

FORMAL CONSULTATION REPORT

**Proposal to close Ysgol Llanbedr
Dyffryn Clwyd (Voluntary Controlled,
Church in Wales- Diocese of St. Asaph)
as of the 31st of August 2016 with pupils
transferring to Ysgol Borthyn, Ruthin
subject to parental preference**

OCTOBER 2015

Should you require a copy of this report in hard copy please email modernisingeducation@denbighshire.gov.uk with your name and postal address. Please indicate whether you would like to receive the document in Welsh, English or both.

Table of Contents

Foreword	P.3
Introduction	P.4
Consultation with the Diocese of St. Asaph	P.4-5
Formal Consultation	P.5
Pupil Consultation Arrangements	P.5-6
Responses to the Formal Consultation	P.6
Response from Estyn	P.6-9
Appendix A	P.10-17
Appendix B	P.18
Appendix C	P.19-22
Appendix D	P.23-37
Appendix E	P.38-61
Appendix F	P.62-113
Appendix F (i)	P.114-117
Appendix G	P.118-131
Appendix H	P.132-134

Foreword- Reviewing Our Schools

Denbighshire County Council {DCC} has a responsibility to periodically review our schools to make sure that we are providing the best education for our pupils, so that they can achieve their full potential. We need to review our school provision to ensure;

- *Make sure our education provision is of high quality, and is sustainable in the long term;*
- *Improve the quality of school buildings and facilities;*
- *Provide the right number of school places, of the right type, in the right locations.*

In Denbighshire we are carrying out a series of areas reviews. This means we are looking at groups of schools in areas of the County to see if we can improve the delivery of education in each area. This could include closing or merging schools, or opening new schools. We review schools on an area by area basis to make sure that when we make changes to school organisation, we take into account any potential impact on other schools nearby.

The Ruthin area review of primary educational provision began in 2013. The Ruthin area included 11 schools, challenges facing primary educational provision in the Ruthin area include;

- *Surplus places;*
- *Condition and suitability of school sites and facilities;*
- *Provision of mobile classrooms;*
- *School estate efficiency and sustainability.*

1. Introduction

- 1.1. Denbighshire County Council {DCC} has completed a period of consultation regarding the proposal to close Ysgol Llanbedr DC as of the 31st of August 2016 with existing pupils transferring to Ysgol Borthyn, Ruthin subject to parental preference.
- 1.2. The consultation took place between the 16th of June 2015 and the 28th of July 2015, inclusive. The consultation was undertaken in accordance with the School Organisation Code {'the Code'}. Following a period of formal consultation the Code requires us to publish a formal consultation report. In the report we have to;
 - ❖ Summarise each of the issues raised by consultees;
 - ❖ Respond to these issues by means of clarification, amendment to the proposal or rejection of these concerns, with supporting reasons; and
 - ❖ Set out Estyn's view of the overall merits of the proposal.

2. Consultation with the Diocese of St. Asaph

- 2.1. Where school organisation proposals relate to schools for which land and/or buildings are held on trust, or which have a designated religious character, the proposer must conduct consultation with the trustees and/or appropriate religious body before the consultation document is published. The proposer must then allow 28 days for receipt of comments before any decision is made to proceed to formal consultation.
- 2.2. In February 2015, Denbighshire County Council's Cabinet of elected members agreed to commence a period of consultation with the Diocese of St. Asaph regarding Ysgol Llanbedr DC. This took place between the 20th of April 2015 and the 18th of May 2015, inclusive. A draft consultation document was issued to the Diocese of St. Asaph.
- 2.3. Representatives from both the Diocese of St. Asaph and the Governing Body of Ysgol Llanbedr DC attended a meeting where they proposed an alternative option, namely to federate Ysgol Llanbedr DC with another Church in Wales primary school and to change the legal status from Voluntary Controlled to Voluntary Aided. The Diocese of St. Asaph and the Governing Body requested that the Cabinet report proposing the commencement of a consultation regarding the closure of Ysgol Llanbedr be suspended for further work to be undertaken regarding federation and change of legal status. The written response from the Diocese of St. Asaph and Governing Body of Ysgol Llanbedr is contained within Appendix A of this

report pack. Please note this is not the response to the formal consultation but to the pre-consultation with the appropriate religious body.

- 2.4. It was decided that at the time there was not sufficient evidence to persuade members to suspend the report coming before Cabinet and this would be further deliberated at Cabinet in June 2015. The Diocese of St. Asaph and Governing Body have submitted the alternative proposal as part of their respective responses to the formal consultation.

3. Formal Consultation

- 3.1. DCC Cabinet agreed to commence a period of formal consultation relating to the proposal to close Ysgol Llanbedr DC as of the 31st of August 2016 with existing pupils transferring to Ysgol Borthyn, Ruthin subject to parental preference.
- 3.2. The formal consultation took place from the 16th of June 2015 to the 28th of July 2015 inclusive. The formal consultation document was distributed in hardcopy and electronically to a total of 792 consultees. The full list of recipients can be found in Appendix B of this report pack. A hardcopy of the response form was attached to the consultation pack.
- 3.3. All documentation, including the formal consultation document, community and Welsh language impact assessment, children and young peoples' consultation an electronic version of the response form were published on the Denbighshire County Council website. These documents can be found [here](#).
- 3.4. The Code does not make it mandatory for the authority to facilitate meetings with stakeholders. The authority received no requests for such meetings prior to or during the consultation period. A community meeting was facilitated during the consultation period however this was not arranged by the local authority and no local authority officers were present. A postal and email address was provided within the formal consultation document for consultees should they have any questions regarding the proposal. Some consultees requested clarification on some elements of the proposal.

4. Pupil Consultation Arrangements

- 4.1. A pupil consultation document was produced by the authority specifically for pupils who may be impacted by the proposal so that they could fully engage with the consultation process. The document was provided in hardcopy to Ysgol Llanbedr DC, Ysgol Borthyn, Ysgol Gellifor, Rhos Street School, Ysgol Bro Famau and Ysgol Llanfair DC. The document was available bilingually.

- 4.2. Consultation sessions were arranged for the pupils of Ysgol Llanbedr DC and Ysgol Borthyn as the proposed receiving school. The findings of the pupil consultation sessions and further information relating to arrangements for children and young people can be found in Appendix C of this formal consultation report pack.
- 4.3. As part of the pupil consultation arrangements and age appropriate response form was also provided specifically for pupils. A total of 10 forms were received. The issues and comments submitted by pupils are also contained within Appendix C.

5. Responses to the Formal Consultation

- 5.1. A total of 539 responses were received during the consultation period. 112 responses were letter or emails and a further 427 responses were received via the standard response form. A response from the Diocese of St. Asaph and a response from the Governing Body of Ysgol Llanbedr were also received.
- 5.2. A summary of the issues raised and a response from the authority by type of response is set out with the appendices of this report pack, as follows;
- ❖ Appendix D: Issues raised via letter and email
 - ❖ Appendix E: Issues raised via standard response form
 - ❖ Appendix F: Issues raised by the Diocese of St. Asaph
 - ❖ Appendix F (i): Covering letter from the Diocese of St. Asaph
 - ❖ Appendix G: Issues raised by the Governing Body of Ysgol Llanbedr
 - ❖ Appendix H: Estyns' response

6. Response from Estyn

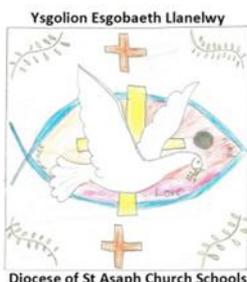
- 6.1. Estyn, in considering the educational aspects of the proposal, concluded that the proposal would at least maintain the current standards of education in the area. Furthermore, Estyn commented that the authority had appropriately considered the impact of the proposal on the quality of pupil outcomes, provision and leadership and management. Estyn stated that the authority had provided a useful range of information relating to performance outcomes including local and national averages and benchmarked data relating to the family of schools.
- 6.2. The Estyn response in full is set out in Appendix H of this formal consultation pack. The table below sets out the key points made by Estyn in their response alongside comment and/or clarification from the authority;

Estyn	Response/Point of Clarification
It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.	Noted. The authority welcomes this view.
The proposer clearly outlines the perceived benefits of the proposal. These include the maintaining of the current standards and quality of education, the reduction of surplus places in the Ruthin area, a more balanced distribution of school funding, improved efficiency and effectiveness of the school estate and improving pupils' access to improved school buildings, facilities and resources.	Noted. The authority welcomes this view.
The proposer clearly stated the perceived disadvantages of the proposal. These include the loss of English medium faith based education in the village of Llanbedr Dyffryn Clwyd. Pupils may be required to travel further to their nearest school and staff may be redeployed or made redundant.	Noted. Clarification: A minority of pupils would be required to travel further to school however this would be within Welsh Government Guidelines for learner travel arrangements. Ysgol Borthyn is currently the nearest suitable school for the majority of pupils currently attending Ysgol Llanbedr. 15 pupils would be eligible for school transport should the proposal be implemented, however 4 of those pupils have home locations closer to Ysgol Borthyn than Ysgol Llanbedr.
The proposer has appropriately considered transport issues including an analysis of costs. Transport to alternative schools will be provided in accordance with Denbighshire county councils transport policy.	Noted. Should the current proposal be implemented the authority would work with individual families regarding transport arrangements.
The proposer has considered alternatives to its proposal. These include maintaining the status quo, federation or amalgamation with another Church in Wales primary school, becoming a voluntary aided school and expansion of the current site and closure. The proposer has demonstrated clearly the advantages and disadvantages	Noted. The Diocese of St. Asaph and the Governing Body of Ysgol Llanbedr have provided a response to the formal consultation regarding the option to federate Ysgol Llanbedr with another Church in Wales primary school and change the legal status from Voluntary Controlled to Voluntary Aided. A full response to the proposed alternative option can be found in appendix 1 of the Cabinet report papers.

<p>of each option and the reasons for the preferred option.</p>	
<p>The proposer has completed a useful Welsh language impact assessment. It concludes that the proposal will be neutral in terms of its impact on the Welsh language. The proposal provides parents with the option for English medium education for their children with Welsh taught as a second language. This is similar to the current position and pupil access. The current proposal provides access and maintains parental preference for language medium.</p>	<p>The impact assessment included outcomes at the end of Key Stage 2 Second Language Welsh assessment for Ysgol Borthyn with 100% of pupils gaining the expected outcomes. There is no data available for 2014 for Ysgol Llanbedr however in 2013 this was 100% and for Ysgol Borthyn in the same year this was 90%. Both were above the local and national average. Should the proposal be implemented pupils of Ysgol Llanbedr would receive an equivalent standard in respect of Welsh language provision.</p> <p>Denbighshire County Council is committed to the Welsh Government's aspiration of delivering 'a sustained increase in both the number and percentage of people able to speak Welsh' and recognise the importance of bilingualism in the 21st century. DCC have adopted a long term aspiration that all children and young people in Denbighshire will leave full time education being competent and confident in using both Welsh and English. Outcome 5 of the Welsh in Education Strategic Plan aims to have 'more learners with higher skills in Welsh' including Welsh second language.</p>
<p>The proposer has adequately considered the impact of the proposal on the quality of pupil outcomes, provision and leadership and management. The proposer has considered the outcomes of the most recent Estyn inspection reports and has provided the support categories and bands of both schools.</p>	<p>Noted.</p>
<p>It {the proposer} has also provided a useful range of information relating to performance outcomes. These include local, national and the family of schools who have similar levels of free school meal entitlement.</p>	<p>Noted, the authority welcomes this view. Contextualised data relating to Ysgol Llanbedr and Ysgol Borthyn (percentiles of ALN and EAL) was also included within the formal consultation document.</p>
<p>The consultation appropriately raises the challenges facing small primary schools in being able to implement leadership structures effectively. The proposer acknowledges that in small primary schools, many head teachers have a significant teaching responsibility. This limits the time they can devote to leading and managing and they</p>	<p>Noted.</p>

<p>have fewer opportunities to evaluate standards and to drive improvement.</p>	
<p>The proposer states reasonably that the preferred proposal would provide stability in leadership and allow Ysgol Borthyn to strengthen its leadership and management team. Ysgol Borthyn has a substantive head teacher and established senior leadership team. Ysgol Llanbedr has an acting head teacher who has been in post since 2013. Since 2009 the school has had three permanent and four acting head teachers.</p>	<p>Noted.</p>
<p>The proposal asserts reasonably that if pupils transfer to Ysgol Borthyn it is likely that pupils will have access to a broader compliment of teaching staff offering expertise in a number of different curriculum areas.</p>	<p>Noted.</p>
<p>The proposer acknowledges that if the current proposal was implemented pupils with additional learning needs will be supported by the councils additional learning needs officer. Any additional learning needs support that pupils currently receive, such as 1-2-1 support, will be replicated in their new learning environment.</p>	<p>Noted.</p>

