can include

- sensory impairments, such as those affecting sight or hearing;
- impairments with fluctuating or recurring effects such as rheumatoid arthritis, myalgic encephalitis (ME), chronic fatigue syndrome (CFS), fibromyalgia, depression and epilepsy;
- progressive, such as motor neurone disease, muscular dystrophy, and forms of dementia;
- auto-immune conditions such as systemic lupus erythematosus (SLE);
- organ specific, including respiratory conditions, such as asthma, and cardiovascular diseases, including thrombosis, stroke and heart disease;
- developmental, such as autistic spectrum disorders (ASD), dyslexia and dyspraxia;
- learning disabilities;
- mental health conditions with symptoms such as anxiety, low mood, panic attacks, phobias, or unshared perceptions; eating disorders; bipolar affective disorders; obsessive compulsive disorders; personality disorders; post-traumatic stress disorder, and some self-harming behaviour;
- mental illnesses, such as depression and schizophrenia;
- produced by injury to the body, including to the brain

Pupils of Cymer Afan Comprehensive school who may be experiencing any of the above impairments will be recorded on the school Special Educational Needs (SEN) register and as such the data available from that has been used to inform this assessment.

Information on adults who may be experiencing any of the above impairments has been gathered through the data available on limiting long term illness, or in the case of staff on records held by the school.

Pupils

The school is a mainstream school, providing education for pupils with additional learning needs/special educational needs (ALN/SEN). Currently the school provides for:

- 5 pupils who have statements of special educational needs;

- 32 pupils on School Action Plus; and
- 41 pupils on School Action.³

All of these pupils have their learning needs catered for by the school within the mainstream setting.

The percentage of pupils attending Cymer Afan Comprehensive school with ALN/SEN is 34% which is higher than the Neath Port Talbot average percentage of 26.1% and higher than the all Wales percentage of 22.5%.

Statemented pupils will have undergone a statutory process involving agencies from outside of the school including educational psychologists and health professionals, while School Action (SA) and School Action Plus (SAP) will be pupils identified by the school as having a specific educational need. The percentage of pupils with a statement at Cymer Afan Comprehensive is lower than the local authority and all Wales percentages at 2.2%, however the percentage of pupils identified by the school as having SEN/ALN is significantly higher than the other comparators.

Table 6: SEN Comparative Data

	Pupil No's	Statemented		School Action		SAP		All SEN	
		No.	%	No.	%	No.	%	No.	%
	(All Pupils)								
CAC	229	5	2.2%	41	17.9%	32	14.0%	78	34.1%
NPT	20929	862	4.1%	2929	14.0%	1547	7.4%	5338	25.5%
Wales	467112	12895	2.8%	57933	12.4%	34797	7.4%	105625	22.6%

Source: Pupil records (annual school census) 2018

Staff

Staff records show that there are no members of staff at Cymer Afan Comprehensive School who have declared that they have a disability.

Community

The proportion of people with a limiting long-term illness (LLTI) is higher in the school's catchment area than both the Neath Port Talbot and Wales averages: 35% compared to 28% and 22% respectively.

Figure 2 below shows that the highest densities of people living with an LLTI are largely clustered around Cymer Afan Comprehensive School (the area with the highest population density).

³ School Action are interventions for SEN pupils identified by teachers as requiring additional support and School Action Plus are interventions with advice/support from outside specialists; National Assembly for Wales (2004) Special Educational Needs Code of Practice for Wales

Figure 2 LLTI population density map

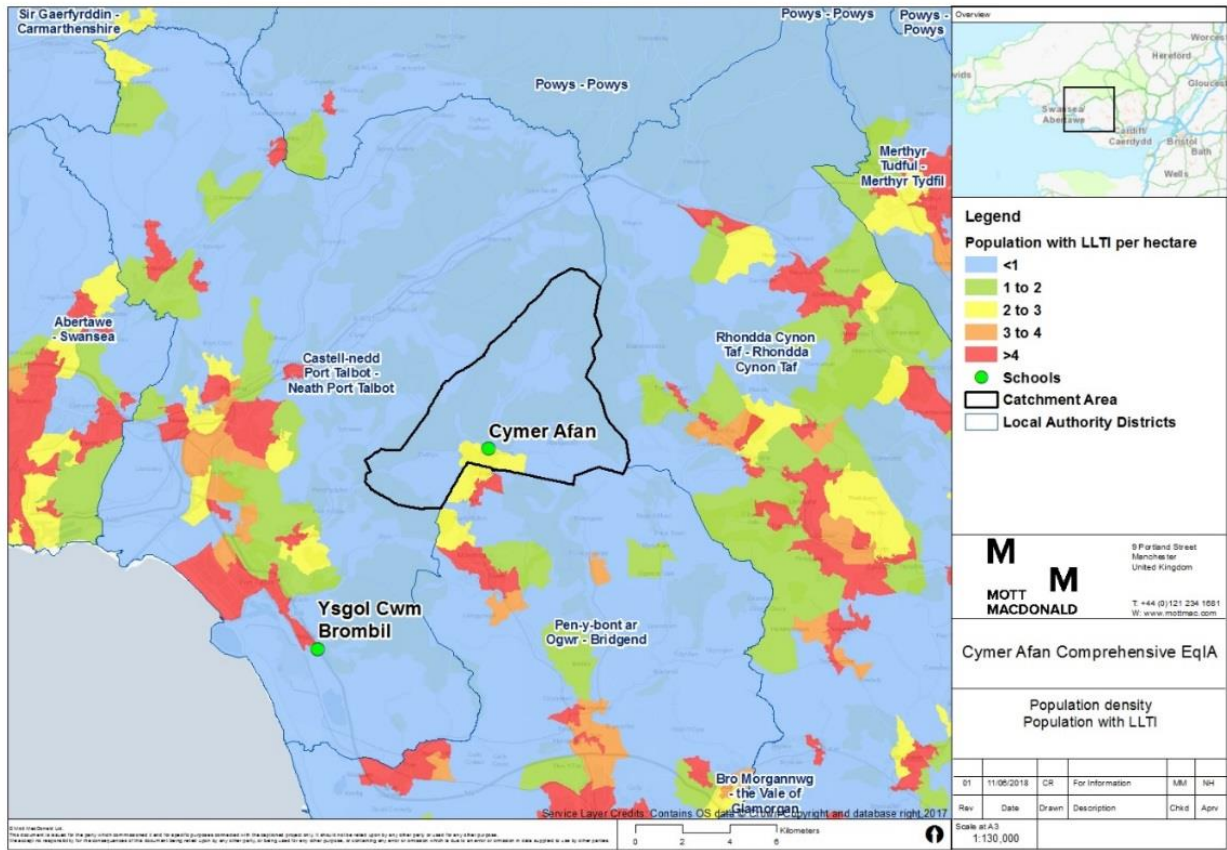


Table 7: Study area and comparator populations with LLTI

	Population		
	All ages	LLTI	% LLTI
Study Area	5,142	1,817	35%
Neath Port Talbot	141,678	39,112	28%
Wales	3,113,150	695,855	22%

Source: Census 2011/ MYE 2016

Table 8: Study area and comparator populations with LLTI aged 0-15 years

	Population		
	All ages	LLTI ages 0-15 years	% LLTI ages 0-15 years
Study Area	5,142	77	1.4%
Neath Port Talbot	141,678	1,234	0.8%
Wales	3,113,150	22,080	0.7%

Source: Census 2011/ MYE 2016

Race and ethnicity

Pupils

Pupil Level Annual School Census (PLASC) data shows that the school only has one BAME (black, Asian and minority ethnic) pupil, who has declared their ethnicity as ‘other Chinese’.

Staff

HR records show that staff at the school have declared their nationality as 16 British, 46

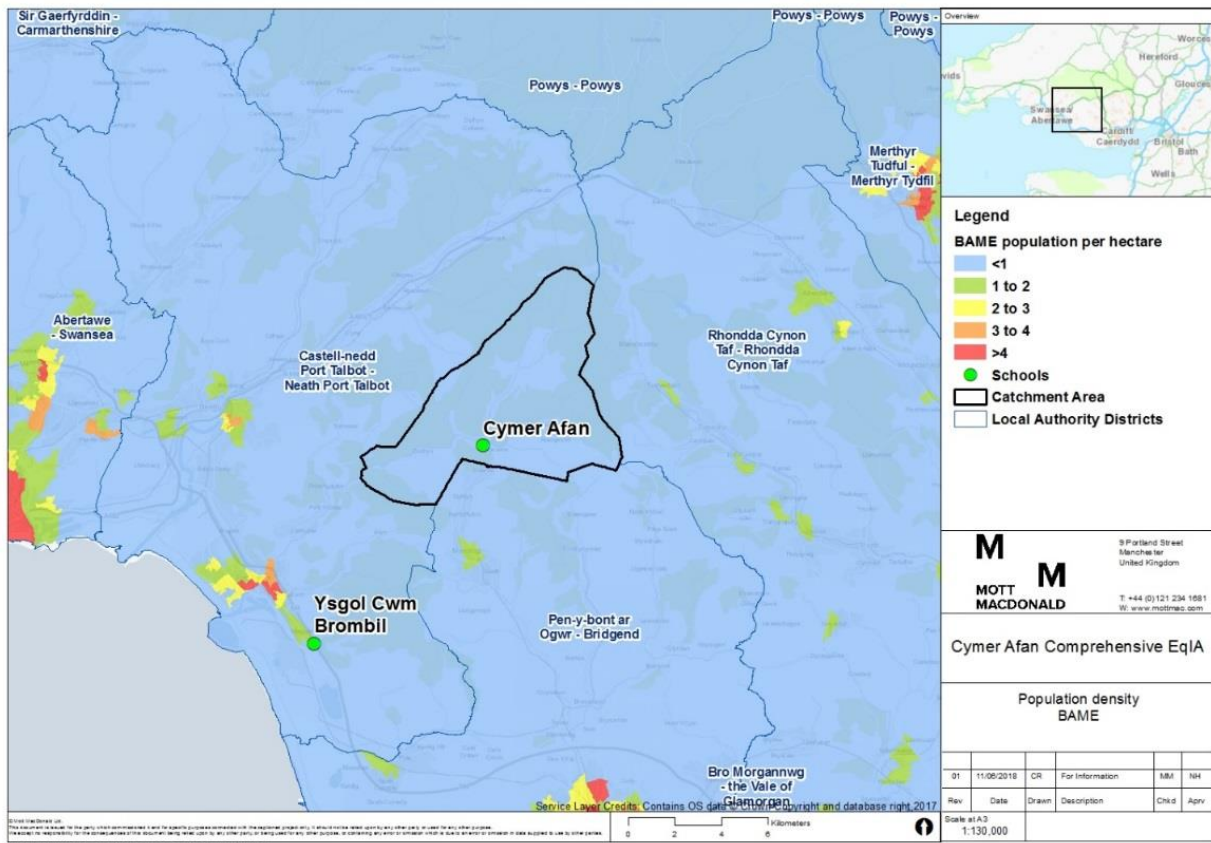
Welsh, and 2 prefer not to say.

HR records also indicate that 61 staff have declared their ethnic origin as white – British/English/Northern Irish/Scottish/Welsh, 1 as white –other and 2 prefer not to say.

Community

Figure 3 below demonstrates that the catchment area has a very low BAME population per hectare (less than one per hectare for all).

Figure 3 BAME populations density map



The study area has a low proportion of BAME children aged 0-15 years, slightly lower than the percentages for Neath Port Talbot and Wales.

Table 9: Study area and comparator BAME populations aged 0-15 years

	Population		
	All ages	BAME ages 0-15 years	% BAME ages 0-15 years
Study Area	5,142	22	0.4%
Neath Port Talbot	141,678	995	0.7%
Wales	3,113,150	47,710	1.5%

Source: Census 2011/ MYE 2016

Religion or belief

Pupils

Cymer Afan Comprehensive is a community school and religion or belief is not a criterion under NPTCBC’s admissions policy for community schools.

The religion and belief profile of the school is:

- 61 Christian
- 2 Church of Wales

All other pupils (approximately 166) left the religion option blank or declared no religion.

Staff

Staff data held on religion/belief is according to what individuals have chosen to disclose. No data is held for any of the staff.

Community

The religion and belief profile of the study area in comparison to Neath Port Talbot and Wales averages is lower.