Appendix A



ESGOBAETH LLANELWY / DIOCESE OF ST ASAPH

Cllr Hugh H Evans OBE
Leader of Denbighshire County Council
County Hall
Wynnstay Road
Ruthin
LL15 1YN

17th May 2015

Dear Hugh

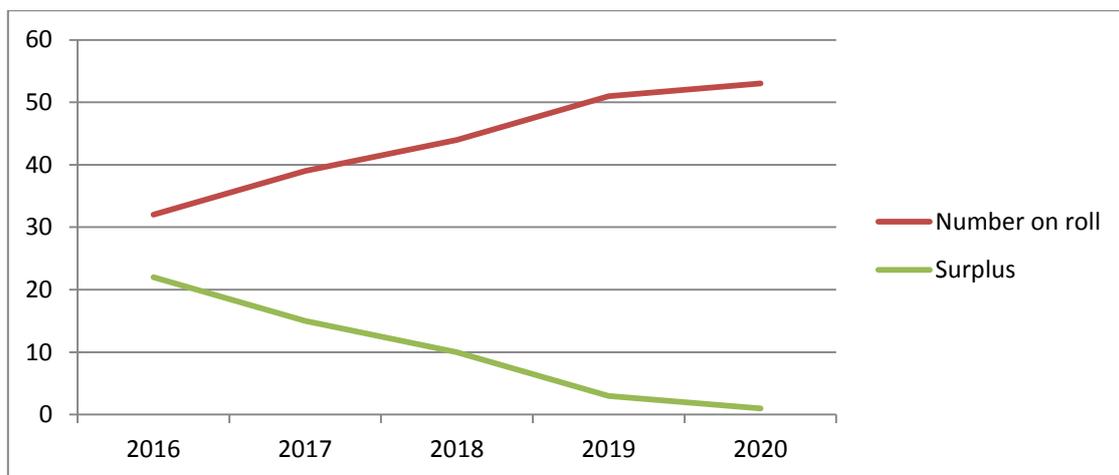
Re: Pre-consultation regarding Ysgol Llanbedr

Thank you again for the opportunity to present our proposals at the pre cabinet meeting on the 11th May 2015 in respect of Ysgol Llanbedr,

The decision of cabinet on the 17th February 2015 was for its officers to commence consultation with the Church in Wales on the proposal to close Ysgol Llanbedr and report back to members. The Modernising Education team sent to the Diocese of St Asaph on the 20th April 2015, a draft formal consultation document and invited the Diocese to consider the draft proposal document and to provide their views on the proposal by Monday 18th May 2015. Officers stated that this would enable the views of the Diocese to be reported to elected members at the Cabinet meeting scheduled for the 2nd June.

Please find below a summary of the proposal and the response of the Diocese of St Asaph to be reported to members at cabinet scheduled for the 2nd June 2015.

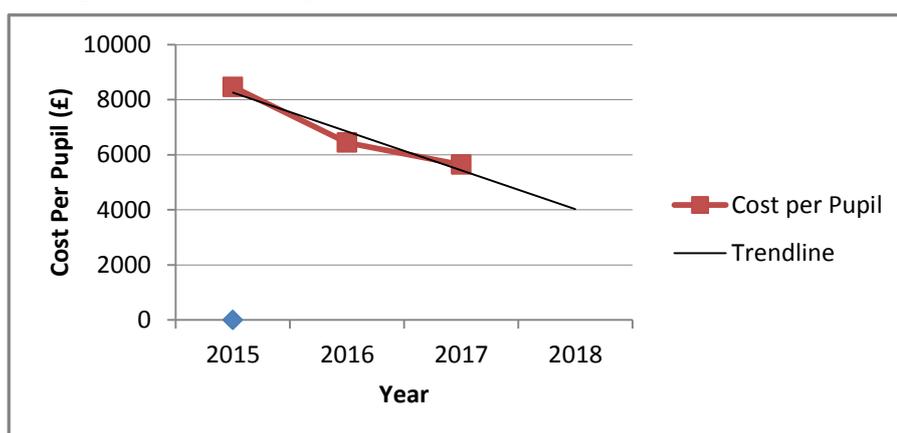
In 2012 surplus places at Llanbedr were high, since then school and Governing Body have worked hard to grow pupil numbers, such that the school is in a position of year on year growth with 5 year pupil projections continuing to show strong increase in pupils. It is the belief of the Diocese and Governing Body that these pupil projection are on the low side based on the information we have about families who would like to move their children to Llanbedr once the future of the school is certain. Also the LDP for Llanbedr has 70 houses which will be built around the corner from the school; we recognise that not all the pupils from these houses would want English medium education however we know that families in Llanbedr whose children have recently started / are just starting school now are choosing Llanbedr again.



Pupil projections based in the school census data from January this year show a net increase of 21 pupils at Llanbedr, with the strongest growth in the next couple of years, and the corresponding reduction in surplus places.

In light of the information the Governing Body has about demand for Llanbedr they have recently had a request approved to increase capacity back to 77, the level at which the school has operated for many years, because the lower number will not support the number of projected admissions.

- ❖ Currently, Llanbedr does incur an above-average cost per pupil.
- ❖ As indicated by projected pupil numbers, incurred costs decrease per pupil as numbers on roll increase.
- ❖ Pupil growth numbers give a more balanced distribution of pupil led funding.



The school and Governing Body at Llanbedr have worked hard to maintain good financial management at the school. During the period of decreasing pupil numbers, the subsequent stabilisation and now the increase in pupils the budget has always been in surplus, however slight. The school has not had to make any redundancies so as pupil numbers grow the school is well placed to continue to deliver good quality of education to the pupils without sudden increases in cost. Therefore the cost per pupil falls significantly over the next 3 years due to the increase in pupils. This brings the Llanbedr cost per pupil much more in line with the Denbighshire average.

- ❖ One of the aims of the Ruthin Review is to reduce surplus places.
- ❖ Denbighshire County Council has already taken steps towards achieving this aim.
- ❖ Current work and other consultations, if carried through, will bring capacity down to the desired target.
- ❖ All projections point to pupil numbers increasing over the next five years. The school has registered interest indicating an increase in number on roll, should its future be secured.

Faith provision

- ❖ We believe that faith-based provision, delivering a high-quality education with a framework and ethos based on Christian values, remains an important part of overall educational provision.
- ❖ Pupil projections for the next five years strongly suggest an increased demand in both schools.
- ❖ Evidence collated after the Minister's decision demonstrates a significant demand for English-medium faith-based education, alongside current pupil projections, this strongly suggests both schools need to remain open.

It is wrong to assume that faith schools are schools intended to educate people of the faith into the faith, this is not so, they provide a Christian school for all people. We are open and transparent in our offer to parents that our ethos is based on a set of values that promotes Christian character and an education that is about service and spirituality as well as academic achievement.

Our data tells us that parents in this area want their children to attend a church school and that there is demand in the system for English medium faith based provision. It would not be cost effective or economic to close one school and then have to create that capacity in another school. This would also not meet the benchmarks required under the 21st Century Schools Programme.

We have evidence from parents who contacted the school after January 27th to request a place for their child. We are happy to submit names which can be validated by officers.

Denbighshire today is very different from the early nineteenth century when the Victorian church built schools in rural villages, when there was no other provider. The demographic has changed and these schools now find themselves serving an altogether different community need.

Parents with no apparent connections to the church or who are not regular worshippers, seek this education for their children, this is because our schools are ingrained with Christian values and have the human flourishing of every child at its core, because we drive a philosophy of education and a pedagogical approach that is underpinned by the rhythm and liturgical life of the community and because we offer pastoral care to all.

The Proposal:

That Ysgol Llanbedr:-

- ❖ Federates with another Church in Wales school.
- ❖ Consults on a proposal to change status to a Voluntary Aided school

We believe that this addresses the issues of reducing surplus places whilst also reducing costs. It also demonstrates our willingness and continued commitment to working with the local authority to achieve these broader policy aims of reducing costs and addressing surplus places, we are both statutory providers of education and the Diocese of St Asaph wants to work cooperatively and supportively with the Local Authority with a shared vision for the planning of school places

Federation

- ❖ Education (Small Schools) (Wales) Order 2014 States:
- ❖ Welsh Government wishes to make federation more common place, especially amongst small schools
- ❖ Federation can provide an opportunity for schools to remain open in their communities and to share good practice, resources and facilities to improve school performance and pupil attainment.
- ❖ federating small schools is likely to result in some cost savings for local authorities
- ❖ Evidence from schools that have federated show there are clear advantages and savings that can be achieved

The Education (Small Schools) (Wales) Order defines a small school as that with fewer than 91 pupils

The explanatory memorandum to the order states:

Federation provides an opportunity for smaller schools to remain open in their communities and to take advantage of the benefits federation can offer in terms of sharing expertise, good practice and resources for the benefit of all schools in the federation.

Evidence suggests that federation can be beneficial in terms of improving the quality and range of educational provision and can make schools more efficient financially.

The Welsh Government wishes to make federation more common place, especially amongst small schools. Education (Small Schools) (Wales) Order 2014, therefore included provision which allows the Welsh Ministers to make regulations which make it easier for a local authority to propose federation of schools. This order was enacted on the 29th April 2014 so was not an option for the Authority at earlier stages of the consultation with regard to Ysgol Llanbedr, but now is a worthy and available mechanism to retain provision whilst meeting your objectives of cost savings and reducing surplus places.

Federation can provide an opportunity for schools to remain open in their communities and to share good practice, resources, and facilities to improve school performance and pupil attainment. The ultimate aim of federations should be to improve educational outcomes of pupils. However, federating small schools is likely to result in some cost savings for local authorities

Small schools that are federated should also benefit from potential cost savings as the federation beds down. Evidence from schools that have federated show there are clear advantages and savings that can be achieved

Annex 9 of the UK Department for Children, Schools and Families Report (now the Department for Education) issued in September 2009 evidences some of the financial savings from the case studies of small rural primary schools federating. Based on shared headships at that time the estimated savings on head teachers' salaries ranged from a net minimum of £12,000 - £54,530 depending on variables such as the pay point and salary scale of the heads, the position will be even more beneficial 6 years later

Schools can improve value for money by working more closely with each other. In our research delivered benefits included sharing and sharing leadership and other staff resources. (Ref: Valuable lessons guide – improving economy & efficiency in schools)

There are considerable and wide-ranging advantages to federating for both schools and school leaders. The option to federate could provide a positive option to schools facing longstanding head teacher recruitment issues, reasons that seem particularly pertinent to small and rural schools. (Ref: Hard Federations of small primary schools)

From a local authority perspective, federations offer a positive alternative to school closure, an incentive for retaining heads and an opportunity to improve standards. (Ref: Hard Federations of small primary schools)

School governing body federation can be beneficial in terms of improving the quality and range of provision and that it can also make schools more efficient financially. (Ref Explanatory Memorandum to the proposed Education (Wales) Measure 2011)

Mrs Alison Heale is the head teacher of three federated schools in the Wrexham area, she comments on her experiences:

- ❖ *The Federation has enabled us to offer the advantages of a small school and a caring and supportive 'family type' environment whilst also offering the benefits of working together as a larger school community.*
- ❖ *Staff working in partnership has developed and nurtured staff leadership skills, sharing of best practice, mentoring of colleagues and a focus on continuity and consistency within and between schools*
- ❖ *Standards continue to improve as a result of consistent assessment procedures, a common marking and feedback policy and many opportunities for the children to work collaboratively..*
- ❖ *As a Federation we are building curriculum teams which again allow for the sharing of expertise and skills. Staff who have historically worked in isolation because they are the only teacher for a vertically grouped class are now able to plan, share ideas and reflect together. This is improving our teaching and learning.*
- ❖ *As a Federation one of our schools was inspected in July last year. Staff in other two schools did all they could to support and encourage the staff going through inspection. this is a great example of Federation working well- to the benefit of all our pupils.*
- ❖ *Numbers in our three schools have been sustained and indeed increased*

Initial discussions within our family of Church schools indicate a number of willing and potential federation partners. Subject to the mandate from cabinet, The Diocese will proceed to formal negotiations and inform the council when a preferred federation partner is selected.