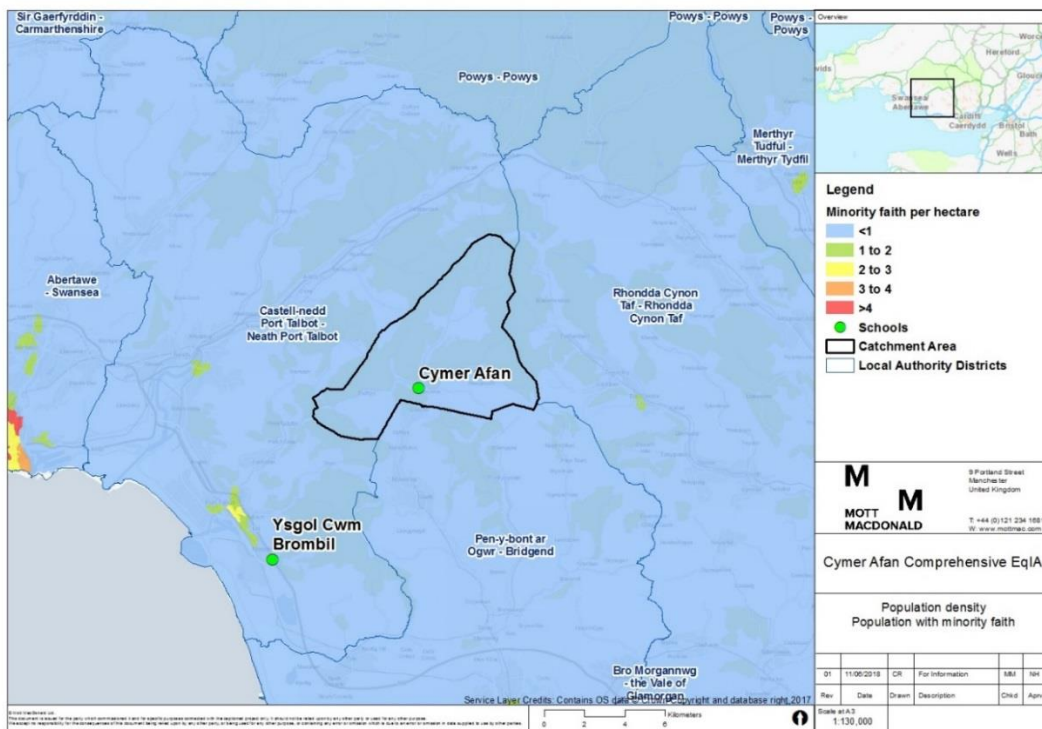
Table 10: Study area and comparator minority faith populations aged 0-15 years

	Population		
	All ages	Minority faith ages 0-15 years	% Minority faith ages 0-15 years
Study Area	5,142	16	0.3%
Neath Port Talbot	141,678	2,120	1.4%
Wales	3,113,150	109,380	3.5%

Source: Census 2011/ MYE 2016

Figure 4 below demonstrates that the catchment area had a very low minority faith population (minority faith groups include Muslim, Hindu, Sikh, Jewish, Buddhist and Other religion) per hectare (less than one percent across all minority faith groups)

Figure 4 Minority faith populations density map



Sex

Pupils

Cymer Afan Comprehensive School admits both boys and girls. The sex profile of the school is detailed below in table 11.

Table 11: Pupil sex profile

	Pupil count	Percentage
Female	118	52%
Male	111	48%

Source: Pupil records 2018

Staff

The school employs both male and female staff members. The sex profile of the current staff is detailed below.

Table 12: Staff sex profile

	Staff count	Percentage
Female	46	72%
Male	18	28%

Source: Staff records 2017

Community

Table 13 indicates that there is no significant difference between the study area and the other comparators.

Table 13: Study area and comparator sex profile aged 0-15 years

	Population					
	All ages		Sex profile ages 0-15 years		% Sex profile ages 0-15 years in relation to all ages	
	Female	Male	Female	Male	Female	Male
Study Area	2,579	2,563	516	465	20%	18%
Neath Port Talbot	72,078	69,600	12,136	12,637	17%	18%
Wales	1,579,112	1,534,038	271,410	285,669	17%	19%

Source: Census 2011/ MYE 2016

Table 13a :Pupil profile compared to study area and comparator

	% Sex profile – Children ages 0-15 years			
	% Sex profile ages 0-15 years		% Sex profile Cymer Afan Comp. Pupils	
	Female	Male	Female	Male
Study Area	53%	47%	52%	48%
Neath Port Talbot	49%	51%		
Wales	49%	51%		

The sex profile of pupils at Cymer Afan Comprehensive school reflects that of the study area and is not dissimilar to the profile of Neath Port Talbot or Wales.

Table 13B: Staff profile compared to study area and comparator

	% Sex profile – All ages			
	% Sex profile All ages		% Sex profile Cymer Afan Comp. Staff	
	Female	Male	Female	Male
Study Area	50%	50%	72%	28%
Neath Port Talbot	51%	49%		
Wales	51%	49%		

The sex profile of staff at Cymer Afan Comprehensive school shows a significantly higher percentage of females compared to males. This difference is not reflected in the sex profiles of the study area, Neath Port Talbot and Wales.

Pregnancy and maternity

Pupils and staff

At the time of this assessment, NPTCBC is not aware of any pupil being pregnant at the school.

No data is available for staff. NPTCBC has policies in place to cover those members of staff who are pregnant or on maternity leave/paternity leave.

Gender reassignment

Pupils and staff

Data on gender reassignment is held according to what individual pupils and staff have chosen to disclose. No data is held for any of the pupils or school staff on their gender status.

However an objection has been received which indicates that a future pupil of Cymer Afan Comprehensive School is undergoing counselling for possible future gender reassignment.

Marriage and civil partnership

Pupils

This protected characteristic is not applicable to pupils due to their age.

Staff

The current marriage and civil partnership profile of the current staff is detailed below.

Table 14: Staff marriage/civil partnership profile

	Staff count	Percentage*
Married	35	55%
Single	19	30%
Divorced	4	6%
Partnered	3	5%
Widowed	3	5%

Source: Staff records 2017

*aggregated to nearest whole

Sexual orientation

Pupils and staff

Data held is according to what individuals have chosen to disclose. Neither pupils nor staff

have chosen to declare their sexual orientation. As such, no data is available for any of the pupils or school staff.

Income deprivation

Pupils

Although income deprivation is not a protected characteristic as defined by the Equalities Act 2010, children from an economically deprived background can have a different experience of transferring schools.

Children may be entitled to receive free school meals if their parents/carers are in receipt of certain benefit/support payments, including Income Support and Universal Credit. The Institute of Fiscal Studies suggests the following advantages to using eligibility for free school meals as criteria to measure income deprivation:

- It defines income deprivation at the pupil level rather than LSOA level.
- It better reflects the relative income deprivation of the school and local area.⁴

Table 15: Study area and comparator free school meal eligibility

	%
Cymer Afan Comprehensive School	31%
Local Authority	22%
Wales	17%

Source: NPTCBC 2018 school census

Community

The study area is in an area of acute deprivation; 100% of the study area is either in the most or second most deprived quintile, this is in comparison to 59% of Neath Port Talbot and 39% of Wales.

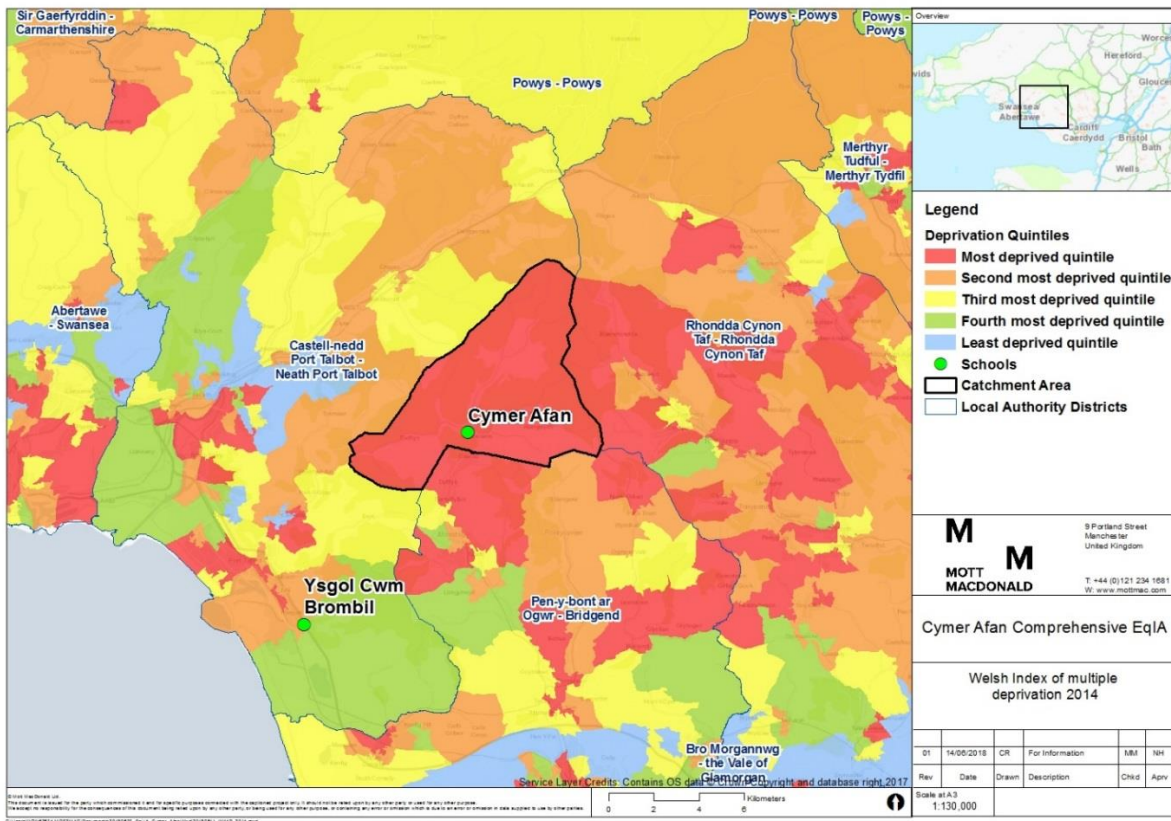
Table 16: Study area and comparator populations with deprivation

	Population	Population living in the most or second most deprived quintile	Population living in the most or second most deprived quintile%
Study Area	5,142	5,142	100%
Neath Port Talbot	141,678	84,065	59%
Wales	3,113,150	1,226,953	39%

Source: WIMD 2014

⁴ IFS (2013) A comparison of commonly used socio-economic indicators: their relationship to educational disadvantage and relevance to Teach First, available at: <https://www.ifs.org.uk/comms/r79.pdf>

Figure 5 Deprivation map



Actions Required

Data on protected characteristics will continue to be monitored and checked to ascertain what impact, if any, the proposal has on protected groups.

(b) General

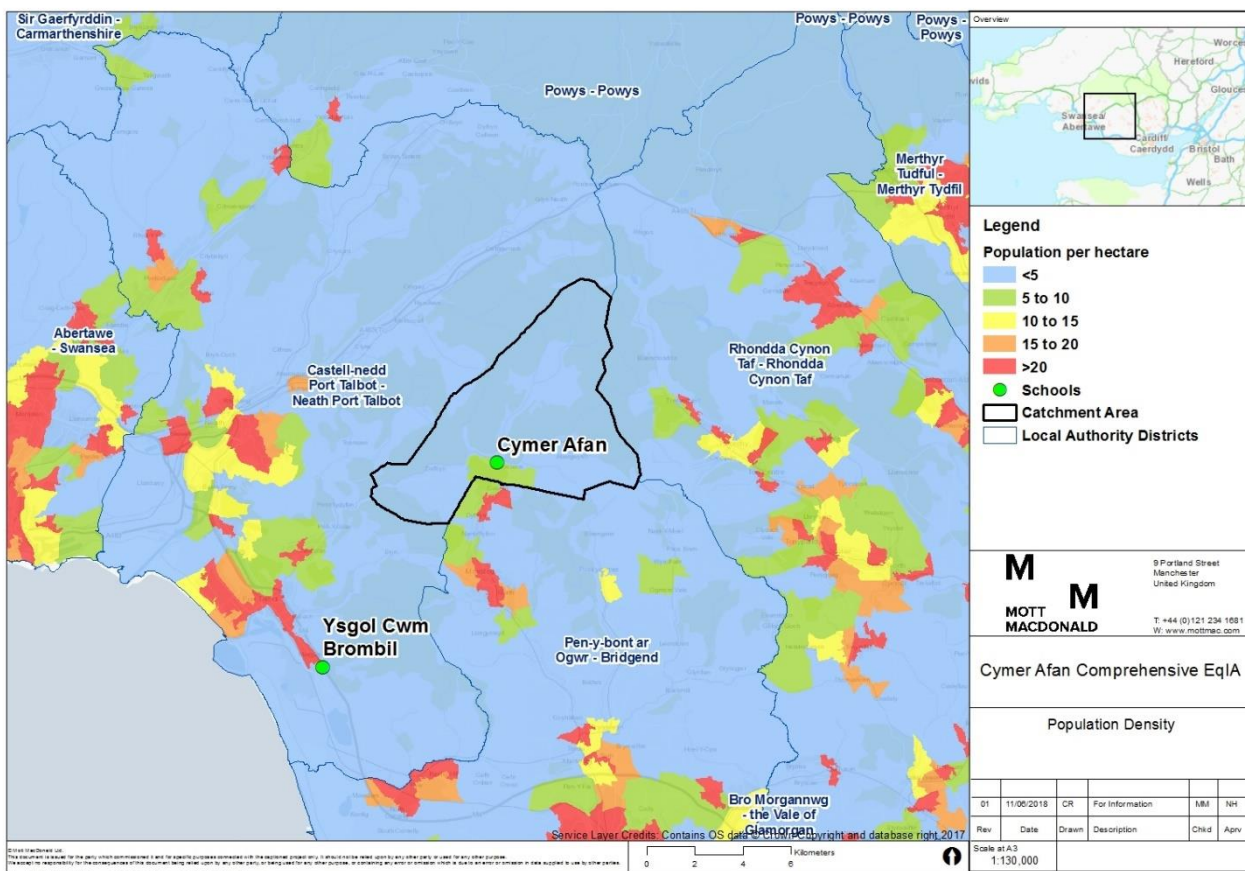
What information do you know and how is this information collected?

The spatial scope of the impact assessment is the catchment area for the Cymer Afan Comprehensive School which includes the wards:

- Cymmer
- Gwynfi
- Glynccorwg

The figure below illustrates the overall population density for the study area. It shows that the overall population density is low but that the highest densities of people live predominantly in the south of the area, around Cymer Afan Comprehensive School.

Figure 6 Population density map



Actions Required

Data on protected characteristics will continue to be monitored and checked to ascertain what impact, if any, the proposal has on protected groups.

Section 3 – Impact

(a) Impact on Protected Characteristics

	Positive	Negative	Neutral	Needs further investigation
Age	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	→ <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	→ <input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Welsh language	→ <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Income deprivation	→ <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Overall impact on staff

Overall there will be impacts on all staff who are made redundant following the closure of Cymer Afan Comprehensive School.⁵

These impacts include:

- **Financial** (immediate loss of ongoing income, financial uncertainty, potential debt, concerns around home ownership and mortgage repayments).
- **Health** (stress, anxiety and depression).

Overall impact on pupils

Overall there may be impacts on all pupils who currently attend Cymer Afan Comprehensive School and make the transfer and to those pupils who would otherwise attend there were it not for this proposal. Pupils may experience anxiety and stress relating to the change in school, such as adapting to new routines, staff, facilities and peers.

There is also likely to be an increase in travel time for pupils transferring to the new school site. This may in turn result in personal impacts, as well as impacts on educational attainment as additional travel time potentially could lead to increased tiredness, and result in a reduction in the time available for school work at home.

Positive impacts are likely to occur through the opportunities afforded to pupils receiving their education in a 21st Century new build school with improved teaching and learning facilities. The larger number of pupils will provide better opportunities for greater social interaction and breadth of experiences, resulting in a positive impact on pupils.

Age Pupils

This group will be disproportionately impacted by the closure of Cymer Afan Comprehensive School. Those who are already attending Cymer Afan Comprehensive School are likely to have different experiences to those who will start at Ysgol Cwm Brombil in Year 7 as they will be transferring from their present secondary school setting to a new secondary school provision in a different location with accompanying change in education delivery.

There could be a greater impact on pupils who will be making the transfer in Key stage 4 as the change will occur at a key point in their secondary education.

Thorough planning for transition at both key stage 3 and key stage 4 should result in positive experiences for pupils during the period of change.

Staff

For older staff members who are made redundant from the school closure, there are potential disproportionate negative impacts. Research suggests that those who are older when they are made redundant experience barriers in returning to employment, potentially facing challenges in securing interviews for new positions.⁶ According to Age UK research, once unemployed, only 23% of people aged 50 years or above secured a new job in three months (compared to 35% of 35-49-year olds).⁷

⁵ Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales'

⁶ Leeds University Business School (2004): 'The Economic and Social Impact of Redundancies from Corus and Allied Steel and Wire in Wales'

⁷ Age UK (2013): Older Workers at High Redundancy Risk available at: <https://www.ageuk.org.uk/latest-press/archive/older-workers-at-high-redundancy-risk/>

Disability

Pupils

There are potential negative impacts associated with transferring schools for some pupils who are disabled. For example, pupils with autistic spectrum conditions may experience difficulties in the transfer process that can negatively affect educational attainment and general well-being. These pupils may find adapting to the routines, expectations and social relationships of a new school environment more challenging than others.⁸

Local authorities are required to assess the travel needs of learners who are aged under 19 in their area. This includes those who they are legally required to provide transport for and those for whom they may wish to provide discretionary transport when assessing travel needs. An authority is also required to have regard for the needs of disabled learners and learners with learning difficulties.

There are potential positive impacts for some pupils with disabilities due to the new build school meeting all accessibility regulations and complying fully with the Equality Act 2010 requirements. Support for SEN/ALN in the new school is likely to be at least as good as current provision and in some aspects provision will be improved, for example larger pupil population and larger staff population can enable greater access to specialist staff and services. Local authority learning support service staff can provide additional support for pupils with SEN during transition and through the early stages of attending the new school.

Staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

Gender Reassignment

Pupils and staff

The evidence review does not indicate any disproportionate or differential need for this protected characteristic group.

However for the pupil who is currently undergoing counselling for possible future gender reassignment the impact of this proposal could be negative as the transition to a new school may cause stress and anxiety.

There are possible positive impacts due to the larger peer group which will occur in the new school meaning that there may be other pupils who are undergoing similar experiences and can provide peer support, as well as helping to lessen the chance that individuals may be easily identifiable and therefore at risk of victimisation. Additionally greater numbers of staff could mean access to more specialised support for the pupil if required.

The new build will facilitate easier management of the practicalities of gender reassignment, for example the new build will have unisex toilet facilities and opportunities for private changing rooms for pupils.

Marriage and civil partnership

Pupils and staff

Due to their age, pupils have been scoped out.

The proposal does not directly discriminate against this protected characteristic group.

⁸University of Manchester (undated), The impact of primary-secondary school transition for children with autism spectrum conditions: a longitudinal, mixed-methods study, available at: <http://documents.manchester.ac.uk/display.aspx?DocID=20008%20>

Pregnancy and maternity

Pupils and staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

Race

Pupils

There are potential positive impacts associated with transferring schools for pupils regarding views on race and ethnicity. Dyffryn School (the proxy school for Ysgol Cwm Brombil) data reveals that the school has a higher percentage of BAME pupils at 9% than Cymer Afan Comprehensive 0.4% and Neath Port Talbot secondary aged pupils 6%. Research suggests that mixed schools (defined as schools with intergroup contact) result in more social mixing between ethnic groups, and that pupils generally have more positive attitudes towards those from different ethnic groups.⁹ The current demographic makeup of Cymer Afan Comprehensive School (as described in section 2) would likely mean that pupils at this school would not report having close outgroup friends.

Staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

Religion or belief

Pupils and staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

Sex

Pupils

There are potential negative impacts associated with transferring schools for pupils of different sex:

- Due to the disruptive nature of transition, which requires students to adapt previously-learned behaviour patterns to new demands and more challenging environments. This may have a strong negative impact on peer relations and the students' academic achievement. Research indicates that boys can find adapting to a new school routine more challenging than girls, as boys self-report increases in school problems during transition periods.
- Girls can find forming new friendship groups more challenging than boys, with research suggesting that girls perceived that close friend support and school support declined during transition.¹⁰

Data for Dyffryn School (PLASC 2018) indicates that the pupil population consists of 51% girls and 49% boys, this is comparable to Cymer Afan Comprehensive's 52% girls and 48% boys, suggesting that Ysgol Cwm Brombil would have a similar gender balance to that experienced by pupils currently in Cymer Afan Comprehensive. This is comparable to figures held for Neath Port Talbot and all Wales where the gender balance is approx. 50% boys and girls, and 49% girls and 51% boys respectively for school years 7-11. There is no risk of pupils of either gender suffering a particular disadvantage as a result of this proposal. It does not therefore give

⁹ Department for Education (2017), Diversity and Social Cohesion in Mixed and Segregated Secondary Schools in Oldham, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634118/Diversity_and_Social_Cohesion_in_Oldham_schools.pdf

¹⁰ R. Hanewald (2013): Transition Between Primary and Secondary School: Why it is Important and How it can be Supported available at: <http://ro.ecu.edu.au/cgi/viewcontent.cgi?article=1952&context=ajte>

rise to a risk of discrimination on grounds of sex.

Positive impacts could occur through the proposal as pupils of both genders will have the opportunity to make new friends and become part of a wider friendship group. Transition events should include sessions for new pupils to meet their peers and organised social activities across a range of interests including sport, drama and music will encourage and develop friendships with other pupils who share the same interests.

Staff

There is a risk that female staff members will be placed at a particular disadvantage, as they make up 72% of the staff body. However, there is no risk of indirect discrimination, as the proposal is pursuing a legitimate aim (namely, that of improving the quality and efficiency of education in the Council's area) and is proportionate to that aim.

Stress and anxiety associated with redundancy may disproportionately impact upon women. 72% of staff at Cymer Afan Comprehensive are female and a greater number of females than males are employed in support roles. Research indicates that women are nearly twice as likely to experience anxiety as men, and that women are more likely than men to have a common mental health problem.¹¹

Experiences of stress repeatedly over a prolonged period, can impact sleep, memory, eating habits. Research has also linked long-term stress to gastrointestinal conditions like Irritable Bowel Syndrome (IBS), or stomach ulcers as well as conditions like cardiovascular disease.¹²

Positive impacts could occur through support given to obtain employment elsewhere in the local authority, including in new build schools which can improve teaching and learning experiences for staff and pupils, or in a larger school where greater numbers of staff can help to reduce workload and provide enhanced career opportunities.

The proposal will have a disproportionate impact on female members of staff. However, this impact is justified because the Council is pursuing a legitimate aim.

Sexual orientation

Pupils and staff

The evidence review does not currently indicate any disproportionate or differential impacts for this protected characteristic group.

Welsh language

Pupils and staff

Both Cymer Afan Comprehensive and Ysgol Cwm Brombil are English-medium schools where Welsh is taught as a second language. A Welsh language impact assessment found that Welsh language provision at Ysgol Cwm Brombil should be at least comparable with the offer at Cymer Afan Comprehensive school. In fact, there are potential positive impacts for pupils associated with transfer of schools as, with a larger cohort, there will be more opportunities to develop Welsh language skills.

Income deprivation

Pupils

Although income deprivation is not a protected characteristic as defined by the Equalities Act

¹¹ Mental health foundation (undated) mental health statistics: anxiety

¹² Mental health foundation (undated) Stress

2010, children from an economically deprived background can have a different experience of transferring schools. Research conducted by the Joseph Rowntree Foundation indicates that children from all backgrounds see the advantages of school, but deprived children are more likely to feel anxious and unconfident about school.¹³ Positive impacts could result however due to the increased level of pupil support available in Ysgol Cwm Brombil.