Change the status of Ysgol Llanbedr to Voluntary Aided

What will happen if a school becomes Voluntary Aided?

- ❖ All capital works under the Capital Grants Scheme become the responsibility of the Governing Body and Diocese which is a cost saving to Denbighshire County Council
- ❖ Greater involvement of the Diocese in the management and operation of the school (reducing commitment from Denbighshire County Council)
- ❖ Governing Body are the Admissions Authority – cost saving to DCC
- ❖ Governing Body are the employers of the teaching staff – cost saving to Denbighshire County Council

- ❖ Better distribution of faith schools by type in Denbighshire (currently only one other Church in Wales VA School)
- ❖ Our commitment to working with the local authority to achieve its broader policy aims of reducing costs and addressing surplus places is further supported by our desire to change the status of the school to Voluntary Aided.
- ❖ Cost of capital projects is offset – deficiencies in school accommodation highlighted in the consultation reports can be addressed at no cost to the Authority. (School hall, upgrade of facilities).
- ❖ Greater school improvement advice from the Diocesan team meaning less responsibility to officers, the management of the school is the responsibility of the Governors with support from the Diocese.
- ❖ Admissions process is administered wholly by the school, parents apply to the school not the authority, the Governing body determine admissions, and inform parents, and appeals are the responsibility of the Diocese. Welsh Government and the Diocese advise and manage the process.
- ❖ As employers the Governing Body undertake recruitment and selection of the Headteacher and teaching staff. The Local authority saves money by not having to support these HR functions
- ❖ The Voluntary Aided School has responsibility for its own RE, using the Church in Wales syllabus rather than the agreed syllabus. This means that support relating to RE and Collective worship is provided by the Diocese and not the Local Authority. This extends across the curriculum for example we have our own resources for the LNF in VA schools and there is specific additional support for the section 50 inspection framework.
- ❖ There is need for schools to form effective structural partnerships and collaborations if they are to survive into the future. The need to offer a broad educational experience, whilst facing the challenge of sustaining experienced leadership under increasing financial pressure is a challenge. It is only as our schools work more intentionally in structural collaborations that they will find the strength and resilience they need to continue to offer an outstanding education in the heart of local rural communities
- ❖ Church schools seek to be highly effective educationally, and they achieve that by not simply aiming to produce outstanding test and exam results or by striving just to be rated good or excellent by ESTYN, but by aiming for every child and young person to have a life enhancing encounter with the person of Jesus Christ and the Christian faith. Through that daily encounter and a focus on spiritual development and the formation of character, our schools seek to enable pupils to show integrity, courage, trustworthiness, emotional intelligence and to be passionate about justice.

In conclusion, the Diocese of St Asaph invites cabinet to:

- ❖ Suspend the proposed consultation to close Ysgol Llanbedr

- ❖ The St Asaph Diocesan Board of Statutory Education secure a federation partner for Ysgol Llanbedr and commence the consultation to change status from Voluntary Controlled to Voluntary Aided
- ❖ The proposal is reviewed in May 2018 and if we have not achieved a successful federation, changed status and reduced surplus places to within 10% of extended capacity, the Diocese will work with the Authority to commence further consultation on closure

The timescales for this are potentially:

Consultation process to change status: 13 weeks

Consultation process for federation is 100 days if both schools have fewer than 91 pupils, 125 days if one school is bigger.

If this proposal is approved prior to summer holiday and then the changes could be made by the end of the financial year, or within 12 months of starting the process.

We hope that this alternative proposal demonstrates the commitment of the Diocese and the Governing Body to work with Denbighshire County Council to secure the future of provision at Ysgol Llanbedr and our willingness and continued commitment to achieve this by addressing the councils broader policy aims of reducing costs and addressing surplus places.

If there is any further information that we can provide that will assist cabinet in their decision making we would be happy to provide this.

Yours sincerely



R.S. Williams

Rosalind Williams
Director of Education and Lifelong Learning
Diocese of St Asaph

enc: Explanatory Memorandum to the Education (Small Schools) (Wales) Order 2014

END

=====

Appendix B

Stakeholder	Number of Recipients
Parents of pupils of Ysgol Llanbedr DC	26
Parents of pupils of Ysgol Borthyn	105
Parents of pupils of Ysgol Gellifor	64
Parents of pupils of Rhos Street School	117
Parents of pupils of Ysgol Bro Famau	66
Parents of pupils of Ysgol Llanfair DC	76
Teachers and support staff at Ysgol Llanbedr DC	10
Teachers and support staff at Ysgol Borthyn	30
Teachers and support staff at Ysgol Gellifor	15
Teachers and support staff at Rhos Street School	30
Teachers and support staff at Ysgol Bro Famau	15
Teachers and support staff at Ysgol Llanfair DC	17
The Governing Bodies of Ysgol Llanbedr DC, Ysgol Borthyn, Ysgol Gellifor, Rhos Street School, Ysgol Bro Famau and Ysgol Llanfair DC	6
The School Councils of Ysgol Llanbedr DC, Ysgol Borthyn, Ysgol Gellifor, Rhos Street School, Ysgol Bro Famau and Ysgol Llanfair DC	6
The Diocese of St Asaph	1
The Roman Catholic Diocese of Wrexham	1
Head teachers and Chairs of Governors of all Denbighshire Schools (Primary, Secondary & Special Schools)	112
Denbighshire County Council Councillors	47
Llanbedr DC Community Council	1
Ruthin Town Council	1
Llanelidan Community Council	1
Llanfair DC Community Council	1
Regional and Constituency Assembly Members	7
Members of Parliament	3
The Welsh Ministers	3
Estyn	1
North Wales Regional School Effectiveness and Improvement Service (GWE)	1
Independent nursery and childcare providers in the area	8
All relevant teaching and support staff trade unions	7
Flintshire County Council	1
Conwy County Council	1
Wrexham County Council	1
Powys County Council	1

Gwynedd County Council	1
Taith	6
North Wales Police and Crime Commissioner	1
Denbighshire Children and Young People's Partnership and the Early Years Development and Childcare Partnership & SEN Co-ordinator	2
Communities First Partnership	n/a
Total	792

=====

Appendix C

Pupil Consultation Report

1. Introduction

- 1.1. The School Organisation Code requires Denbighshire County Council {DCC} to facilitate consultation sessions with pupils in the schools affected by the proposals. DCC issued a children and young peoples' version of the consultation document, this was distributed in hardcopy to the schools affected by the proposal and also those identified as possible alternatives within the consultation document. The link to the electronic version was also sent to these schools including Ysgol Gellifor, Rhos Street School, Ysgol Bro Famau, Ysgol Rhewl and Ysgol Llanfair DC. The School Council for each school was invited to comment on the proposal however no responses were received.
- 1.2. The Governing Body of Ysgol Llanbedr approached the authority regarding elements of the wording within the document. Minor changes were made at the request of the Governing Body, however this did not impact on the context of the document. The amended version was provided to Ysgol Llanbedr and responses were received from pupils. Other schools and Governing Bodies did not raise any concerns regarding the document.

2. Pupil Consultation Sessions

- 2.1. DCC and the Governing Bodies of Ysgol Llanbedr DC and Ysgol Borthyn facilitated consultation sessions for the pupils at each school. The sessions were led by an education officer who has experience of consulting with children and young people. The sessions aimed to be as interactive as possible.
- 2.2. The sessions began with an explanation of the context and reason for the sessions and why they were being asked for their views on the proposal.

- 2.3. Pupils took part in a 'Hopes and Fears' activity where pupils are asked to write down anonymously what they liked about their school ('hopes') or things they were concerned about ('fears') in relation to the proposal. The findings of this activity are set out below; (next page)

Ysgol Llanbedr 13-Jul-2015	
Hopes	Fears
<ul style="list-style-type: none"> ▪ The school would stay open so I can stay with my friends. ▪ I would like nice teachers like the ones in my school. ▪ To have dark jumpers. ▪ That the school doesn't close because our school could be a big school and nobody wants to go to a school that might be closing. ▪ That we have more children to come to the school. ▪ The council to stop. 	<ul style="list-style-type: none"> ▪ I don't want blue or red or colourful jumpers. I would like to have my own clothes to wear every day. ▪ My amazing school is going to close. ▪ I'm going to leave my teachers. ▪ I don't want to go to a new school. ▪ I don't know anybody in Ysgol Borthyn. ▪ None of my friends will be in my new school.

Ysgol Borthyn 15-Jul-15	
Hopes	Fears
<ul style="list-style-type: none"> ▪ New people to play with; ▪ More money for charities; ▪ More teachers; ▪ New friends; ▪ Choices of dinners; ▪ Bigger school; ▪ Bigger staffroom; ▪ More classes; ▪ The school will be better. 	<ul style="list-style-type: none"> ▪ Bigger chance of bullying; ▪ Longer school dinner queues; ▪ School will be overcrowded; ▪ Need money to make school bigger; ▪ Making new friends; ▪ More teachers; ▪ New buildings;

- 2.4. Pupils then took part in a mapping out activity to build on the first activity. This activity was based around four questions;
- *What needs to be improved at the moment?*
 - *What works well at the moment?*
 - *What would you like to see in a new/alternative school?*
 - *Is there a need to change things at all?*

- 2.5. The findings from the activity are set out in the tables below;

Ysgol Llanbedr 13-Jul-15
What we like about our school
Tennis club; Values for life; Adventure playground; Army club; Astro turf to play games; Christian club; Spellings; Friends; Football after school; Beautiful wildlife in the garden; School trips; Jumpers; School council; Like the rabbits; Music; Special events; Breakfast club; Cartoon club; Holiday club; Racing cars in the morning; Best friends; Rounders' in PE; It's good to be green; School projects; Meet new friends; Book club and opportunity to be a librarian; Playing games; Like the school dinners; Red cards
What we would like to see in our school
More people to come to the school; Have afternoon playtime; Like the people; A big field and more places to go; Can't find more friends; More animals; Don't want to go to a bigger school

Ysgol Borthyn 15-Jul-15
What we like about our school
Playtime; Proms; Golden time; Books; Sports day; Games; Friends; Nice teachers; Films; Work; White boards; Food; Panto; PE; Lessons; Own clothes day; English; Gymnastics; Start chart; Laptops and iPads; Prizes; Cake day; Goal posts; Dinner time
What would we like to see in our school
Fun playtime; More DVDs; Stitched footballs; Monkey bars; More work; More PE; Bigger school; Better dinners; More laptops; More iPads; Later school starts; More choice of food; More golden time; Fun lessons; Less lessons; School mascot; Trampoline; Bring games/toys in; More after school clubs; More helpers; More options in PE; Better books; Park; More free time; Swings; Go to dinner early; Earlier home time; More games on iPads; More stars; Climbing frame; Swimming pool

3. Response Form

- 3.1. 10 responses were received via the pupil response form, all responses were pupils of Ysgol Llanbedr. A summary of the responses are set out in the table below;

How do you feel about Ysgol Llanbedr possibly closing and moving to Ysgol Borthyn, or another school?
<ul style="list-style-type: none"> ▪ Angry- I'd miss my friends and teachers. It wouldn't be the same. ▪ Sad, upset- it would be different. ▪ Sad- I would not like it. ▪ Upset and angry. I don't want to go to a new school. Llanbedr is a village not a town so it is not the same. ▪ Angry, sad, worried, annoyed. ▪ I would feel sad 'cos this is my favourite school. I don't want it to come I just want more people to come here and I like my uniform. ▪ Makes me feel sad. I love the country not in the town they haven't got munchkins so I can't play with them. ▪ Very sad because I do not want to go to any other school and it is silly to close because the school is getting bigger.

Is there anything else you would like to see happen instead of what we are planning?

- I would like Ysgol Llanbedr to stay open forever and day.
- Don't close this school because I will miss the school.
- Not close the school.
- Give Ysgol Llanbedr more time and cancel it because nobody wants to go to a school that might close and Ysgol Llanbedr will be a bigger school.
- It's not a very good idea.
- Keep our school open!!
- To not close the school and let it grow.

Would you like to say anything else?

- We've got a lovely school. Holiday club in Munchkins. The little ones come to munchkins when they are 2 and we help look after them at playtime then they come to school when they are bigger. This is the best school ever.
- I would miss all my friends. I like my school in the village. I don't want to be in the town it is not the same.
- We have a village and people like to help out and come to our services and join in events that we do and lots of schools use our munchkins.
- This morning I actually felt sad about my school might be closing.
- I love our school and teachers!!!
- Don't close my school because I want to keep it forever so I can better at doing maths 'cos I know my sounds. I can ride on my bike to school and walk home up the big big hill.
- I don't want you to close it down because I can ride my bike to school and I can run through the fields to school. I would not like to go to school in the town because we have a big field and a big astro turf. I love my little school and all my friends. They might not go to the same school as me and I would be very sad. My teachers help me a lot and they wouldn't be at another school. So please don't close our school.

4. Pupil Formal Consultation Report

- 4.1. The finding of the pupil consultation sessions have also been produced in a format that is accessible for children and young people. This is available [here](#).

END

=====

Appendix D

Issues Raised via Letter and Email

1. Educational Standards and Provision at Ysgol Llanbedr

Ysgol Llanbedr has high educational standards which consistently outperform the Denbighshire and Wales average; Ysgol Llanbedr consistently provides excellent/exceptional education for pupils. High performing. Children (Ysgol Llanbedr) enjoy an exceptional range of activities including swimming and indoor PE working in partnership with Ysgol Brynhyfryd. Ysgol Llanbedr is the only English medium, rural faith school in the Ruthin area

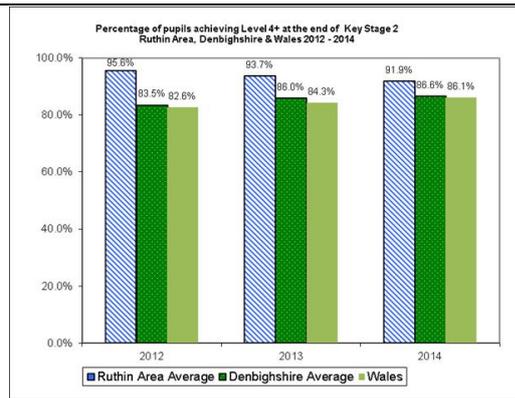
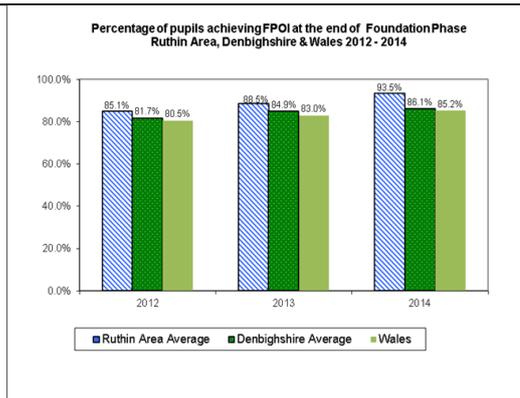
Response

Many respondents have outlined the current provision at Ysgol Llanbedr, specifically in terms of educational provision such as;

- Small class sizes;
- Provides an excellent education;
- Dedicated staff;
- Wonderful environment- indoor and outdoor;
- Provides a family community environment.

Estyn, in their response to the formal consultation, concluded that should the proposal be implemented the standards of education within the area would at least be maintained. It is the view of the authority that should the proposal be implemented and pupils transfer to Ysgol Borthyn, or another of the identified alternative provision, they would have access to at least an equivalent standard of provision.

Educational outcomes and attainment across the Ruthin area is good as a whole. The tables below display the Ruthin area average for both the Foundation Phase and Key Stage 2 (this information was also contained within the formal consultation document);



The tables below displays the outcomes at the end of the Foundation Phase and Key Stage 2 in all schools identified in the consultation document, this includes the outcomes for the 2014/2015 academic year;

Foundation Phase- Outcome 5 and above						
	2010	2011	2012	2013	2014	2015
Llanbedr	85.7%	87.5%	100%	83.3%	100%	100%
Borthyn	82.4%	77.3%	58.8%	53.8%	100%	70%
Rhos Street	88.9%	90%	95.2%	100%	100%	100%
Gellifor	100%	94.7%	100%	100%	93.3%	75%
Bro Famau	100%	90%	81.8%	90.9%	80%	100%
Rhewl	100%	100%	66.7%	83.3%	85.7%	70%
Llanfair DC	94.1%	86.7%	100%	100%	92.3%	100%
D'shire Av.	82.4%	79.8%	86.4%	84.9%	86.1%	86.4%
Wales Av.	81.6%	82.7%	80.5%	83%	85.2%	86.8%

Key Stage 2 Level 4+						
	2010	2011	2012	2013	2014	2015
Llanbedr	84.6%	100%	85.7%	100%	n/a	n/a*
Borthyn	58.8%	78.6%	92.3%	93.3%	80%	83.3%
Rhos Street	93.5%	93.3%	96.6%	92.6%	100%	100%
Gellifor	92.9%	92.3%	100%	91.7%	100%	100%
Bro Famau	91.7%	100%	94.4%	95.8%	100%	100%
Rhewl	100%	100%	100%	100%	75%	90.9%
Llanfair DC	88.9%	91.7%	100%	94.1%	93.3%	100%

D'shire Av.	78.1%	82.3%	83.5%	86%	86.6%	87.9%
Wales Av.	77%	80%	82.6%	84.3%	86.1%	87.7%

**Data has been omitted as it is potentially disclosive*

During the formal consultation period the outcomes for the 2014/2015 academic year were not available. The tables below provide contextualised data regarding the assessed cohort for both Ysgol Llanbedr and Ysgol Borthyn for the 2015 academic year;

Contextualised Data Foundation Phase Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	0	1	0	7
Borthyn	6	1	2	10

**Total includes pupils in cohort who are not ALN/FSM/EAL*

Although in 2015 the outcomes at Ysgol Borthyn for the Foundation Phase were below the local and national average, 60% of the cohort were pupils with Additional Learning Needs, including 2 pupils who are statemented. A further 20% of the cohort were pupils with English as an Additional Language (EAL). In summary, 80% of the cohort were pupils with ALN or EAL. No pupils at Ysgol Llanbedr had Additional Learning Needs and no pupils were EAL. The Free School Meals % at both schools for the assessed cohorts were similar.

Contextualised Data Key Stage 2 Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	n/a**	n/a	n/a	n/a
Borthyn	9	2	5	24

**Total includes pupils in cohort who are not ALN/FSM/EAL*

***Data has been omitted as it has potential to be disclosive. Data has been provided to decision makers.*

Ysgol Borthyn saw an improvement in attainment at Key Stage 2 from the last academic year although this was not above the local or national average. There were a total of 24 pupils in the assessed cohort, 9 of these pupils had Additional Learning Needs equating to 37.5% of the overall cohort with a further 5 pupils having English as an Additional Language (EAL) equating to 20.8% of the overall cohort. Of the total cohort 8.3% were FSM. The cohort in Ysgol Llanbedr was small; the data relating to the cohort is potentially disclosive. The data has been made available to decision makers.

2. Facilities and Accommodation

Wonderful environment- indoor and outdoor- incredible space to run and play; excellent facilities; School is situated in rural environment; yet to find a more idyllic school than Ysgol Llanbedr; beautiful school; rural location; Future expansion and development of school site

This is noted however equivalent school facilities are available at the proposed alternative school, Ysgol Borthyn. Estyn commented that the school offered "a good range of resources, including ICT, provides an appropriate range of learning opportunities for all pupils. The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well." Should the proposal be implemented pupils of Ysgol Llanbedr would have access to at least equivalent standard of facilities and resources.

With regard to school organisation proposals the Code requires that any alternate provision offers the same language and faith offer as the pupils currently receive. There is no requirement for the authority to provide an offer in a rural or town setting. The authority notes the views of consultees that the Ysgol Llanbedr site could be expanded, however an expansion of the school would lead to an increase in surplus places and would require significant capital investment.

3. Alternative Provision

Ysgol Borthyn does not have enough capacity to accommodate the growing numbers of pupils from Ysgol Llanbedr; plan to transfer pupils to Ysgol Borthyn not practical; Borthyn will be at full capacity. Ysgol Borthyn uses mobile classrooms. Ysgol Borthyn is situated on a main road; no off road parking or drop off/pick up. Clear demand for English medium faith based education in the Ruthin area based on pupil numbers and projections. If Ysgol Borthyn closes alternative school needs to provide equivalent or better education for pupils Ysgol Llanbedr delivers education in a rural area, Ysgol Borthyn is in the town- not equivalent; Llanbedr is excellent/very good to Borthyn which is only classed as adequate; not another faith school with achievement level of Ysgol Llanbedr; Closure of Ysgol Llanbedr would contradict policy which entitles pupils to equivalent or better educational experience- Borthyn under performed (and most other local schools) at both foundation phase and key stage 2 2009-2014, inferior site, temporary classrooms and over full class sizes, unsuitable on all levels as an alternative facility- no provision for pick up/drop off, concrete everywhere, limited green spaces, poor facilities for outdoor sporting pursuits, mobile classroom, poor educational standards and results. Children at Ysgol Llanbedr not used to large class sizes. All other schools shoe horned into unsuitable spaces with no room for expansion

Education Provision

It is the view of the authority that Ysgol Borthyn provides at least an equivalent educational provision. Estyn also support the view that standards of education would at least be maintained in the area should the current proposal be implemented. A detailed response to educational outcomes and standards can be found in section 1 of this table which includes information relating to the 2014/2015 academic year.

Assessed cohorts at Ysgol Llanbedr are relatively small and data should be treated with caution. Contextualised data for outcomes at both the foundation phase and key stage 2 were provided in the formal consultation document. Ysgol Borthyn overall has a higher than average number of pupils with ALN and FSM is above both the local and national average. Ysgol Borthyn also has a number of pupils who have English as an additional language. It is the view of the authority that pupils would receive the same standard of education should the current proposal be implemented.

In the view of the authority the school has made strong progress toward meeting the

recommendations set out by Estyn in 2014. The school has been supported by the local authority and the regional educational consortia GWE. A comprehensive action plan based on the recommendations has been implemented and the school are making strong progress with its implementation. A permanent head teacher took up post in January 2015 following the retirement of the previous head in July 2014. As a consequence of the adequate judgement the school received a monitoring visit from Estyn in June 2015. The purpose of the visit is to assess the progress made by the school against the Estyn recommendations made in 2014. Estyn found the school had made sufficient progress and the school was removed from Estyn monitoring.

Pupil Numbers, Capacity & Impact on Faith Provision

Ysgol Borthyn currently has 116 full time pupils on roll (September 2015) equating to 26 surplus places. Within the capacity assessment for Ysgol Borthyn there is scope for a further 23 full time pupils to be accommodated at the school by the potential use of resource area. Historically, Ysgol Borthyn has accommodated more than the current capacity of 142 although pupil numbers have declined and remained static for a number of years. This area has previously been used for teaching purposes. The table below displays the class structures at both Ysgol Llanbedr and Ysgol Borthyn as of September 2015;

	N	R	Y1	Y2	Y3	Y4	Y5	Y6
Llanbedr	4	10	7	3	7	2	3	0
Borthyn	14	18	22	19	11	13	16	17
Totals	18	28	29	22	18	15	19	17

The total number of full time pupils would be 148 full time pupils; numbers at Ysgol Borthyn have historically been higher than this in the past. The authority recognises the importance of faith based education, there is sufficient capacity within the area to meet demand for English medium faith based provision. Should all proposal as part of the Ruthin area review be adopted there would be a mix of rural, town, language and faith based provision which would maintain parental choice. For the majority of pupils Ysgol Borthyn would be closer to their home locations. There is no statutory requirement for the authority to provide education in either a town or rural setting.

Additionally there are further 23 full time faith based surplus places at Ysgol Llanfair DC. Other possible alternative schools in the area have a total of 133 surplus places this includes Rhos Street School, Ysgol Gellifor, Ysgol Bro Famau and Ysgol Rhewl.

Small Class Sizes

The authority recognise that parents may choose smaller schools as however this does not necessarily correlate to smaller class sizes due to the restrictions placed on the staffing body by school funding arrangements. Currently pupils of Ysgol Llanbedr are taught within two class settings within their appropriate key stage.

Mobile Classrooms

Ysgol Borthyn has a mobile classroom on site which is used for teaching purposes. The authority would note that Ysgol Llanbedr also has a mobile classroom located on site which has also been used for teaching purposes but is now utilised by 'Munchkins@Llanbedr'.

Highway Considerations

Ysgol Borthyn is not located on hazardous route. There is a pelican crossing located on the road approaching the school and a school crossing patrol is in place to assist pupils and parents both in the mornings and afternoons. School transport vehicles disembark at the adjoining housing estate which has a rear access to the school. Currently only one pupil at Ysgol Borthyn receives home to school transport.