There may be a disproportionate impact on women as there are 2.8m lone parent families in the UK and approx. 90% of single parents are women. Children in single parent families are twice at risk of living in relative poverty than those in couple families (poverty rates are 47 per cent and 24 per cent respectively).¹⁴

The requirement to purchase a new school uniform may disproportionately impact upon lower income families. Often, where possible, uniforms are 'handed down' within lower income families – this would no longer be possible as children would now attend a different school with a different uniform requirement. The Children's Society estimates that the average yearly spend on secondary school uniforms totals £316, and that a quarter of a million UK children attend a school based on the cost of the uniform.¹⁵

As local authorities have a legal duty to provide free home to school transport for learners of compulsory school age (for those attending secondary school the distance is 3 miles or further from the nearest suitable school) pupils from families with low incomes are likely not to be impacted by any increased travel costs.¹⁶

The costs of extra transport for pupils to access extracurricular provision is not provided by the local authority in any of the secondary schools in Neath Port Talbot, and this could impact negatively upon Cymer Afan Comprehensive pupils from low income families. All schools make provision to meet the needs of their pupils and Ysgol Cwm Brombil Governing Body have indicated that this will be a matter for their consideration should the proposal proceed.

Other negative impacts on families on low incomes may be caused through the difficulties in travelling to Ysgol Cwm Brombil to attend parents' evenings, school events or to collect pupils who may become ill during the school day. These are not uncommon situations across the local authority where pupils attend schools some distance away from their place of residence, however this can be managed by the school senior leadership team and Governing Body with the support of the Local Authority if required, to ensure measures are put in place to plan for these eventualities.

In June 2018 the Cabinet Secretary for Education announced increased funding for provision of uniform grants and greater financial assistance for disadvantaged learners through the introduction of the Pupil Development Grant-Access, including support to enable learners to engage in extracurricular, enrichment and after school activities. This could mitigate against the negative impacts of the proposal on disadvantaged pupils.

Staff

Teaching and support staff are at risk of redundancy. There are a greater number of females than males employed in in Cymer Afan Comprehensive. Support staff are generally lower paid

¹³ JRF (2007): Experiences of poverty and educational disadvantage, available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2123.pdf>

¹⁴ <https://www.gov.uk/government/statistics/households-below-average-income-199495-to-201516>

¹⁵ The Children's Society (2015): Cost of School for Children in Poverty, available at: <https://www.childrenssociety.org.uk/sites/default/files/Queen%27s%20Speech%20-%20Cost%20of%20School%20for%20Children%20in%20Poverty.pdf>

¹⁶ National Welsh Assembly (2016) Home to school transport - a guide for constituents

and staff within this category who reside within the Afan Valley may have greater difficulty with redeployment, as they may experience greater challenges with travel costs.

This proposal could disproportionately impact on females however, the Council is pursuing a legitimate aim through improving the quality and efficiency of education in the Council's area and the decision to publish the proposals to discontinue Cymer Afan Comprehensive school is a proportionate means of achieving that aim.

Enhancements and mitigations

All pupils:

Possible enhancement or mitigation measures may include:

- Informing pupils of transition arrangements; for vulnerable students a range of support services are available from Cymer Afan Comprehensive and Ysgol Cwm Brombil, and the local authority
- Regular correspondence with pupils, and with parents/carers to ensure that they are aware of changes and able to support their children
- Home to school transport provided at no cost for eligible pupils
- 21st century school environment enhancing pupil well-being, improving motivation and pupil involvement
- Special taster sessions for new pupils at the new school so that pupils are aware of the layout of the school and can meet their peers.
- A larger pupil cohort and teacher base increasing the opportunity for wider peer social interaction/friendship groups and greater positive role model experiences

All staff:

Possible enhancement or mitigation measures may include:

- All school based staff will be supported by the relevant school policies and procedures which will include full consultation.
- The Council has secured an 'employer's pledge' with schools whereby school governing bodies have agreed to consider employing staff facing redundancy at any Neath Port Talbot County Borough Council school.
- Employees identified at risk of redundancy will be given access to the Council's prior consideration register.

Disability:

Currently any pupil with a disability is assessed on an individual basis and relevant modifications, adaptation or reasonable adjustments made where applicable. This is the case for all types of disabilities, to ensure that any impacts caused by the transfer process are minimised it is recommended that a transition plan is put in place for each pupil. This could include:

- Planned communication between the schools to ensure pupil needs are understood to support work to ensure each pupil's statement or individual education plan has been reviewed, and appropriate provisions have been made.
- Regular correspondence with parents/carers to ensure that they are aware of changes.
- Special taster sessions for new pupils at the new school so that pupils are aware of the layout of the school.
- Transport provided free to eligible pupils, with individual pupil needs assessed and adjustments made as identified
- Local authority learning support service staff can provide additional support for pupils with SEN during transition and through the early stages of attending the new school.
- Larger staff population enabling greater access to specialist staff

- New build school meeting all accessibility regulations and an area of the building has already been designated as a student services hub, where all pupils can access support services.
- Ysgol Cwm Brombil has appointed a Special Education Needs Coordinator (SENCO) and an Additional Learning Needs Coordinator (ALNCO) to oversee the range of needs that will be present in the new school.

Race:

To enhance the possible positive impacts, actions may include:

- Encouraging socialising/mixing between pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include:
- Special taster sessions for new pupils at the new school so that pupils can meet their peers.
- Organised social activities across a range of interests including sport, drama and music.

Sex:

To help minimise the possible negative impacts actions may include:

- Awareness raising with parents and educational professionals of the potential difficulties that could be experienced by pupils of different sexes during times of transition and communicating the potential need to be more sensitive and responsive to students, so that they feel nurtured and supported during the transition period.¹⁷
- Special taster sessions for new pupils at the new school so that pupils are aware of the layout of the school, the timetable and the teachers and are aware of the new school routine in advance
- Encourage pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include
 - Special taster sessions for new pupils at the new school so that pupils can meet their peers
 - Organised social activities across a range of interests including sport, drama and music.

(b) Impact on the Welsh Language

The school is an English-medium school, therefore pupils are taught through the medium of English, although Welsh is taught as a second language in line with the National Curriculum. It is proposed that pupils will transfer to Ysgol Cwm Brombil, which is also an English-medium school.

A separate Welsh Language Impact Assessment has been undertaken to assess potential impacts the closure may have on the Welsh Language. This Impact Assessment concluded that *'Welsh language standards are good at Dyffryn School (the proxy school for Ysgol Cwm Brombil) and combined with the advantages of a larger pupil cohort where there will be more opportunities to develop Welsh language skills, transfer to Ysgol Cwm Brombil should result in a positive impact on Welsh language development for Cymer Afan Comprehensive school pupils. As such, the Council is satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive school.'*

NPTCBC has developed a Welsh in Education Strategic Plan and action plans produced as part of this strategy will be applied to Welsh-medium education and Welsh as a second language across all schools in the local authority.

¹⁷ R. Hanewald (2013): Transition Between Primary and Secondary School: Why it is Important and How it can be Supported available at: <http://ro.ecu.edu.au/cgi/viewcontent.cgi?article=1952&context=ajte>

Actions (to increase positive/mitigate adverse impact).
Action any points raised as part of the Welsh in Education Strategic Plan

Section 4 - Other Impacts:

(a) Equalities

Public Sector Equality Duty (PSED)

- to eliminate discrimination, harassment and victimisation;
- to advance equality of opportunity between different groups; and
- to foster good relations between different groups

Possible impact on meeting the Public Sector Equality Duty

This EqIA has been undertaken to fulfil the Council's statutory duties under s149 of the Equality Act 2010 and reg.8 of the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. The Public Sector Equality Duty (PSED) is set out at section 149 of the Equality Act and is provided in full in Figure 7 below. The PSED requires that public authorities – such as government departments, local authorities and others delivering public functions have due regard to the three equality needs in the exercise of their functions.

The PSED requires public bodies to consider the likely impact of the policy under consideration before deciding whether to take a decision. In this way the PSED plays a role in in shaping policy, in delivering services and in relation to their own employees.

Figure 7: Section 149 of the Equality Act 2010: The Public Sector Equality Duty

- (1) A public authority must, in the exercise of its functions, have due regard to the need to—
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Source: Equality Act 2010

Public authorities must demonstrate that they have shown due regard to the three equality needs set out in section 149 throughout the policy development process. The PSED is intended to support good decision-making – it encourages public bodies to understand how different people will be affected by their activities. This means policies and services are appropriate and accessible to all and meet different people's needs.

The Council is proposing to discontinue Cymer Afan Comprehensive school and make arrangements for pupils who would have attended there to receive their secondary education at Ysgol Cwm Brombil.

Under this proposal pupils would be transferring to a new build school which will be a state of the art 21st Century building and therefore will be fully compliant in terms of the requirements for disabled pupils. It will also enhance teaching and learning experiences for pupils, create opportunities to improve social interaction due to a larger peer group made up of a more diverse pupil population, and provide pupils with greater access to support for a wide range of additional learning needs.

Cymer Afan Comprehensive school and Ysgol Cwm Brombil are approximately 10 miles apart, requiring pupils to travel an alternative route to school. The Council has assessed relevant routes for their suitability, and will make arrangements for eligible pupils to receive free school transport. School journey and the travel times will be appropriate for pupils aged 11 to 16 years. Ysgol Cwm Brombil temporary Governing Body have indicated their willingness to consider how to best support pupils to facilitate the opportunity for all pupils to access extra curriculum activities.

Pupils who choose not to attend Ysgol Cwm Brombil may be able to attend a school elsewhere subject to parental choice and availability of places in the identified school. Pupils may also be eligible for free transport to a school other than Ysgol Cwm Brombil in line with the home to school transport policy criteria.

It is recognised that the proposal will have a negative impact on the staff due to loss of employment. Staff may have the opportunity to apply for positions at schools elsewhere, as will governors, although the arrangements for federation in the upper Afan Valley will continue.

Additionally, the Council has secured an 'employer's pledge' with schools whereby school governing bodies have agreed to consider employing staff facing redundancy at any Neath Port Talbot County Borough Council school. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. For those staff members who are employees of centrally delivered catering and cleaning services due to the flexibility of this service there may be opportunities within the service area for staff to transfer to other schools or venues. Other school support staff will be supported by the relevant school policies and procedures which will include full consultation.

Previous experience has shown that some staff wish to secure employment in an alternative school but others take the opportunity to take on new challenges elsewhere. The Council is proud of its track record for supporting staff in such situations.

NPTCBC aspires to deliver an inclusive education service. All schools have policies in place to prevent discrimination, harassment and victimisation both for the benefit of pupils and school staff.

Work already done to improve the above

Details of the actions taken to mitigate or enhance possible impacts are detailed in section 3.

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

Pupils:

- 21st century school environment enhancing pupil well-being, improving motivation and pupil involvement made available in Ysgol Cwm Brombil for pupils of the upper Afan Valley
- Home to school transport provided at no cost for eligible pupils
- Individual pupil needs assessed and supported accordingly
- Ensuring pupils are supported through well planned transition events
- Regular correspondence with pupils, and with parents/carers to ensure that they are aware of changes and able to support their children

Staff

- All school based staff will be supported by the relevant school policies and procedures which will include full consultation.
- Employees identified at risk of redundancy will be given access to the Council's prior consideration register.

Actions to advance equality of opportunity

- 21st century school environment benefits made available in Ysgol Cwm Brombil for pupils of the upper Afan Valley to include
 - Improved teaching and learning provision
 - Greater access to specialised staff and resources
 - Modern building standards ensuring accessibility and DDA requirements are met
 - Broader curriculum provision, particularly for key stage 4 pupils
 - Opportunities for wider peer social interaction

Actions to foster good relations

- Encourage and develop relationships between the different groups of pupils in Ysgol Cwm Brombil through
 - Organised social activities across a range of interests including sport, drama and music.
 - Taster days for Cymer Afan pupils to meet Cwm Brombil pupils and establish friendships
- Encourage community interaction through
 - Pupil attendance at events at or around Ysgol Cwm Brombil to encourage a sense of belonging to the larger school community
 - Pupil presence at events and activities in the upper Afan Valley community to maintain the links with the communities where pupils live

(b) Reduce Social Exclusion and Poverty

Possible impact

As detailed in section 2, Cymer Afan Comprehensive school currently has a higher than average proportion of pupils eligible for free school meals (eFSM) at 31%; the average for the Local Authority is 22% and 17% for Wales.

The school has an above average population of pupils who are deemed to have additional learning needs, (34%) . The school also has a minority population of pupils who are looked after children (1.9%).

Work already done to improve the above

Cymer Afan Comprehensive school receives a Pupil Development Grant (PDG), as is the case for all schools in Neath Port Talbot who have pupils on roll who are eligible for free school meals (e FSM). The school chooses to use the grant to fund teaching assistants to provide intervention programmes to improve pupil outcomes and well-being. It is also used to resource of an intervention facility managed by two members of staff who work one to one with pupils from vulnerable groups in an effort to improve literacy and numeracy skills.