Quality of Accommodation and Facilities

Consultees have raised concerns regarding the facilities, specifically outdoor facilities, at Ysgol Borthyn in comparison to those available at Ysgol Llanbedr. The authority has produced evidence relating to condition and suitability surveys at Ysgol Borthyn which indicate the school provides a good learning environment and the school had an overall suitability rating of A.

Pupils at Ysgol Borthyn have access to large playing field which is located to the rear of the school. Estyn found the learning environment at Ysgol Borthyn to be good stating "The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well."

One of the key drivers for the Ruthin review was the condition and suitability of school buildings and facilities. The authority recognises that some school buildings and sites within the area are not fit for propose or reflective of a 21st century schools standard. As a consequence of the review £15million will be invested in the school estate which will result in a significant improvement to the learning environment and school estate.

4. Impact on the Community

Ysgol Llanbedr is an important part of the social fabric of the local community and closure would have a devastating impact on Llanbedr; to close would be to detriment of community; paramount importance to keep this school open within our community; by closing Llanbedr you are braking a tight knit community that is focused around the village school. Ysgol Llanbedr has served the village of Llanbedr for 150 years. Vendetta against community. Rural families should continue to be able to have their children educated in rural village schools; Children take part in many activities at the village hall, the church and village events- without Ysgol Llanbedr these events would suffer; difficult to sustain these events. Having village hall not the same as having a school, deprive the school; Concerns about what would happen to astro turf facility if the school were to close and who would be responsible for its management and how it would be funded; highly valued facility for community use; Older members of the community support the school.

The authority acknowledges that school closure will inevitably impact upon a community. The authority produced a Community and Welsh Language Impact Assessment which was published alongside the formal consultation document. It is recognised by the authority that the school plays an important role in the community, should the proposal be implemented there would be scope to extend links with Ysgol Borthyn and the Llanbedr DC community.

There is a separate village hall located within Llanbedr which is utilised for events in the village. The school does not have a hall facility however the astro-turf pitch is used by the wider community. The authority would be open to working with the Diocese and local community to retain use of the facility for the local community. The authority has provided a response to the issues raised within the community impact assessment in section two of this table.

As a consequence of the review the authority has maintained a mix of provision to ensure parental preference including rural, town, faith and language provision within the Ruthin area.

In other instances where school buildings and sites have been subject to a reverter under Charity Commission Law, Denbighshire have worked with third parties, such as the Church in Wales Diocese to seek to retain the use of the building for the community, for example in Bryneglwys following the closure of the site and establishment of Ysgol Dyffryn Ial on one site. Should the proposal be implemented the Council would facilitate discussions with the local community and the Diocese of St Asaph should they wish to seek to retain all or part of the building and/or site for community use.

Should the current proposal be implemented there would be scope for links to be fostered between Ysgol Borthyn and the local community in Ysgol Llanbedr DC. The authority is willing to work with the Diocese of St. Asaph and the Governing Body and wider school community of Ysgol Borthyn to assist in creating strong links between the two communities.

5. Wrap-around-care

Ysgol Llanbedr provides wrap-around-care for working families with pre and after school clubs; essential for working parents; importance of this service to people within our community , allows parents to get back to work and studies thus contributing to local economy; Ysgol Llanbedr provides wrap-around-care for working families with pre and after school clubs; Ysgol Llanbedr provides full wrap around care, breakfast club, afterschool and holiday club- no equivalent care at Ysgol Borthyn; Ysgol Llanbedr provides wrap-around-care for working families with pre and after school clubs. Munchkins at Llanbedr could not continue without the school remaining open; not viable as a standalone private day care facility. Munchkins employs local people, staff would lose their incomes if school closed. Holiday club accessed by children at other schools in the area. Should munchkins close it would have financial impact on families. Village hall not alternative for Munchkins as it is open to the public for use of toilet facilities, car parking and for group bookings.

The Denbighshire County Council childcare sufficiency report (2014) noted that there were a total of 354 childcare places available in the Ruthin area. There were 258 children of 0-3 years of age in 2014 with 50% of childcare vacancies empty for this age range not taking into account 118 spaces within full day care private provision. The full day care provision in Ruthin has a daily capacity of 57% of the numbers it could cater for suggesting that there is more than adequate childcare options and places available within the area. Other full day child care is available in the Ruthin area. The report can be found [here](#).

The authority notes concerns of consultees that 'munchkins' may not be viable without the school remaining open. It has been proposed that the village hall would be suitable however consultees have stated that this would not be an option as the village hall is well utilised throughout the day and could not accommodate the facility due to the toilet facilities and car park being used by members of the community or visitors to the area.

Other schools in the area provide wrap-around-care, including the proposed receiving school Ysgol Borthyn. Ysgol Borthyn offers 'Borthyn Bunnies' playgroup for pupils aged two and a half years and over for morning and afternoon sessions. Other schools within the area also offer similar wrap-around-care provision, breakfast clubs and after school clubs. There is also a significant surplus of childcare places within the Ruthin area (English medium). Although the authority recognises the importance to parents of wrap-around-care it is important to note that this is not a statutory

provision.

6. Pupil Numbers and Surplus Places

Llanbedr on road to recovery with projected pupil numbers more than enough to resolve current surplus; school is growing and seen as desirable for many families; to close Ysgol Llanbedr on the basis of temporary excess of school places seems short-sighted. Pupil numbers and registrations for the school have increased steadily, school is predicted to reach full capacity by September 2016. Pupil numbers are low primarily due to threat of closure by Council. Inaccuracy in projections for Llanbedr. Increasing birth rate/LPD. Council has already met initial surplus places target. Understanding that WG funding for new schools in Ruthin is conditional of LEA reducing surplus places.

The authority has acknowledged there will be an increase in pupil numbers, however Ysgol Llanbedr will remain a small school. It is unlikely that the school will reduce surplus places to within 10% in the near future. There are currently 32 full time pupils at Ysgol Llanbedr and 4 part time pupils. Assuming all part time pupils transition to Reception in 2016 there would be 36 full time pupils at Ysgol Llanbedr. The capacity of Ysgol Llanbedr will increase to 77 full time places as of September 2016 which would result in a surplus capacity of 53.2%.

Pupil numbers at the school have remained static for a number of years however a higher than average intake to Reception would indicate that consultation regarding the future of the school has had no significant impact on intake at the school.

Pupil projections are calculated using an agreed methodology using the most recent PLASC data. These projections are updated with admissions data to provide a more accurate reflection each year. The pupil projections submitted by the Diocese and Governing Body are in line with the projections provided by the authority within the formal consultation document.

LDP

The birth rate in the Llanbedr/Llangynhafal ward has decreased over recent years as demonstrated in the table below;

Ward	2008	2009	2010	2011	2012
Llanbedr & Llangynhafal	11	8	9	8	4
Llanarmon yn Ial/Llandegla	11	17	15	17	21
Ruthin	56	53	66	67	54
Totals	78	78	90	92	79

Birth rates within the wider area have also remained static indicating there will be no significant increase in the overall pupil quantum in the near future indicating that surplus capacity will remain across the area as a whole.

The Council calculate how many additional pupils would be generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no. of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020.

There is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision. As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.

Surplus Places

The Welsh Government has set a 10% surplus places target for each local authority in Wales. The authority has been making progress toward the target however it has not reached the recommended 10%. Local authorities who bid for funding must demonstrate that they are taking appropriate action to ensure a greater efficiency and effectiveness of the school estate which includes rationalisation of school places where there are significant surplus places. The Welsh Government has set a target of 10% surplus places for each county in Wales.

7. Alternative Options/Federation

The Diocese of St Asaph supports the proposal for Ysgol Llanbedr to federate with another Church in Wales school and to change status to Voluntary Aided, would relieve the council of financial burden, support this proposal; Diocese and school have made excellent suggestion to federate and change status-would overturn many of your initial points in favour of closing; reconsider an alternative to save money; proposal is given full consideration. Suggest that sharing a head teacher with neighbouring school would help provide efficiency. Have not been given any other option other than closure, other options not explored by council; local authority has failed to adequately explore alternatives to closing the school.

The local authority has explored the option of Federation for Ysgol Llanbedr, the advantages and disadvantages of all alternative options were detailed within the formal consultation document. The authority broadly agrees with the benefits put forward in relation to federated school models however there are other issues, such as surplus places, fairer and more equitable distribution of school funding and greater efficiency and effectiveness of the school estate. These issues were detailed at the outset of the Ruthin area review of primary education. It is the view of the authority that whilst federation outcomes would realise some benefits such as stability of leadership, pupils access to a broader compliment of staff etc. these same benefits can also be realised through the option to close Ysgol Llanbedr whilst also providing economies of scale for the benefit of all pupils within the area.

As stated by the Diocese and also the Governing Body of Ysgol Llanbedr in their response to the consultation there are potential teaching, learning and educational experience enhancement opportunities for pupils. Options for sharing best practice and the pooling of resources can be achieved in a federated model however these benefits can also be achieved at a single site school. For example, Ysgol Borthyn the proposed alternative school, has a broad compliment of staff with an established senior leadership and middle management teams. The authority remains of the view that whilst these benefits can be realised in a federation the proposal to close Ysgol Llanbedr and transfer existing pupils to Ysgol Borthyn where pupils will have access to a broader compliment of teaching staff, curriculum leads and established leadership teams.

In a federated arrangement Ysgol Llanbedr will still remain a small school, surplus capacity will

remain and likely increase as of September 2016 due to a revised capacity assessment at the request of the school and Governing Body. The authority acknowledges that there will be an increase in pupils however there is not a general increase in the numbers of pupils across the Ruthin area indicating that the quantum of pupils will not change. Birth rates and pupil numbers have remained static for a number of years. The efficiencies and economies of scale that can be achieved by transferring pupils to Ysgol Borthyn with a sustainable number of pupils, single governance and established leadership structures will provide better use of resource and provide pupils with a broad range of learning and development experiences and opportunities.

The Diocese and Governing Body would be able to bid for funding via the Welsh Government capital grant scheme for VA schools. Accessing such resources is dependent upon 15% contribution from Church in Wales and / or Governing Body of the Federated schools. Any expansion of the school/school site would lead to an increase in the overall pupil capacity, likely leading to an overall increase in surplus capacity in the area.

The authority remains of the view that in light of the benefits that can be realised through federation (and these benefits were detailed within the formal consultation document) and light of the availability of alternative provision within the area. The authority's response in full can be found (appendix 1) [here](#).

In determining a way forward full consideration was given to the alternative options such as Federation, maintaining the status quo, amalgamation/area school, change of status have been explored by the authority. The advantages and disadvantages of these options are detailed within the formal consultation document.

There is no requirement on local authorities to consult on more than one option although authorities can do so were they feel this is appropriate. Estyn commented "The proposer has considered alternatives to its proposal. These include maintaining the status quo, federation or amalgamation with another Church in Wales primary school, becoming a voluntary aided school and expansion of the current site and closure. The proposer has demonstrated clearly the advantages and disadvantages of each option and the reasons for the preferred option."

8. Consultation Process

Proposal to transfer the children to Ysgol Borthyn is flawed; Minister ruled to keep the school open and straight away the Council restarted the process for closure; concerns about why a second consultation has been started so soon after the first; can you advise is an investigation has been done into this matter- flawed first consultation (1st consultation); Little confidence in the process being conducted in a fair and honest manner; Concerned evidence base used by council is flawed- numbers at school recovering yet council forecasts do not seem to reflect this; I feel the consultation period should be made known properly in the community; Pre-determined decision to close Ysgol Llanbedr

Consultation Process

The proposal has been formulated in accordance with the requirements as set out in the School Organisation Code. The authority did not announce a second consultation for closure 5 days following the issuing of the decision by the Minister for Education and Skills on the 27th January 2015. The report taken to Cabinet on the 17th of February 2015 was to inform Cabinet members of the Ministers decision and to set out the recommendations within the determination letter. In this report it was recommended that a consultation take place with the Church in Wales Diocese of St Asaph regarding the future of Ysgol Llanbedr. This took place between the 20th of April 2015 and the 18th of May. Representatives from the Diocese of St Asaph and the Governing Body were included within pre-Cabinet briefing meetings during this period and presented an alternative proposal to be considered by members. A decision to formally consult on the proposal to close was not taken by Cabinet until 2nd June 2015 providing adequate time for the Council to evaluate the Ministers recommendations.