Additionally local authority services provide support for vulnerable pupils, which includes Social, Emotional and Behavioural difficulties support workers, the Education Welfare officer, the Looked After Children support officer, the educational psychologist service and school counsellor, in line with other schools in Neath Port Talbot with vulnerable pupils.

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

NPTCBC believe that Dyffryn School (Dyffryn School is used by the Council as a proxy for the new school) offers at least the same level of support for eFSM and vulnerable pupils as Cymer Afan Comprehensive and as such the efforts to reduce social exclusion and poverty will continue.

Currently, at both schools:

- engagement officers work closely with individual pupils to support them in developing their emotional well-being and resilience so that they are more equipped to deal with the challenges that school presents and that often act as barriers to their learning; and
- literacy and numeracy support officers work with individual eFSM pupils identified as needing additional support (through the POD facility in Cymer Afan and through a facility labelled 'COPE' in Dyffryn).
- PDG

This provision will continue in Ysgol Cwm Brombil and will benefit Cymer Afan pupils should the proposal be implemented.

Additionally Ysgol Cwm Brombil has identified an area of the new building which has already been designated as a student services hub where all pupils will be able to access additional support appropriate to need. This is likely to improve provision for support for Cymer Afan pupils as a wider range of services will be available to them than those they experience currently.

(c) Community Cohesion

Impact on Community Cohesion

There are potential positive impacts associated with transferring schools for pupils regarding community cohesion. Research suggests that mixed schools (defined as schools with intergroup contact) result in more social mixing between ethnic groups, and that pupils generally have more positive attitudes towards those from different ethnic groups. In contrast, in predominately White-British schools, pupils in the study reported having no close outgroup friends towards the end of their first year of secondary school.¹⁸ Cymer Afan Comprehensive school has only one BAME pupil; BAME pupils at Dyffryn School (the secondary school currently serving the area) represent 8% of the

¹⁸ Department for Education (2017), Diversity and Social Cohesion in Mixed and Segregated Secondary Schools in Oldham, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634118/Diversity_and_Social_Cohesion_in_Oldham_schools.pdf

pupil cohort. The additional BAME cohort increases opportunities for cultural awareness and integration, and positively supports community cohesion.

A community impact assessment has been carried out in line with the requirements of the School Organisation Code. This is an assessment of the impact on community usage of those facilities and services currently available at Cymer Afan Comprehensive school. The assessment recognises the importance of Cymer Afan Comprehensive school and the part it plays in the wider community. Community provision and activities that have been developed over an extended period at the school site will be displaced under this proposal; however opportunities exist to relocate activity from the school to alternative locations and the area under review is well served by community facilities. The assessment reports that these locations can be enhanced as appropriate with no loss of amenity to the wider community and recommends that plans are put in place to mitigate any loss.

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

Actions to enhance the possible positive impacts may include:

- Encouraging socialising/mixing between pupils who transfer from Cymer Afan Comprehensive School to establish new peer/friendship groups. This could include:
- Special taster sessions for new pupils at the new school so that pupils can meet their peers.

Actions to mitigate for loss of amenity to the wider community could include:

- Negotiations with 'Llandarcy Park Ltd' and the 'NPTC Group' to relocate the school Fitness Suite to the Afan Valley Swimming Pool. This would involve infilling the Learner Pool to create a separate gym facility which would augment the current pool usage, the recently installed sauna and the jacuzzi that is being planned for. Initial concept plans have been drawn up following the UAV Sports Facilities Feasibility Study completed by 'Community Design Gwent' in May 2009.
- Displacing the Youth Club that is staged on a Tuesday and Friday to the Cymer Afan Primary school Sports Hall. This has the capacity to accommodate the 48 individuals that make use of the Service in 2016/17.
- Transferring management of the Red Field to the Croeserw F.C. If this proved to be uneconomic in the short to medium term the playing field would revert back to nature with the football club then concentrating its fixtures on Tudor Field.
- Making new management arrangements for the Cymer Afan Primary School Sports Hall and floodlit artificial turf pitch. Consultees felt there was insufficient administrative support within the primary schools to undertake this function in the absence of the Comprehensive School and a Business Manager. Initial discussions have been held between 'Llandarcy Park Ltd' and the Local Authority with regard to managing the Sports Hall and the artificial turf pitch at arm's length from the Afan Valley Swimming Pool. This will need to be further explored.
- Displacing community hires such as 'Slimming World' to an alternative location such as the Croeserw Community Enterprise Centre.
- Renewing the management capacity of the four remaining federated primary schools to ensure the continued benefit of shared leadership, staffing, buildings, IT, facilities and experience is enjoyed.

Section 5 Consultation and Engagement

Consultation and engagement undertaken (e.g. with the public and/or members of protected groups) to support the views in section 3 and 4

On 9th November 2017, the Neath Port Talbot Council's Education, Skills and Culture Cabinet board decided to consult on the future of education in the upper Afan Valley. A consultation of stakeholders at the Cymer Afan Comprehensive School, interested parties and the wider community was undertaken between 11th December 2017 to 14th February 2018. The full list of consultees is available in Appendix A of the 'Future of Secondary Education in the Upper Afan Valley Consultation Report' (2018). On 20th June 2018 the Council determined to publish its proposal allowing 28 days, i.e. until the 23rd July 2018 for the receipt of objections. The Council's response to the objections received is available in the "The 'Future of Secondary Education in the Upper Afan Valley Objection Report' (2018).

Through this consultation and engagement, stakeholders and objectors expressed a number of concerns related to the potential equality impacts of the proposal to close Cymer Afan Comprehensive School. The impacts that were identified by stakeholders were understood to have the potential to affect those with a disability and children aged 16 and under, which are protected characteristics under the Equality Act 2010, as well as those suffering from deprivation, who would also be vulnerable to the effects of the decision.

Impacts on pupils from deprived backgrounds

Through this consultation, concerns were raised about the impact of moving school on vulnerability of deprived students, who are already a vulnerable group, as moving schools is an indicator of deprivation for the local authority's Vulnerability Assessment Profile (VAP).

- Moving schools is included in the VAP because pupils who move many times during their school years can increase risk of underachievement, and that the purpose of the VAP is not only to identify vulnerable pupils, but also to ensure the school and local authority plan and provide for their needs and provision.
- The Council believes that the impact of the proposal would remain the same in this regard, as the pupils that have been identified by the VAP will still be included in and catered for by this tool.

Stakeholders and objectors also raised concerns about the potential negative impacts of moving from a smaller school to a larger school on academic performance, and how this would specifically impact on deprivation.

- Estyn's report 'School Size and Educational Effectiveness' (December 2013) suggests that larger schools of 1,101 pupils or more outperform small secondary schools of less than 600 pupils, and that larger schools were found to require less 'significant improvement' or 'special measures', and were found to have greater pupil well-being
- Neath Port Talbot has the second highest number of pupils entitled to free school meals in Wales, and that it could be argued that all schools in the County Borough are affected by deprivation to some degree (which implies that the impact of school size is negligible).
- There are potential positive impacts to be gained from moving to a larger school as a larger pupil population provides greater resources available to support pupils, and more opportunities for pupils to benefit from social interaction with a wider peer group

Impacts on pupils with a disability

Through this consultation and engagement, concerns were raised around the impact of losing existing successful working relationships between Additional Learning Needs (ALN)

pupils and staff at Cymer Afan Comprehensive school.

The Council supports all schools in making provisions for pupils with ALN, and both Cymer Afan Comprehensive and Dyffryn School have ALN pupils (Dyffryn School is used by the Council as a proxy for the new school). Dyffryn School have around 200 (24%) pupils with ALN, and they have introduced a range of strategies, including the use of a school-based counsellor, to improve pupil resilience and well-being. The intervention programmes taking place in the Place of Development (POD) facility, which has been reported by Estyn in 'Inspection report Cymer Afan Comprehensive School (2015) to be of high quality, are similar to the programmes taking place in all secondary schools in Neath Port Talbot. For example, the Emotional Literacy Support (ELSA) programme, which is provided by the POD, is also provided at Dyffryn School.

- The Council believes that the support currently received by ALN pupils at Cymer Afan Comprehensive is likely to be of at least the same standard if they transfer to Ysgol Cwm Brombil, and that Cymer Afan Comprehensive's robust and thorough identification and monitoring of ALN pupils' needs, and the creation of high quality individual education plans, will all aid in the transition to Ysgol Cwm Brombil. The transition will be supported by work between Cymer Afan Comprehensive and Ysgol Cwm Brombil to ensure each pupil's statement or individual education plan has been reviewed, and appropriate provisions have been made.
- Additionally, Ysgol Cwm Brombil has appointed a Special Education Needs Coordinator (SENCO) and an Additional Learning Needs Coordinator (ALNCO) to oversee the range of needs that will be present in the new school, and an area of the building has already been designated as a student services hub, where all pupils can access support services.
- Pupils would be transferring to a new build school which will be a state of the art 21st Century building and therefore will be fully compliant in terms of the requirements for disabled pupils, and will offer enhanced teaching and learning facilities.

Impacts on children aged 16 and under

During the consultation and engagement, stakeholders and objectors raised concerns related to impacts of closing Cymer Afan Comprehensive and moving school on children aged 16 and under. These included comments on the impact of moving to a school that could be of lesser quality, the disruption in learning caused by closing the school, and the impact of longer travel distances and travel times to and from school on the children's health, well-being and education.

- Statistics published by the Wales National School Categorisation System for 2016 and 2017 imply that Dyffryn School is outperforming Cymer Afan Comprehensive in GCSE achievement. Dyffryn School has also been categorised as a 'green' support category school for 2017-2018, indicating that it requires the least support and is a highly effective school with a track record in maintaining a high level of learner outcomes, whereas Cymer Afan Comprehensive School is within the 'yellow' support category, which indicates that it requires slightly more support, and is an effective school with a track record in maintaining good learner outcomes. Estyn state that overall, the proposal is likely to at least maintain the standards of education and provision in the area.
- Should the proposal be approved, pupils will start as a group at Ysgol Cwm Brombil in September 2019, the beginning of the school year, and this move will be preceded by planned transition events for pupils, regular staff meetings to discuss pupils, curriculum arrangements. ALN support, and other endeavours to support the move. In addition, care will be taken to plan for pupils in Year 10 and 11 who will be sitting GCSE examinations at the time of the move, in order to minimise disruptions.

- The Council believes that the move is unlikely to have a detrimental impact on attainment; data gathered from another recent school reorganisation project with a similar pupil cohort has demonstrated that those pupils exceeded expectations at the end of key stage 4 and it is to be expected that this would be the case in this situation also.

A comment was raised around the impact of losing the expertise of secondary school teachers, who currently provide some specialist curriculum to primary pupils.

- The Council recognises that if the secondary school were to close then secondary staff who work across the federation may no longer be available and the delivery of some more specialist curriculum areas in the primary schools could be lost. It is anticipated that a partnership between Ysgol Cwm Brombil and partner primary schools in the upper Afan Valley will be developed further and could include similar specialist teaching as is currently experienced.

A number of stakeholders and objectors were concerned about the potential detrimental impacts of the long bus journey to the new school on the children's health, safety and education.

- The Council acknowledges that for some pupils the ability to walk or cycle from home to school will be lost under this proposal, which has detrimental impacts on health. To mitigate this, the school will provide curricular and extra-curricular opportunities to take part in activities that promote fitness and health, and opportunities to learn about the importance of a healthy lifestyle.
- The Council notes that current school travel arrangements have pupils travelling to Cymer Afan Comprehensive by bus, and that future arrangements can be made to have the bus pick students up at points that would better facilitate walking or cycling to the bus stop. The Council considers travel by bus to the new school to be the most reasonable mode of transport, and that the journey time is of a reasonable length (45 minutes to the farthest community each way)
- The Council's response to concerns raised around the impact of the long journey on well-being is that discussions with pupils imply that the experience of the bus journey is an individual experience, which can either increase stress and anxiety, or be an enjoyable and productive experience, and that evidence implies that the journey should not have a significant impact on well-being.

Additional comments were made regarding the potential detrimental health impacts of increased pollution, due to increased road travel to and from the new school.