The consultation document was sent to over 700 consultees including Ruthin Town Council and Llanbedr DC Community Council. 539 responses were received as part of the consultation indicating that there was a significant awareness of the consultation in the local and wider community. No decision has been made regarding the future of Ysgol Llanbedr. Decision makers must consider the proposal afresh and consider the responses submitted as part of the consultation period.

Data

The data contained within the consultation document was the most recently available school census data- January 2015. The data for the school census is returned by individual schools. The authority has acknowledged that pupil numbers will increase at Ysgol Llanbedr which is reflected in the pupil projections contained within the consultation document. The pupil projections submitted by the Governing Body and Diocese are in line with those produced by the authority.

9. Impact on Pupils Well-being

Constant disruptions to the children's education and well-being are not acceptable; second consultation leaves children in uncertain situation, find it distressing; inadequate consideration of the impact of a second consultation on the psychological health and well-being of pupils at Ysgol Llanbedr

The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response.

The authority, in conjunction with the Governing Body of Ysgol Llanbedr DC, facilitated a consultation session for the pupils of Ysgol Llanbedr which allowed them to put forward their views on the proposal. The children and young people's version can be found [here](#).

Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.

10. Local Development Plan

LDP has plans for 80 new houses- generate demand for Ysgol Llanbedr; developers unlikely to develop houses without nearby schools

The Council calculate how many additional pupils would be generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no. of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020.

There is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision. As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.

11. Financial

Cost per pupil is coming down and will return to the Ruthin average; Ysgol Llanbedr is the lowest budget school in Ruthin area; has managed its budget this year without deficit; Council estimates savings of £126k- it will in fact be virtually nothing; No capital gain for Council from land/buildings; Added cost of transport to other schools; cost of developing alternative accommodation at another school; additional special needs requirements; redundancy payments of staff

Per Pupil Funding

The proposal would result in a more equal distribution of funding within the area. The reduction in surplus places would allow funding to be released and re-distributed more directly to the benefit of the learner. Elements of the school budget that are pupil led would follow the pupil to their new provision should the proposal be implemented. Should all pupils transfer to Ysgol Borthyn this would result in an increase in Ysgol Borthyn's budget of £86k (based on the current budget 2015/2016). This would result in per pupil funding of approximately £4,058, the Denbighshire average is £3,931. Pupil led funding allows the schools to ensure there is sufficient resource for the pupils.

Ysgol Llanbedr Budget

Ysgol Llanbedr's budget share is the lowest within the Ruthin area as it currently has the lowest number of pupils on roll. The authority is aware that the school has a marginal surplus. However, the school budget is directly linked to pupil numbers and therefore would be expected to have a small budget compared to larger schools.

Savings

Should the proposal be implemented and all existing pupils of Ysgol Llanbedr (nursery pupils have been included within the exercise as they would transition to reception class in September 2015) transferred to Ysgol Borthyn 15 pupils would be entitled to free school transport. The per annum cost would be approximately £26,600. By deducting the estimated transport costs it would result in an overall net saving of £104,056.

The non-pupil led sum (£104k) would be reinvested within the Council's corporate plan to deliver the priority area of improving school buildings and facilities. This would be achieved by using the savings to generate prudential borrowing which in turn would fund investment works within Denbighshire's schools.

The authority would not pursue proposals to close any school based solely on financial gains such as capital receipts. In some instances this can be a residual benefit however educational aspects of the proposal can outweigh such financial benefits and must be the primary concern.

The authority has provided information relating to recurrent costs (such as an annual revenue saving from mobile rental) and has detailed the transport costs should the proposal be implemented. The authority has also set out why Ysgol Borthyn does not require investment as the facilities are adequate and have a good condition and suitability rating.

As of September 2015 there were 71 surplus places within faith provision in the Ruthin area. Should the current proposal be implemented there is sufficient capacity within the system without the need to develop additional accommodation.

12. Accessibility of School Places and the Impact on Parental Choice and Faith Provision

Proposal reducing parental choice of provision; important to offer parental choice in education; Proposals for closure of other schools in the area including Rhewl, Pentrecelyn, Llanfair and Rhos Street; Ysgol Llanbedr school at centre of a faith community, removes parents right to educate their children in a faith community based school; Have a strong faith which they developed at Ysgol Llanbedr; Parents value strong Christian ethos at Ysgol Llanbedr and excellent engagement school has with the Church in Wales

The alternative school, Ysgol Borthyn, provides a faith based education. The authority recognises the importance of faith based provision within education. Parents who wish for their child/children

to attend a faith based English medium provision will be able to continue to do so. At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places.

The authority acknowledges that there are a number of factors that determine where parents send their child/children. However, local authorities are unable to maintain all schools in the current financial climate especially where there are significant surplus places within the system. Should the proposal be implemented there will still be a mix of provision within the Ruthin area including rural, town, faith and language provision.

Ysgol Borthyn is also a Church in Wales primary school, this would provide pupils with continuity in faith based provision should the current proposal be implemented. Estyn commented that "daily acts of collective worship and close links with the local church provide pupils with valuable opportunities to reflect on spiritual and moral issues" and that "links with the local church enrich pupils' spiritual experiences". Furthermore that "the school's partnership with Llanfwrog Church helps pupils to make good progress with their spiritual development. There are weekly visits by the rector to assembly and classes, and pupils perform services in the church on religious festivals. These, plus school visits to places of worship, such as St Asaph Cathedral, support the religious education syllabus well."

The Ruthin are review commenced in 2013, a number of related proposals were put forward as part of the review. The review was undertaken on area basis to ensure that one proposal did not have a negative impact on neighbouring schools. Should all proposals as part of the review be implemented sufficient capacity would remain in the area to allow for parental choice for language medium and faith based provision. The review will consequently realise an investment of £15million and 4 new school buildings and facilities within the Ruthin area.

The proposed alternative school, Ysgol Borthyn, provides a faith based provision. Should the proposal be implemented parents who wish to access this provision will be able to do so. Further faith based provision is also available within the Ruthin area at Ysgol Llanfair DC. Although the school is proposed to close, should this be approved it would form a new area school which would retain the faith based provision and the language offer.

13. Community and Welsh Language Impact Assessment

Do not believe assessments are robust enough. Limited set of criteria and impact rated as neutral when it should be negative such as community demographics; DCC community impact assessment has shown there to be no positive impacts from closure of the school and highlights the impact on community activities; we do not feel a suitable and sufficient Community and Welsh language impact assessment has been carried out as part of the consultation process- many impacts have not been considered; Welsh impact assessment gives insufficient information given on the use of Welsh in Borthyn and the other schools; Llanbedr has after school Urdd club and all pupils are members of the Urdd; closure of Llanbedr will have negative impact on the Welsh language; school committed to promoting Welsh language and culture; impact assessment shows 97% of pupils speak Welsh- closure of Llanbedr would have negative impact on Welsh language; keen for my children to learn Welsh- encouraged in Ysgol Llanbedr- will they be getting the same encouragement in other Category 5 schools in the area?

The authority acknowledges that school closure will inevitably impact upon a community. It is recognised by the authority that the school plays an important role in the community, should the proposal be implemented there would be scope to extend links with Ysgol Borthyn and the Llanbedr DC community.

There is a separate village hall located within Llanbedr which is utilised for events in the village. The school does not have a hall facility however the astro-turf pitch is used by the wider community. The authority would be open to working with the Diocese and local community to retain use of the facility for the local community. The authority has provided a response to the issues raised within the community impact assessment in section two of this table.

Ysgol Llanbedr is a Category 5 schools and Welsh is taught as a second language. The proposal provides parents with the option for English medium education for their children with Welsh taught as a second language. This is similar to the current position and pupil access. The current proposal provides access and maintains parental preference for language medium.

The national curriculum for the Foundation Phase includes Welsh Language Development (Welsh as a second language). Pupils in the Foundation Phase should learn to use and communicate their needs in Welsh to the best of their ability. Pupils should be encouraged to do so and should be increasingly exposed to Welsh. At Key Stage 2 pupils should build on these skills. This is followed by all schools in Wales, such as Category 5, schools which teach Welsh as a second language. The data provided within the assessment is clear that no pupils speak Welsh fluently. 32 pupils can speak Welsh but not fluently and 1 pupil cannot speak Welsh. This data was provided by the school.

The impact assessment included outcomes at the end of Key Stage 2 Second Language Welsh assessment for Ysgol Borthyn with 100% of pupils gaining the expected outcomes. There is no data available for 2014 for Ysgol Llanbedr however in 2013 this was 100% and for Ysgol Borthyn in the same year this was 90%. Both were above the local and national average. Should the proposal be implemented pupils of Ysgol Llanbedr would receive an equivalent standard in respect of Welsh language provision.

Denbighshire County Council is committed to the Welsh Government's aspiration of delivering 'a sustained increase in both the number and percentage of people able to speak Welsh' and recognise the importance of bilingualism in the 21st century. DCC have adopted a long term aspiration that all children and young people in Denbighshire will leave full time education being competent and confident in using both Welsh and English. Outcome 5 of the Welsh in Education Strategic Plan aims to have 'more learners with higher skills in Welsh' including Welsh second language.

14. Impact on Staff

Request clarification that salary will be guaranteed up to and including 31st of August 2016

Do not feel consultation document conveys the high value of work of staff

The value of the staff is recognised by the authority. The authority also recognises the uncertainty that school reorganisation proposal can bring. Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as redeployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff. All members of staff have been offered support by HR and a member of the HR team has visited the school during the consultation period.

15. Impact on Local Economy

Ruthin and surrounding area benefit from professionals and business people moving to the area- Denbighshire will lose out from council taxes and benefits to the local economy

The authority notes the concerns regarding the impact on the local economy. However, the Council's policy clearly states "Any review of schools within an area will have to take into consideration the impact and benefit a school or its facilities within the local community. The Community Impact Assessment will take into consideration both the community use of the school buildings and the wider impact the school has within the community. However, the overriding factor in any such review would be the effect on the standard of education and lifelong learning

to be provided in the area."

The authority notes this concern. However, there are a number of villages within Denbighshire, and wider, which do not have village schools but continue to have a thriving and engaged community. Should parents wish for their child/children to access a village school provision there are schools within the area with surplus places.

The authority has acknowledged within the Community Impact Assessment that a school closure would inevitably impact on a community but the proposal overall will assist in safeguarding the standard of education in the area.

16. Glasdir Development

Development of a new community school will undoubtedly have detrimental impact on the school (Borthyn); Risk of Ysgol Borthyn closing when the new school is built on Glasdir site

It is the view of the authority that the new development for Rhos Street School and Ysgol Pen Barras will not have an adverse impact on Ysgol Borthyn. The capacity of the new development on the Glasdir site takes into account the capacity of the overall area and general quantum of pupils. Additional capacity that is not required will not be 'built in' to the detriment of another school in the area.

17. Alleged Mismanagement of the LEA in 2011-2012

Surplus places due to mismanagement in 2011-2012 by LEA; led to excess of surplus numbers; pupil numbers at a historical low due to the council mismanaging the appointment of a new permanent head teacher.

Support was provided to the school and Governing Body during 2011-2012. A solution to the issues was reached in mutual agreement with the Governing Body at the time. Ysgol Llanbedr received extensive support from the school improvement team which saw pupil numbers stabilise.

END



Appendix E

Standard Response Form Analysis

1. Introduction

- 1.1. As part of the formal consultation document pack a standard response form was attached to help elicit responses from consultees. The form was attached in hardcopy to the consultation document and was also available electronically.
- 1.2. The standard response form was designed to establish;
 - Whether or not people were in favour of the current proposal;
 - The capacity in which they were responding;
 - Whether or not they were linked to either school;
 - What has influenced their views on the proposal;
 - Whether parents would send their child/children to the alternative school or another provision if the proposal was to be implemented;
 - Collate any comments regarding the proposal, either positive or negative.
- 1.3. In total 427 standard response forms were completed and returned. This report provides an analysis of the responses received.

2. Analysis of Responses

- 2.1. Respondents were asked if they were in favour of the current proposal or against, 97.9% of respondents were against the current proposal;

Are you in favour of the current proposal;		
Yes	6	1.4%
No	418	97.9%
Skipped	3	0.7%
Total	427	

- 2.2. Respondents were asked to indicate who they were responding as e.g. parent, community member etc. The majority of respondents indicated that they were community members;

Type of respondent;	
Pupil of Ysgol Llanbedr	4
A parent of a pupil of Ysgol Llanbedr	47
A Governor of Ysgol Llanbedr	4
A staff member of Ysgol Llanbedr	4
A pupil of Ysgol Borthyn	1
A parent of a pupil Ysgol Borthyn	3
A Governor of Ysgol Borthyn	5
A staff member of Ysgol Borthyn	2
Community member	301
Skipped	53
Total	427

- 2.3. Respondents were asked what had influenced their views about the proposal;

Please tell us if any of the following has had an influence on your view of the proposal;	
Impact on educational provision	371
The impact on the community	369
Other/Additional*	51
Total**	793

**Comments submitted by respondents can be viewed in the table below **Respondee could choose more than one answer*

- 2.4. Respondents had the opportunity to provide additional comments regarding what had influenced their views. Comments received are outlined below alongside a response or point of clarification from the local authority;

Ref.	Comment	Response
1A	<p>I'm worried that should these two schools close then there will be a detrimental effect on Llanfair school which has already suffered as a result of its amalgamation with Pentrecelyn, by this I mean in terms of increasing numbers of pupils at Llanfair and a worse pupil/teacher ratio as parents of Llanbedr may choose to move their children to the new area school in Llanfair.</p>	<p>Ysgol Llanfair DC has been identified by the authority as a possible alternative provision should the current proposal be implemented. The proposed alternative school is Ysgol Borthyn, Ruthin. However, Ysgol Llanfair DC offers a faith based (Church in Wales) provision. The language category of Ysgol Llanfair DC is Category 2; a Category 2 schools are dual stream schools. Category 2 schools provide Welsh medium and English medium provision side by side dependent on parental preference.</p> <p>If parents choose Welsh medium the delivery language of the pupil's education, the language of communication with the pupil and educational assessments are in Welsh- the same as Category 1 schools. If parents choose for their child to be educated through the medium of English the curriculum is delivered in English, the communication language with the child is in English and any assessments are done in English- the same as a Category 5 school.</p> <p>Based on the provision available at Ysgol Llanfair DC and the home locations of some of the existing pupils of Ysgol Llanbedr it is deemed reasonable that Ysgol Llanfair may be impacted by the proposal. There are currently 23 surplus places at Ysgol Llanfair DC as of September 2015.</p>
1B	<p>Impact on the economic well-being of the area - hampering attracting people to move into the area with the desire to send children to small village school. Impact on local business, no job= no money= no local spending.</p>	<p>The authority notes this concern. However, there are a number of villages within Denbighshire, and wider, which do not have village schools but continue to have a thriving and engaged community. Should parents wish for their child/children to access a village school provision there are schools within the area with surplus places.</p>
1C	<p>The village based community church school is a fantastic environment for a child to be educated into a wholesome individual. This school should be given the opportunity to grow with the community. Fantastic location. Some of my family live there</p>	<p>The authority notes the concerns regarding the impact on the local community. However, the Council's policy clearly states "Any review of schools within an area will have to take into consideration the impact and benefit a school or its facilities have within the local community. The Community Impact Assessment will take into consideration both the community use of the school buildings and the wider impact the school has within the community. However, the overriding factor in any such review would be the effect on the standard of</p>

	<p>and have enjoyed contact with school on many occasions. I am concerned that you are taking this away from the elderly members of this community, and inevitably lowering their house prices unfairly. The impact of losing a local school providing top quality education and the disruption of the heart of an historical village. Former pupils are saddened by the proposal and mourn the loss of such a valuable service to Welsh village life.</p> <p>Impact on the economic well-being of the area - hampering attracting people to move into the area with the desire to send children to small village school.</p> <p>Impact on local business, no job= no money= no local spending.</p>	<p>education and lifelong learning to be provided in the area."</p> <p>The authority has acknowledged within the Community Impact Assessment that a school closure would inevitably impact on a community but the proposal overall will assist in safeguarding the standard of education in the area.</p>
<p>1D</p>	<p>Impact on children Impact on wider local area Impact on other schools in area. The impact on the young pupils who will be forced to make long journeys outside their community. The impact on my children. The impact on my children and all the children and staff at the school. The negative emotional impact This would have on my child. The impact on the staff and parents. The unjust action which is taking place for a SECOND time. Shoddy way in which Denbighshire has</p>	<p>The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response.</p> <p>The authority, in conjunction with the Governing Body of Ysgol Llanbedr, facilitated a consultation session for the pupils of Ysgol Llanbedr which allowed them to put forward their views regarding the proposal. The findings of the session are set out in Appendix C.</p> <p>Prior the commencement of the formal consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the</p>

	<p>treated the school and community. The children. You are not thinking about them. They are clear they want to be schooled in Ysgol Llanbedr. Stress caused to children and families by conducting an unprecedented second consultation. The previous consultation was more than a minor technical flaw. The impact and uncertainty for the children -again! It's just not very professional putting the ones you say you are trying improve the education through this twice. Welfare of the children. The impact on wellbeing of pupils, staff and parents. Impact on grandchild's well-being. Children having to go through closure for second time.</p>	<p>relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p> <p>Any school re-organisation process could result in staff redundancy. However the council would actively seek re-deployment as a preferred option for staff. In previous cases of school closures within Denbighshire redundancies have been minimal with the majority of staff redeployed.</p> <p>Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as re-deployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff.</p> <p>All members of staff have been offered support by HR and a member of the HR team has visited the staffing body during the consultation period.</p>
1E	<p>The school is inappropriately placed, There are too many cars being driven there on school runs, with inconsiderate drivers driving too fast along a small single-track country lane. This risks lives of local people, and of the very few schoolchildren whose parents actually walk them to school.</p>	<p>This view is noted.</p>
1F	<p>There is ample evidence that there is need for church school places in the area. Llanbedr school is fully subscribed. Potential loss of a faith school discriminates against faith. The reduction in Church in Wales School</p>	<p>The authority acknowledges the importance that faith based provision has within education. Ysgol Borthyn has been proposed as an alternative provision should the current proposal be implemented. Ysgol Borthyn provides an English medium faith based provision. There are currently 26 full time surplus places at Ysgol Borthyn (September 2015) and 6 part time surplus places.</p> <p>Other alternative faith based provision also exists within the</p>

	<p>places. The importance of receiving an education within a small, nurturing faith school. Ysgol Llanbedr is a viable school and there is clear demand for two English medium church schools in the Ruthin area, closing Ysgol Llanbedr removes 77 places that are needed. There is not enough capacity in other church schools to accommodate the projected pupils. Denbighshire County Council would be significantly reducing church school places if they proceeded with the proposal. The faith development of young people in rural areas outside the town of Ruthin. The impact on church school places. It is very important to have a Christian school in the area. Christian ethos.</p>	<p>Ruthin area with Ysgol Llanfair DC offering a faith based provision within a Category 2 language offer. Please see section 1A of this table for further information relating to categorisation of primary schools and the offer provided. At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. The surplus within faith provision as of September 2015 was 71 places equating to 22.9%. There are a further 133 surplus places within alternative English medium provision within the Ruthin area.</p> <p>Additionally, some pupils have alternative Church in Wales English medium schools closer to their home locations other than Ysgol Borthyn and Ysgol Llanfair DC. Should the proposal be implemented parents who wish to send their child/children to an alternative English medium faith based school will be able to do so. Home to school transport will be in line with the Council Transport Policy.</p>
<p>1G</p>	<p>LDP states that Llanbedr should have over 70 new houses built over the coming years. With no local school the area will not be as popular with developers, without a school the houses will not sell so well, thus Denbighshire will be cheated out of Council Tax. Yet again Denbighshire would have failed to see the economic long term advantages of attracting home purchasers and Council tax payers to the County.</p>	<p>The Council have adopted a formula which generates a potential pupil yield as a consequence of new housing developments. The primary school multiplier is 0.24 pupils per dwelling. Should 70 homes be built within the Llanbedr area this would generate around 17 additional pupils. Currently 20 homes have been identified to be built by 2020 by developers. This includes 5 homes in 2017, 5 homes in 2018 5 homes in 2019 and 5 homes in 2020. There is currently no indication from developers that the remaining 50 homes will be built prior to 2020.</p> <p>The authority also recognises there are a number of factors that determine where parents send their child/children. There is no guarantee that all of these pupils would access the provision offered at Ysgol Llanbedr DC due to parental preference for language medium and other types of provision. As of May 2015 there were 37 pupils of primary school age residing in the Llanbedr DC area. 12 pupils were attending</p>

		other Category 5 English medium schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 were accessing Welsh medium education and a further 2 pupils were accessing Category 2 schools. 11 pupils from Llanbedr DC attend Ysgol Llanbedr.
1H	People have chosen to send their kids to Llanbedr as I have been to Pen Barras. They don't want to change schools and why should they?	In the current financial climate local authorities are unable to maintain all schools, especially where there are significant surplus places within the system. Should all proposals related to the Ruthin area review be implemented a range of provision will continue to be maintained including faith and language provision.
1I	The unprecedented re application to the Welsh Government shortly after the Welsh Government ruled in the school's favour.	As a point of clarification there is no application to the Welsh Government to formally consult. A decision to formally consult on the proposed closure of Ysgol Llanbedr DC was taken by DCC Cabinet of elected members in June 2015.
1J	Austerity from 2010 lead by the coalition govt, has destroyed communities around the uk especially rural communities with a smaller population, none the less all governments have a duty to uphold national schooling programmes, closing down of so many social community buildings shows a total lack of commitment by councils across the country and destroys the sprite of these hard working tax paying families, if these closures where in the south east or west of the country it wouldn't be happening, why are we being the poor country of the UK?	This comment is noted.
1K	Both educational impact and community are huge parts of our objection but we also object due to economic reasons (we cannot both work full-time without the	This is noted and the authority acknowledges that school organisation proposals and processes bring uncertainty. The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response. The report is set out in Appendix C of this

	<p>exceptional wrap around childcare), and decency. The decision of the Cabinet to move to close the school a few days after letting us hold a celebration party at school is cruel in the extreme. The Council does not have the right to act in a way which damages the happiness and stability of our children. You have no idea how difficult this has been - I dread to think how he will view democracy as he grows up having seen such unashamed unfairness demonstrated by "Grown Ups".</p>	<p>formal consultation report pack and Appendix D contains the Children and Young People's version.</p> <p>Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p>
1L	<p>The excellent education received by the children.</p>	<p>This is noted however as part of their response to the consultation Estyn concluded that the proposal is likely to at least maintain the current standards of education in the area based on the information and data provided within the consultation document. The authority included a range of data and statistical information within the consultation document relating to outcomes and standards at Ysgol Llanbedr and Ysgol Borthyn. This included contextualised data at both Foundation Phase and Key Stage 2. Data for other schools in the area has also been included within the consultation document. Tables relating to outcomes across the Ruthin area and in individual schools at both the Foundation Phase and Key Stage 2 are provided in 2A.</p> <p>A full response to the educational aspects of the proposal and a comparison between educational outcomes and standards at both Ysgol Llanbedr and Ysgol Borthyn can be found in section 2A of the table contained in section 3.</p>
1M	<p>Grandchildren educated at Ysgol Llanbedr and are all the better for it.</p>	<p>This is noted.</p>
1N	<p>Childcare facility.</p>	<p>This is noted. A full response to wrap-around-care provision can be found in section 2G of the table contained in section 3.</p>

- 2.5. Respondents were asked if the proposal was to be implemented would they send their child/children to Ysgol Borthyn, the proposed alternative school, or an alternative provision;

If the current proposal was implemented would you send your child/children to Ysgol Borthyn or an alternative provision? (those who have stated they are a current or prospective parent of Ysgol Llanbedr)	
Ysgol Borthyn	5
Other**	12
Skipped/Not Applicable	30
Total*	47

*Respondents who indicated they were parents or prospective parents of Ysgol Llanbedr.**Respondents who stated that they would choose alternative provision stated they would possibly choose Ysgol Gellifor, Ysgol Bro Famau, Rhos Street School, home school or look at other schools out of the area.