- The Council encourages families to make use of the free home to school travel services.
- To address concerns around impacts on education due to having to rise earlier for the journey, and potentially spending less time participating extra-curricular activities including visiting the pool and the library, Ysgol Cwm Brombil will seek to put in place the necessary arrangements to ensure pupils have adequate access to extra-curricular activities.

Impacts on deprivation in the Upper Afan Valley

There were concerns raised about the effect of school closure on the deprivation in the community, due to the jobs that will be lost.

- Should a decision be taken to close the school, all staff with contracts attached to Cymer Afan Comprehensive School will be declared redundant, and these employees will be supported by the Council's policies, which includes full consultation, and HR staff. While it is expected that some staff will take up positions at the new school, previous experience has shown that in a school reorganisation

some staff will seek work elsewhere.

Further concerns were raised around impacts of the school closure on deprivation in the community, as the closure could increase isolation of the upper Afan Valley from other parts of Neath Port Talbot.

- The Community Impact Assessment found that there are opportunities to relocate community-based activity from the school to alternative locations, with no loss of amenity to the wider community. It was also explained that the proposal is not intended to isolate the upper Afan Valley, rather, it is expected to expand opportunities and experiences for children and young people in the community. There is no impact on public transport or highway provision associated with this proposal.

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

The Council has responded to the potential impacts raised by responses to the consultation and has set out where and how they will mitigate potential adverse impacts, these should be monitored and action plans set in place to ensure their delivery.

Should a disproportionate impact on a particular protected group be identified, there is no real risk of indirect discrimination as the Council is pursuing a legitimate aim (improving the quality and efficiency of education in the Council's area) and the decision to publish the proposals to discontinue Cymer Afan Comprehensive school is a proportionate means of achieving that aim.

Section 6 – Post Consultation

Outcome of the consultation/objections

The outcomes of the consultation have been reported to the Council's Joint Cabinet and Education, Skills and Culture Scrutiny Committee on 20th June 2018.

Members determined to progress the proposal to the statutory notice period, commencing on 26th June 2018, allowing for 28 days for receipt of objections.

The outcome of the objection period will be considered by Members before final determination of the proposal on 6th September 2018.

Section 7 - Monitoring arrangements:

The arrangements in place (or those which will be put in place) to monitor the impact of this function, service, policy, procedure, strategy, plan or project:

Monitoring arrangements:

NPTCBC details that monitoring will be via:

- data received from each school;
- reports from challenge advisor Core Visits; and
- Estyn Inspection reports.

Actions: see action plan

Section 8 – Outcomes:

Officers have considered each of the three equality needs, as outlined above. No risk of direct discrimination has been identified, as the Council's proposal does not treat any person less favourably because of a protected characteristic. No risk of indirect discrimination has been identified. The way in which the proposal may affect different protected groups has been set out above. It has been identified that the proposal may have a particular impact on female members of staff (as they make up 72% of the staff of the school). However, any particular disadvantage suffered by a particular protected group does not give rise to real risk of indirect discrimination, as a decision to close Cymer Afan Comprehensive School will be pursuing a legitimate aim and is proportionate. The Council is pursuing a legitimate aim, namely that of improving the quality and efficiency of education for pupils in its area. The proposal is a proportionate means of achieving that aim, in light of all the mitigating measures set out above. Implementing the proposal will provide the pupils of the upper Afan Valley with a 21st century learning environment and increased learning opportunities. It will also enable the Council to make more effective use of its resources for investment in education. The conclusion of this assessment is that Outcome 1 is the course of action to be pursued.

Outcome 1: Continue the initiative...	<input checked="" type="checkbox"/>
Outcome 2: Adjust the initiative...	<input type="checkbox"/>
Outcome 3: Justify the initiative...	<input type="checkbox"/>
Outcome 4: Stop and remove the initiative...	<input type="checkbox"/>

Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Monitor impact on protected groups following closure of Cymer Afan Comprehensive (CAC) (subject to proposal implementation)	Director of ELLL, Head of Transformation, SSIP, EDS	Information gathered end of academic year 2019 -2020	Mitigating measures have been successful; enhancing measures have led to improved experiences for pupils	
Monitor transition arrangements for pupils from CAC to Ysgol Cwm Brombil (YCB)	SSIP, EDS, SFL, GB of both schools	Work undertaken throughout academic year 2018-2019. Review in Autumn 2019, further information gathered end of academic year 2019 -2020	Transition arrangements have ensured that all pupils who transfer to YCB are secure and confident about arrangements	
Monitor staff redeployment data for staff employed at CAC at point of closure	Director of ELLL, Head of Transformation, HR, SSIP	Information gathered end of 2019	Data demonstrates that where appropriate staff have been successfully redeployed	
Actions from WESP implemented at YCB as appropriate	Director of ELLL, Head of Transformation, EDS	Ongoing	WESP actions successfully implemented	
Monitor ALN provision at YCB to ensure vulnerable pupils are supported effectively	Director of ELLL, Head of Transformation, Inclusion support teams, EDS	Through academic year 2019 -2020	Vulnerable pupils are succeeding at YCB and are receiving effective support	
Support community groups to relocate services as applicable and as appropriate	Project development team	Ongoing	No loss to community facilities reported	

This page is intentionally left blank

Risk Assessment

Strategic School Improvement Programme – future of secondary education in the upper Afan Valley

Context

1. This risk assessment¹ has been carried out in line with the Council's Risk Management Policy 2015.
2. Implementing the proposal will result in the closure of Cymer Afan Comprehensive School with educational provision being made for the pupils at Ysgol Cwm Brombil which will subsequently serve the catchment of the upper Afan Valley.

The reasons for the proposal

3. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. 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 in order to ensure future provision is sustainable.
4. Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive School as part of a federation of five schools, four primary and one secondary.
5. Cymer Afan Comprehensive is by any measure a small secondary school. A school with 600 pupils or fewer is generally regarded as a small secondary school. Currently, Cymer Afan Comprehensive School has 229 pupils on roll.
6. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status.
7. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for approx. 640 pupils but with 229 pupils on roll it is carrying nearly 64% surplus capacity.

¹ First iteration: 311017 (rvg) /second iteration: 050618 (rc/rvg)

8. In the current financial year², Cymer Afan Comprehensive school receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average. This compares to £7,111³, per pupil during the previous financial year, approx. 60% above the average.
9. Cymer Afan Comprehensive school has backlog maintenance and accessibility costs amounting to c.£3m. The site is assessed as overall condition C, with many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years.
10. There is suitable, alternative English-medium provision available within the County Borough at Ysgol Cwm Brombil, which offers a new build 21st Century school, and at Cefn Saeson Comprehensive school. There is also suitable English-medium provision at Maesteg Comprehensive School.
11. The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Cwm Brombil, a £30m investment by the Council in a new build school with 21st century school facilities.
12. Teaching and learning opportunities are increased in new build state of the art facilities and an evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Risks associated with the proposal

13. The potential risks associated with the proposal comprise the Council's reputation, educational standards, financial management, staff employment and service delivery.
14. Potential risk areas in implementing the proposal include:

² School budget share allocation: 2018/2019

³ School budget share allocation: 2017/2018 as reported in the consultation document

- resistance to change leading to lack of pupil, parent and staff support
- educational standards not maintained
- loss of community facilities
- increased home to school travel time impacting on attendance and performance
- staff anxiety about job security
- negative impact on existing federation
- budget allocation insufficient to meet needs
- Welsh language not developed further

15. Failing to implement the proposal will result in the following teaching/learning and financial benefits not being fully realised, particularly in relation to:

- providing a stimulating and innovative teaching and learning environment that will impact positively on the self-esteem and well-being of all pupils
- access to a wider range of staff expertise
- opportunities for wider peer group interaction
- a more efficient and effective use of resources, and savings from economies of scale
- greater protection against the impact of a schools funding formula review
- reduction in the number of surplus pupil places and improving the school building environment

Risk assessment

16. The benefits of reorganisation, as set out above, together with the planned action measures in the table below will mitigate the effects of identified risks. A new school provides greater prospects for improving educational attainment for pupils. Estyn (Jan 2007) reported on the performance of schools before and after moving into new buildings, stating that ageing school buildings which are in a poor state of repair cannot meet modern teaching and learning needs. The report also states that inadequate buildings make improvements in standards more challenging and that in nearly all schools with new or refurbished buildings, pupils attainment and achievement have improved and in some cases the improvement has been significant.

17. To address staff anxiety about their employment situation all school based staff will be supported by the relevant school policies and procedures which will include full consultation. Previous experience has shown that some staff will take the opportunity to take on new challenges elsewhere. Employees identified at risk of redundancy will be given access to the Council's prior consideration register. The Council is committed to supporting staff at risk of compulsory redundancy and has secured the support and goodwill of the teacher associations/trade unions and governing bodies across the Council, via an employers' pledge. The Council has a good track record for supporting staff in such situations.
18. The distance between the upper Afan Valley and Ysgol Cwm Brombil is more than 3 miles, therefore assistance with travel will be provided to eligible pupils. Support with home to school travel will be made available in line with the Council's Home to School Transport policy. The Council is also obliged to provide transport to the nearest suitable school including schools Authority's area.
19. Whereas the need to understand and mitigate the impact of a school reorganisation proposal on a community is a right and proper consideration, the deciding factor in determining school organisation proposals should be one of securing the best educational offer for pupils.

Risk register

No	Risk description	L'hood score	Impact score	Overall Risk (Lxl)	Prox'ty *	Planned action to mitigate	Target Date	Owner	Update	Trend - Up - Down - No change
1	Resistance to change leading to lack of pupil, parent and staff support	5	4	High risk	1	Consultation meetings. Effective communication with pupils, parents and staff. Thorough transition planning	Spring/summer terms 2018	SSIP team Governing bodies and head teachers (Cymer Afan Comprehensive and YNM)	Consultation completed Feb 2018	No change
2	Educational standards not maintained	1	5	Low risk	4	Implementation of proposal, and appropriate support and challenge to ensure entitlements are met and provision delivered	Sept 2019 on going	SSIP team ELLLS Temp Governing Body (YNM) Head Teacher (YNM) Support for inclusion/school governance team		No change

3	Loss of community facilities	1	4	Low risk	1	Full committee usage impact assessment to be undertaken as part of the consultation. Outcome will inform decision making	Spring 2018	SSIP team	Community Impact Assessment completed Nov 18- all school based activities re able to be relocated	-	Down
4	Increased home to school travel time impacting on attendance and performance	2	4	Medium risk	2	Support available through Council's Home to School transport policy. EWO support for pupils and families	Autumn term 2019	Road Safety Team EWO service SSIP team		-	No change
5	Staff anxiety about job security	5	4	High Risk	1	Support made available for staff through relevant school and county policies	Summer/ autumn terms 2018	HR SSIP team		-	No change
6	Negative impact on existing federation	2	3	Medium risk	3	Planning and support provided for potential reorganisation of federation	Spring/ summer terms 2019	SSIP team ELLLS EDS Governing Body (federation)		-	No change

7	Budget allocation insufficient to meet needs	2	5	Medium risk	3	Implementation of proposal together with a formula funding review	2018/2019	ELLLS SSIP team		- No change
8	Welsh language development not developed further	1	3	Low risk	4	Welsh will be taught in line with the national curriculum guidelines for an English-medium school. A larger school presents greater opportunity for language diversity and development with potentially more Welsh speakers available on the staff complement.	Ongoing: 2019	ELLLS Temp Governing Body Head Teacher		- No change

This page is intentionally left blank

**Neath Port Talbot County Borough Council
Community Impact Assessment**

**The Upper Afan Valley – with a specific focus on Cymer
Comprehensive School**

1. Context

In preparing statutory proposals involving a school a Local Authority is required to assess the impact that the proposals may have on local families and the local community through the preparation of a Community Impact Assessment (CIA).

The Community Impact Assessment has been conducted in line with the guidance set out in Welsh Government's Circular No: 006/2013: 'School Organisation Code'.

*NB: This assessment report has been prepared for inclusion with the consultation document. It was informed by the process set out below. The assessment of the proposal's impact on the community has been further informed by responses to consultation. Additional information is contained within the consultation report and the subsequent Cabinet report together with the respective appendices. As such, this document complements, and is complemented by, the reports and impact assessments to which this document has been attached/ electronically linked, including the objection report and associated Cabinet report and appendices. In this regard, this document needs to be read in conjunction with the accompany reports and impact assessments.**

2. The Assessment Process

The Community Impact Assessment has been informed by:-

- A review of existing school/community interaction ¹
- Evidence from earlier school consultation events
- A composite audit of community facilities ²

*Narrative added: 140818

- Dialogue with partner Organisations to better understand current gaps in provision and their work in the community.
- Desktop study of secondary data ^{3,4}
- A Scoping Study embracing the Electoral Wards of Cymmer, Glyncoirwg and Gwynfi.
- A Mapping exercise extending across the whole of the Upper Afan Valley.

Interviews have been held with the Head teacher, Deputy Head, the school Business Manager, Governors and Council Elected Members associated with the Comprehensive school and the four feeder Primary schools. The findings from the interviews have been used to interpret the extent, type, frequency and duration of community activity within the Federation.

3. **The proposal**

The Council is proposing to make arrangements for the pupils who would otherwise attend Cymer Afan Comprehensive school to receive their secondary education at *Ysgol Newydd Margam*, a £30m new build investment by the Council offering English – medium provision in a 21st Century school setting.

Subject to the outcome of consultation and subsequent Member approval, *Ysgol Newydd Margam* will receive pupils from the upper Afan Valley on the 1st September 2019, with Cymer Afan Comprehensive School closing on the 31st August 2019.

4. **The School**

The school under review is centrally located within the upper Afan Valley. The Cymer Afan Comprehensive School is situated in the Cymmer Ward which comprises the villages of Cynonville, Dyffryn Rhondda, Cymmer and Croeserw.

The Afan Valley Wards have a rich history of coal mining. The streamlining of the coal industry has brought local unemployment and socio – economic deprivation. The reclaimed landscape is now one of largely rolling hills, grassland and forestry with wind

turbines that regularly puncture the horizon. Local amenities are within easy walking distance.

The population of the Ward of Cymmer is 1,743. The two adjoining Wards of Glyncorrwg and Gwynfi have a population of 1,096 & 1,362 respectively. Collectively the population of the upper Afan Valley is 4,201.

Cymer Afan Comprehensive School is an English medium, community school providing education for pupils aged 11-16 years. Since September 2013 it has been part of a five school federation in the upper Afan Valley. Schools within the federation maintain their own delegated budgets and identity but are able to explore the advantages of sharing resources such as facilities, IT, staff, school buildings, etc.

The school occupies a single site with direct management responsibilities for a sports hall and a floodlit Artificial Turf Pitch at the Cymer Afan Primary school site. The Comprehensive school has a terraced hard surfaced play yard with little in the way of biodiversity or natural greenery. A former swimming pool within the school has been in-filled to create a Fitness Suite for community use. There is a dedicated Youth Wing within one of the teaching blocks. The only green open space that the Comprehensive school can boast is that of the Red Field which sits in an elevated position on a hilltop above the school. This is maintained from the school budget and is the principle sports field for curricular PE.

As at October 2017 the school had 226 pupils on roll. The majority of pupils attending the school are from the immediate catchment of Cymmer, Glyncorrwg and Gwynfi. All three Wards have acute levels of deprivation – the Lower Super Output Area (LSOA) of Cymmer 1 is ranked 446 in the Welsh Index of Multiple Deprivation (WIMD) {where 1 is most deprived and 1,909 is the least}. The LSOA of Cymmer 2 is ranked 25; Glyncorrwg is 168 and Gwynfi 193. The degree of carlessness in Cymmer is 41.9%.

5. The degree to which the school buildings are used now as a community resource

Cymer Afan Comprehensive school can boast a number of on-site community facilities. These facilities have been developed over the years by prudent investment of external grant aid sourced from

local Wind Farms, Communities First funding and successful bids made to the Big Lottery Fund.

The school houses the Fitness Suite which is managed by 'Afan Community Fitness' volunteers. The Suite is a fully equipped gym comprising spin bikes, Steppers, treadmills, single station exercise equipment and free weights. The facility is open to the public on a week day evening between 4.00 p.m. and 8.30 p.m. and on a Saturday and Sunday between 9.00 a.m. and 12 noon. There are over 100 paid up members paying £15 a month. The gym offers Spinning classes and Boot Camp and operates a 'Gym Buddy' system for those that are new to exercise. The operating expenditure associated with managing the Fitness Suite is shared between the school and the volunteers.

There is a dedicated and long established Youth Wing within the school. A Youth Club is provided on a Tuesday and Friday evening. The average attendance per night at the Youth Club in 2016/17 was 7 attendees (total contacts 380 involving 48 individuals aged 11 – 25 years). Activities are demand-led and include arts & crafts, sport, games consoles, pool and table tennis, hair dressing, board games and advice upon smoking cessation, bullying, alcohol and good citizenship.

The school has entered into an agreement with the Croeserw F.C in the management and upkeep of the Red Field which is the school's principle outdoor playing surface. The field receives limited community use.

The school manages both the Sports Hall and the floodlit Artificial Turf Pitch (ATP) situated at the Cymer Afan Primary School site. Both the indoor and the outdoor facility operate at a 25% capacity utilisation between the community hours of 5.00 p.m. and 9.00 p.m. Users include Cwmavon RFC Minis and Juniors, Croeserw Juniors F.C, Nantfyllon RFC, Caerau Whites F.C and 5 x 60 Street Games. The Sports Hall and the ATP lend themselves to occasional Birthday parties and the S.H.E.P. Programme for school Year Groups 5, 6 & 7. The Local Authority provides financial assistance to the school as a means of deflecting the on cost associated with staffing these facilities.

The school has generous meeting space which is used by Social Services, WCADA, the Job Centre (and 'Tai Tarian' recruitment)

and for public meetings. Because of its central location ‘Slimming World’ use the school for their weekly meeting which is very popular attracting 80 weight watchers (the ‘Slimming World’ Club find the cost of hiring the Croeserw C.E.C. too prohibitive).

For completeness a review has been undertaken of the extent of community use of the federated Primary schools. This is very modest with extra-curricular netball in Pen Afan, Playgroup (Monday to Friday 9.15 a.m. to 11.45 a.m.) and Afan Tots (Wednesday 1.00 p.m. to 3.00 p.m.) in Cymer Afan Primary school.

The Cymer Afan Comprehensive School is the receiving centre for the federated Primary schools. The Headship reports good cross phase working and sharing of resources within the extended school day. This in turn strengthens the transition for the children.

6. Extent of community facilities within easy reach of the existing school

The number and type of community facilities within the Ward of Cymmer are both many and varied. The Mapping exercise has revealed a rich mix of amenities within easy walking distance and this is augmented with still further facilities in the adjoining village of Croeserw, less than one mile walking distance from the school. Further afield (2.5 miles) the villages of Glyncorrwg to the North and Gwynfi to the East also boast amenities that promote sport, health and community interaction (please refer to A1 Mapping exercise).

The community facilities within easy reach of the school include:-

- The Afan Valley Swimming Pool – now managed by ‘Afan Valley Community Leisure’ through ‘Llandarcy Park Ltd’/NPT College. In receipt of grants from the Fynnon Oer and Lynfi/Afan Wind Farms. Also a grant from the Big Lottery Fund (£344,000) to sustain operating costs over the next five years. Main income generated by public swimming lessons and classes. Also 30 pupils from the Comprehensive school enjoy 4 to 7 week block of tuition as part of the KS3 GCSE PE curriculum. Management intend to augment the pool with a

Steam Room and a Jacuzzi and there are further proposals for developing the area currently laid out as a Learner pool.

- Community Library /Tea Room (next to Health Centre and the equipped play area). Hosts a range of community based and Out of School activities including Cinema screenings, Tai Chi, Yoga, 'Needle & Yarn', Book Club and Art project.
- The Methodist Church and the Gilgal Community Church. The former hosting a charity shop and the latter a Food Bank.
- The Cymmer bowling green. The Club is trying to develop its junior section.
- The Croeserw Community Enterprise Centre (C.E.C.) which has a rich and varied mix of community and educational based activities. The Centre houses 'Little Wings Playgroup', a Youth Club with an average attendance per night in 2016/17 of 15 (total contacts 383 involving 67 individuals aged 11- 25), the Jobs Fair, the Me, Myself & I Friendship Club, the 'Hype Club' (OSH Activity Club for ALN), Adult Disability Fresh Start, the Crochet Club and a range of 'Community for Work' initiatives which lead to placements. The Centre has a Construction and Hairdressing suite, the Afan Village Café, conference/meeting rooms and an Artificial Turf Pitch. There are good education links with NPT College and young people study IT, GCSE English Language, English Literature, Maths and Childcare.
- Tudor Park – home to Croeserw F.C Seniors & Juniors, the Bowls Club, an equipped play area and the Social Club.

Further afield in Glyncorrwg there is the:-

- Noddfa Community Centre, now operated by a voluntary Halls Management Committee. The Centre offers a blend of activities of appeal to a wide audience. The facility hosts Flying Start, has a Youth Club, W.I .coffee mornings and bingo,50+ Club with 'NPT Age Connects', Craft and Welsh Classes, Job Club and a range of charitable fundraising activities. There are over 100 paid up Members.

- Ynysgorrwg Park – home to Glyngorrwg RFC and the recently re-established Glyncorrwg F.C. The site has an indoor barn, an equipped play area, a floodlit synthetic ERDC Field Turf pitch, a defunct bowling green and a football and rugby pitch. The Glyncorrwg RFC Clubhouse is the meeting place for local voluntary groups including the Glyncorrwg Ladies Choir.
- Glyngorrwg Ponds and Mountain Bike Visitor Centre (adjacent to the Business Development Centre and the Units that house Small and Medium sized Enterprise). This venue is world renowned for its mountain bike trails and is popular with anglers and walkers alike. The Centre hosts the ‘Corrwg Cwtch’ café and is a Dark Sky Discovery site for astronomy.

In the East there is the:-

- Gwynfi Miners Community Hall, again operated by a Halls Management Committee assisted by grants from the local Wind Farms. The Hall opens Monday to Friday 2.00 p.m. -8.00 p.m. with extended hours on a Thursday. There is a very popular Youth Club operating between 5.45 p.m. and 7.45 p.m. on a Wednesday with an average attendance per night in 2016/17 of 27 (total contacts 812 involving 98 individuals aged 11-25). Activities within the Youth Club setting include issues around physical and emotional health & well-being, WCADA talks, Homework Club, arts & crafts classes, dodgeball, etc. The Hall also hosts cinema screenings, Job Club, the Brass Band, Zumba, Circuits, boxercise and Boot Camp and has started an Under 8’s football class. The facilities within the Hall include a fully equipped Boxing gym, a library with internet access and a public Fitness Suite.
- Floodlit Multi Use Games Area at Pen Afan Primary school – no longer used by the Gwynfi United F.C , PCSO and Youth Services as issues with Caretaking responsibilities in the extended school day.
- Gwynfi bowling green. The Club is developing its junior section.
- Various equipped play areas including Margaret Terrace which is proposed for enhancement.

It can be seen from the above that the area under review is well served by community facilities. There will be some impact upon the Afan Valley Swimming Pool and the Croeserw Community Enterprise Centre through depleted attendance associated with visits which would otherwise have been made by pupils of Cymer Afan Comprehensive School, should the proposal to close the Comprehensive school be pursued.

7. Adverse impact of school closure upon the community

The current extensive range of community facilities and activities based on the school site would be lost if the school was to close on a permanent basis. All existing extended community use of Cymer Afan Comprehensive School would need to transfer to an alternative location under this proposal. It is important to preserve and enhance the onsite extended school provision if it were to be displaced and if the community is to enjoy continued benefit.

The facilities that are at particular risk include the fully equipped Fitness Suite, the dedicated Youth Wing, the Red Field, the centrally located meeting spaces and the future management of the Sports Hall and the floodlit Artificial Turf Pitch , possibly under a new federated management arrangement. Cymer Afan Comprehensive schoolchildren transferring to *Ysgol Newydd Margam* would enjoy state of the art facilities that are planned for in the 21st Century school campus. This would grow the academic and sporting reputation of these pupils.

Anecdotal evidence from consultees points to concern with regard to:-

- The community losing its focus
- 'Education' being the biggest employer in the valley
- Deprivation becoming worse as a result of out- migration and the valley being less attractive for young families to move into
- The future of the remaining four Primary schools being suspect as a new Federation may not be in a position to share staff, IT, buildings, SENCO Coordinator, etc. to the same extent
- The progress and the improved academic achievements made by Cymer Afan Comprehensive schoolchildren under the present arrangements being curtailed or stifled

- Losing the hub of the community where people feel safe, gain advice and are signposted or referred onto other Services.

8. **Plans to mitigate impact if community provision is lost from the school**

Investigations have been carried out to explore possible alternatives for displaced community provision, that which could otherwise be lost as a result of school closure.

An Options Appraisal could be developed which would involve:-

- Negotiations with ‘Llandarcy Park Ltd’ and the ‘NPTC Group’ to relocate the school Fitness Suite to the Afan Valley Swimming Pool. This would involve infilling the Learner Pool to create a separate gym facility which would augment the current pool usage, the recently installed sauna and the Jacuzzi that is being planned for. Initial concept plans have been drawn up following the UAV Sports Facilities Feasibility Study completed by ‘Community Design Gwent’ in May 2009.
- Displacing the Youth Club that is staged on a Tuesday and Friday to the Cymer Afan Primary school Sports Hall. This has the capacity to accommodate the 48 individuals that make use of the Service in 2016/17.
- Transferring management of the Red Field to the Croeserw F.C. If this proved to be uneconomic in the short to medium term the playing field would revert back to nature with the Football Club then concentrating its fixtures on Tudor Field.
- Making new management arrangements for the Cymer Afan Primary School Sports Hall and floodlit Artificial Turf Pitch. Consultees felt there was insufficient administrative support within the Primary schools to undertake this function in the absence of the Comprehensive School and a Business Manager. Initial discussions have been held between ‘Llandarcy Park Ltd’ and the Local Authority with regard to managing the Sports Hall and the Artificial Turf Pitch at arm’s length from the Afan Valley Swimming Pool. This will need to be further explored.
- Displacing community hires such as ‘Slimming World’ to an alternative location such as the Croeserw Community Enterprise Centre.

- Renewing the management capacity of the four remaining federated Primary schools to ensure the continued benefit of shared Leadership, staffing, buildings, IT, facilities and experience is enjoyed.

9. **Opportunities for enhancing existing school and community facilities to receive additional Out of School Hours activity.**

Under the proposal to close Cymer Afan Comprehensive School opportunities exist to enhance the remaining school based and community based activities and facilities.

The Wards of Cymmer, Glyncorrwg and Gwynfi are uniquely placed to benefit from a variety of extra voluntary contributions made available via the Pen y Cymoedd Wind Farm, the Ffynnon Oer Wind Farm and the Llynfi Afan Wind Farm.

The Community amenities and activities provided by the voluntary sector that serve the upper Afan Valley area can benefit from the above sources of grant aid. The existing amenities provided by the Third Sector can be adapted, modernised and enriched by this grant aid in such a way as to receive additional out of school hour's activity. Many of the aforementioned community amenities, including the Afan Valley Swimming Pool, the Glyncorrwg Ponds Co-operative, the Noddfa Community Centre, the Gwynfi Miners Community Hall and the Gwynfi Bowls Club have already taken the initiative and have secured funding from the Wind Farm Community Benefit Funds.

The area also continues to qualify for Big Lottery Funding (as evidenced by the £344,000 contribution made to the running costs of the Afan Valley Swimming Pool) and is deemed sufficiently rural to benefit from the Rural Communities Development Fund (RCDF) and the Leader Fund which is a Welsh Government investment programme intended to combat poverty by promoting growth, economic prosperity and well-being.

10. **Conclusion**

The Community Impact Assessment recognises the importance of the Cymer Afan Comprehensive School and the part it plays in the wider community. Community provision and activities that have been developed over an extended period on the school site will be

displaced under this proposal. Following evaluation, it has been shown that it is essential that community/school interaction is protected and not lost. There are opportunities to relocate community based activity from the school to alternative locations. These locations can be enhanced as appropriate with no loss of amenity to the wider community. It is recommended that plans are put in place to mitigate any loss.

Under this proposal the pupils who would otherwise attend Cymer Afan Comprehensive school are to receive secondary education at *Ysgol Newydd Margam*, an English – medium provision in a 21st Century school setting. The process of completing the Community Impact Assessment has helped to engender a better understanding of how best to mitigate the impact of school reorganisation on a community, which is right and proper. The deciding factor in determining the school organisation proposal should be one of securing the best educational offer for pupils.

Sources/References:-

(1)Interviews:-

- Head, Deputy Head, Business Manager , Chair and Vice Chair of Governors of the federated schools (16.11.17)
- County Councillors for the Wards of Cymmer, Glyncorrwg and Gwynfi (20.11.17)
- Management of the Croeserw Community Enterprise Centre (15.11.17)
- Former Communities First staff of the ‘Upper Afan Forum Ltd’ now working to NSA Afan (27.11.17)
- Manager of the Afan Valley Swimming Pool/ ‘Llandarcy Park Ltd’ (16.11.17)
- Senior Youth and Community Officer, NPTCBC (17.11.17)
- Management of the Gwynfi Miners Community Hall (21.11.17)
- Caretaker of the Noddfa Community Centre, Glyncorrwg (21.11.17)
- Manager of the Glyncorrwg Ponds Co-operative and Visitor Centre (21.11.17).

(2)NPTCBC Local Development Plan (September 2011) identifying all community provision within the spatial area. Also RDP and 'Towards a Valley Strategy' visionary report.

(3)Audit of community provision in the Wards of Cymmer, Glyncorrwg and Gwynfi.

(4)Census data (2011) and NPTCBC Neighbourhood Profile for the Wards of Cymmer, Glyncorrwg and Gwynfi. Communities First - Upper Afan Valley Action Plan.

(5)Welsh Government School Organisation Code: Circular No: 006/2013

(6)Upper Afan Valley Sports Facilities Study- 'Community Design Gwent' May 2009

(7)Scoping Study (16.11.17 & 21.11.17)

Welsh Language Impact Assessment

Strategic School Improvement Programme – future of secondary education in the upper Afan Valley

Context

1. This Welsh language impact assessment¹ has been carried out in line with the requirements of the Welsh Government's School Organisation Code.
2. Implementing the proposal will result in the closure of Cymer Afan Comprehensive School with educational provision being made for the pupils at Ysgol Cwm Brombil which will subsequently provide secondary education for the catchment of the upper Afan Valley.
3. Ysgol Cwm Brombil is set to open in the autumn term 2018 and will provide secondary education for the area currently served by Dyffryn School. It is intended that pupils who would otherwise attend Cymer Afan Comprehensive School will transfer on closure in September 2019 to Ysgol Cwm Brombil.
4. Both Cymer Afan Comprehensive School and Ysgol Cwm Brombil are English-medium schools, as is Dyffryn School.
5. Neither the upper Afan Valley nor the area served by Ysgol Cwm Brombil is an area designated by the Council in its local development plan, as Welsh language sensitive.

The reasons for the proposal

6. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. 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 in order to ensure future provision is sustainable.

¹ First iteration: 31.10.17/rc/rvg. Second iteration – post consultation: 31.05.18/rc/rvg.

7. Secondary education in the upper Afan Valley is provided at Cymer Afan Comprehensive school as part of a federation of five schools, four primary and one secondary.
8. Cymer Afan Comprehensive is by any measure a small secondary school. A school with 600 pupils or fewer is generally regarded as a small secondary school. Currently, Cymer Afan Comprehensive School has 229 pupils on roll.
9. Pupil numbers are not forecasted to increase sufficiently to change its small secondary school status.
10. Cymer Afan Comprehensive school building has significant surplus places. It has capacity for approx. 640 pupils but with 229 pupils on roll it is carrying nearly 64% surplus capacity.
11. In the current financial year², Cymer Afan Comprehensive school receives a budget share equivalent to £6,822 per pupil compared to the average for the Council's secondary sector schools of £4,418, a difference of £2,404 per pupil and approx. 54% above the average. This compares to £7,111³, per pupil during the previous financial year, approx. 60% above the average.
12. Cymer Afan Comprehensive School has backlog maintenance and accessibility costs amounting to c. £3m. The site is assessed as overall condition C, with many of the building and mechanical elements are nearing the end of their life span and will require replacing within the next 2-4 years.
13. There is suitable, alternative English-medium provision available within the County Borough at Ysgol Cwm Brombil, which offers a new build 21st Century school, and at Cefn Saeson Comprehensive School. There is also suitable English-medium provision at Maesteg Comprehensive School.
14. The Council is proposing to make arrangements for pupils from the upper Afan Valley to receive their secondary education at Ysgol Cwm Brombil, a £30m investment by the Council in a new build school with 21st century school facilities.

² School budget share allocation: 2018/2019

³ School budget share allocation: 2017/2018 as reported in the consultation document

15. Teaching and learning opportunities are increased in new build state of the art facilities and an evaluation of a new, 21st century school build in Neath Port Talbot has shown high levels of satisfaction and support from the pupils, their parents and stakeholders.

Welsh language impacts associated with the proposal

16. The Council recognises that language and culture are essential parts of an individual's identity and is committed to promoting and celebrating the Welsh language and culture in a pro-active and inclusive way. The Council's Welsh in Education Strategic Plan (WESP) details how it intends to support and further develop Welsh language education in schools.
17. For children from non-Welsh-speaking backgrounds whose initial and main contact with Welsh is through school, exposure to education through Welsh language provision improves understanding and fluency.
18. Primary education through the medium of Welsh is available at Ysgol Gynradd Gymraeg Rhosafan, the Welsh-medium school serving the catchment area of the upper Afan Valley. Secondary Welsh-medium education will be available at Ysgol Gymraeg Ystalyfera –Bro Dur (Bro Dur campus) which opens in September 2018.
19. Some pupils access Welsh-medium education at Ysgol Gynradd Gymraeg Cynwyd Sant and Ysgol Gyfun Gymraeg Llangynwyd in the neighbouring authority of Bridgend. Home to school transport is provided because of 'nearest suitable' provision.
20. The commitment to the Welsh–medium schools is strong and the proposal should not impact upon the numbers seeking to be educated through the medium of Welsh.

Welsh language provision at Cymer Afan Comprehensive School

21. At Cymer Afan Comprehensive School the Welsh dimension is strongly supported. There are many valuable opportunities

provided to develop pupils' knowledge and understanding of the history, culture and industry of Wales.

22. Estyn report that 'Extra-curricular activities such as an exchange visit to a neighbouring Welsh-medium school and the introduction of the 'Dreigiau' group are positive features in developing pupils' use of Welsh outside of the Welsh classroom.'
23. In Welsh at key stage 3, performance has improved steadily over recent years and compares favourably with that in similar schools.
24. All pupils follow an appropriate course in Welsh in key stage 4, and a majority of pupils gain a qualification in Welsh at GCSE.
25. In a few lessons, other than Welsh, pupils use the language well to ask basic questions.
26. Estyn report that teachers have received valuable support in using Welsh during their lessons and around the school.
27. Ysgol Cwm Brombil is set to open in the autumn term 2018 and will provide secondary English-medium education for the area served by Dyffryn School which will close in 2018. In this regard, although Ysgol Cwm Brombil will be a new school it will serve an established pupil base and will build on the strengths of the school it is replacing, Dyffryn School.
28. Current provision for the Welsh language at Dyffryn School sees almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This was reported by Estyn to be strength of the school, who also noted that the school has been effective in promoting positive attitudes to the learning of Welsh.
29. Estyn also report the following
 - At Dyffryn School pupils' performance in Welsh second language at key stage 3 was better than that in similar schools (2013). At key stage 4 a majority of pupils followed the full-course GCSE Welsh second language and achieved a level 2 qualification (2013). This is well

above the national average. Performance in the short course was close to the national average.

- From 2013, almost all Year 10 pupils follow the full GCSE course in Welsh second language, with many pupils following the course at the higher level. This is a significant strength. With the help of Year 9 pupil 'Welsh ambassadors', the school has been effective in promoting positive attitudes to the learning of Welsh.
30. The school is working towards improving pupils' Welsh language skills beyond formal Welsh lessons, and to encourage greater pupil self-confidence when using the language.

Welsh language impact assessment

31. Against this background and combined with the advantages of a larger pupil cohort where there will be more opportunities to develop Welsh language skills, transfer to Ysgol Cwm Brombil should result in a positive impact on Welsh language development.
32. As such, the Council is satisfied that provision for Welsh language will be at least comparable with the provision currently offered at Cymer Afan Comprehensive School.

This page is intentionally left blank