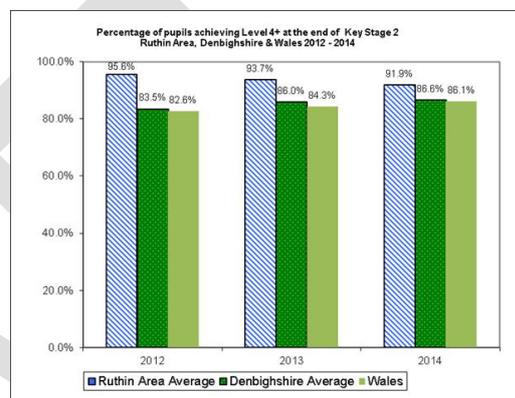
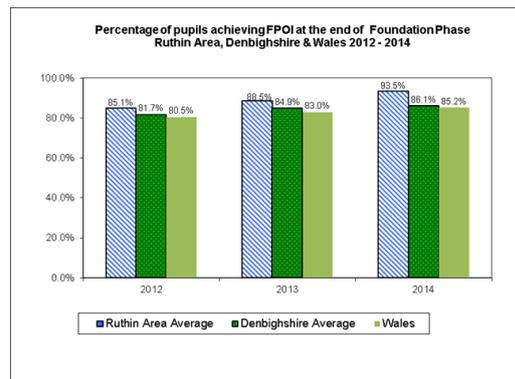
3. Response to Issues Raised

- 3.1. Respondents were invited to provide further comments or observations regarding the current proposal. These have been grouped into themes below alongside a response or point of clarification from the local authority.

Issue Raised	LA Response
2A Educational Provision	84 respondents raised issue
Educational Provision: <i>unique educational environment; The school makes a great educational start for primary children; village based community church school is a fantastic environment for a child to be educated into a wholesome individual; brilliant school; small class sizes; Ysgol Llanbedr is providing an excellent education for its pupils as it has done for many years; dedicated hardworking staff; Ysgol Llanbedr is the only English medium, rural faith school in the Ruthin area. Ysgol Llanbedr consistently delivers exceptional education to the pupils in a wonderful environment, indoor and outdoor and because of this Ysgol Llanbedr is now growing and is seen as a desirable school for a many families from within the traditional catchment area for the school and further afield; School is highly recommended great facilities and great staff; educational</i>	<p>Many respondents have outlined the current provision at Ysgol Llanbedr especially in terms of educational delivery such as;</p> <ul style="list-style-type: none"> ▪ Small class sizes; ▪ Provides an excellent education; ▪ Dedicated staff; ▪ Wonderful environment- indoor and outdoor; ▪ Provides a family community environment. <p>Estyn, in their response to the formal consultation, concluded that should the proposal be implemented the standards of education within the area would at least be maintained. It is the view of the authority that should the proposal be implemented and pupils transfer to Ysgol Borthyn, or another of the identified alternative provision, they would have access to at least an equivalent standard of provision.</p> <p>Educational outcomes and attainment across the Ruthin area are good as a whole, the tables below display the Ruthin area average for the Foundation Phase and Key Stage 2 (this information was also contained within the</p>

standard that is good and better than the average within Denbighshire and Wales; The children do very well academically, they leave school confident, with a positive attitude to learning and ready for high school; village school provide a nurturing environment; Unparalleled high standard of teaching excellence; school provides a family/community environment which I value; teaches children to a high standard above some of the other local primary schools

formal consultation document);



The tables below displays the outcomes at the end of the Foundation Phase and Key Stage 2 in all schools identified in the consultation document, this includes the outcomes for the 2014/2015 academic year;

Foundation Phase- Outcome 5 and above						
	2010	2011	2012	2013	2014	2015
Llanbedr	85.7%	87.5%	100%	83.3%	100%	100%
Borthyn	82.4%	77.3%	58.8%	53.8%	100%	70%
Rhos Street	88.9%	90%	95.2%	100%	100%	100%
Gellifor	100%	94.7%	100%	100%	93.3%	75%
Bro Famau	100%	90%	81.8%	90.9%	80%	100%
Rhewl	100%	100%	66.7%	83.3%	85.7%	70%
Llanfair DC	94.1%	86.7%	100%	100%	92.3%	100%
D'shire Av.	82.4%	79.8%	86.4%	84.9%	86.1%	86.4%
Wales Av.	81.6%	82.7%	80.5%	83%	85.2%	86.8%

Key Stage 2 Level 4+						
	2010	2011	2012	2013	2014	2015
Llanbedr	84.6%	100%	85.7%	100%	n/a	n/a*
Borthyn	58.8%	78.6%	92.3%	93.3%	80%	83.3%
Rhos Street	93.5%	93.3%	96.6%	92.6%	100%	100%
Gellifor	92.9%	92.3%	100%	91.7%	100%	100%
Bro Famau	91.7%	100%	94.4%	95.8%	100%	100%
Rhewl	100%	100%	100%	100%	75%	90.9%
Llanfair DC	88.9%	91.7%	100%	94.1%	93.3%	100%
D'shire Av.	78.1%	82.3%	83.5%	86%	86.6%	87.9%
Wales Av.	77%	80%	82.6%	84.3%	86.1%	87.7%

*Data has been omitted as it is potentially disclosive

During the formal consultation period the outcomes for the 2014/2015 academic year were not available. The 2015 outcomes are displayed in the table above. The tables below provide contextualised data for both Ysgol Llanbedr and Ysgol Borthyn for the 2015 academic year;

Contextualised Data Foundation Phase Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	0	1	0	7
Borthyn	6	1	2	10

*Total includes pupils in cohort who are not ALN/FSM/EAL

Although in 2015 the outcomes at Ysgol Borthyn for the Foundation Phase were below the local and national average, 60% of the cohorts were pupils with Additional

Learning Needs including 2 pupils who are statemented. A further 20% of the cohort were pupils with English as an additional language (EAL). In summary 80% of the cohort were pupils with ALN or EAL. No pupils at Ysgol Llanbedr had Additional Learning Needs and no pupils were EAL. The Free School Meals % at both schools for the assessed cohorts were similar.

Contextualised Data Key Stage 2 Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	n/a**	n/a	n/a	n/a
Borthyn	9	2	5	24

*Total includes pupils in cohort who are not ALN/FSM/EAL
 **Data has been omitted as it has potential to be disclosive. Data has been provided to decision makers.

Ysgol Borthyn saw an improvement in attainment at Key Stage 2 from the last academic year although this was not above the local or national average. There were a total of 24 pupils in the assessed cohort, 9 of these pupils had additional learning needs equating to 37.5% of the overall cohort with a further 5 pupils having English as an additional language (EAL) equating to 20.8% of the overall cohort. Of the total cohort 8.3% were FSM. The cohort in Ysgol Llanbedr was small; the data relating to the cohort is potentially disclosive. The data has been made available to decision makers.

2B School Facilities **21 respondents raised this issue (some respondents included this within the above educational provision)**

School Facilities: *Fantastic location; it has more potential than other schools in the area with its grounds and setting; safe and secure site; Llanbedr has an AstroTurf, large field, purpose built car park, great outdoor facilities, outdoor learning areas and equipment, safe, aesthetically pleasing site; site at Llanbedr is wonderful greenfield site surrounded by fields; Space for expansion or development*

Many respondents have outlined the facilities available at Ysgol Llanbedr, in particular attention has been drawn to its outdoor facilities. Although respondents believe that the outdoor facilities at Ysgol Llanbedr are of a better quality to those at Ysgol Borthyn and other alternative schools the facilities available at alternative schools are equivalent to those provided at Ysgol Llanbedr.

Estyn also found the learning environment at Ysgol Borthyn to be good stating "The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well." Ysgol Borthyn has sufficient outdoor hard play area which is utilised for outdoor activities year round. It is recognised that this is not an astro-turf facility however it would not impact on the pupils access to outdoor PE provision should the

	<p>current proposal be implemented.</p> <p>Respondents have noted that the school has an astro-turf located on the site (which is also used for community use). Ysgol Borthyn, or any of the neighbouring alternative schools do not have a multi-use games area/astro-turf, however the new development at Glasdir would likely provide a multi-use games area. Respondents have also claimed the site has more potential than other schools to expand, however expansion of the site would require significant capital investment and would likely lead to an increase in surplus places within the area.</p>
<p>2C Impact on Pupils/Families</p>	<p>45 respondents raised this issue</p>
<p><i>Impact on Pupils/Families: The closure of the school will be detrimental to the children's well-being; damaging to the well-being and consequently to the educational attainment of those pupils; the impact on the children during an extremely vulnerable time in their education - their foundation years-appears to be irrelevant to the MET. The children should not be under this amount of uncertainty which could cause anxiety and stress at this early stage in their life for the second time; children's document had to be re-written – wrongly worded and misleading</i></p>	<p>This is noted and the authority acknowledges that school organisation proposals and processes bring uncertainty. The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process.</p> <p>This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response. The report is set out in Appendix C of this formal consultation report pack.</p> <p>Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p>
<p>2D Impact on staff</p>	<p>21 respondents raised this issue</p>
<p><i>Impact on Staff: Uncertainty, stress</i></p>	<p>Any school re-organisation process could result in staff redundancy. However, the council would actively seek re-deployment as a preferred option for staff. Where school organisation proposals have been implemented previously redundancies have been minimal with the majority of staff re-deployed. Costs for support from HR are absorbed by the SLA and would not reduce the proposed savings. Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as redeployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff. All members of staff have been offered support by HR and a member of the HR team has visited the school during the consultation period.</p>

2E Impact on the Community and Local Area	86 respondents raised this issue
<p>Impact on Community/Local Area: <i>The school has been at the heart of the community for many years; Impact on the economic well-being of the area - hampering attracting people to move into the area with the desire to send children to a small village school; I feel that rural schools should be kept open to give village identity and community activity; large influence on many aspects of the local community; village schools are a large part of the local communities and need to be maintained; Closing local schools has a detrimental effect on the community it serves. We are supposed to support our rural communities and more and more is being taken away from them; The loss of this school would be detrimental to the local community; Ysgol Llanbedr has served the village of Llanbedr DC and the wider community for over 150 years; and inevitably lowering their house prices unfairly; They benefit greatly from the links this provides with other residents of the village. They enjoy taking part in community and church events such as the village show, Christmas lantern parade, church services, singing for the older people's luncheons and their presence in our regular events that we hold for the community. My children enjoy learning from older members of the community who volunteer in school, who give their time, skills and expertise willingly. I feel this village school is thriving and is the hub of the community. To close it would be detrimental to the whole of the village; Closing the school will destroy the community, the school is the heart and soul of the village and church; impact on families living in rural poverty has not been fully explored</i></p>	<p>The authority acknowledges that were school closures are proposed it will inevitably have some impact on the local community. The Code requires local authorities to produce a Community Impact Assessment to measure the impact and how the impact can be minimised or negated.</p> <p>It is recognised by the authority that the school plays an important role in the community, should the proposal be implemented there would be scope to extend links with Ysgol Borthyn as the proposed receiving school and the Llanbedr community. Due to the proximity of Llanbedr to the town of Ruthin the authority would seek to assist the Governing Body and PTA of Ysgol Borthyn to foster links with the wider Llanbedr community.</p> <p>The authority is aware that the school site is subject to a reverter and has not claimed that the release of the Ysgol Llanbedr DC site and building would result in a capital receipt which would be re-invested into the Modernising Education Programme. The authority does not believe that the content of the policy is misleading. In other instances where school buildings and sites have been subject to a reverter under Charity Commission Law, Denbighshire have worked with third parties, such as the Church in Wales Diocese to seek to retain the use of the building for the community, for example in Bryneglwys following the closure of the site and establishment of Ysgol Dyffryn Ial on a single site. Should the proposal be implemented the Council would facilitate discussions with the local community and the Diocese of St Asaph should they wish to seek to retain all or part of the building and/or site for community use.</p>
2F Alternative Provision	82 respondents raised this issue
<p>Alternative Provision: <i>The differences between Borthyn and Llanbedr are huge. Plus Borthyn is oversubscribed</i></p>	<p>Standards, Outcomes and Provision</p> <p>As part of their response to the consultation Estyn</p>

and parking impossible - it has a lower grade of education reported by last inspection; Borthyn- considering it is of a lower standard than Llanbedr itself; DCC claims the Borthyn school is equivalent- not borne out by the data published in the consultation; I know of no other school in the area that can match the facilities and standards of education; Moving to Borthyn will be a negative step; There is not the physical space in Borthyn for all the children from Ysgol Llanbedr as detailed in the consultation document; I do not feel Ysgol Borthyn is equivalent to or better than what Ysgol Llanbedr is offering, in fact, I don't feel any Ruthin school can offer the same standard of schooling; The increase in the number of pupils at the proposed school will affect road safety for all pupils; safety and suitability of schools and traffic in Ruthin-congested; The proposed school does not offer equivalent or better educational standards or facilities; Ysgol Borthyn is not a suitable alternative, the only alternative would be same or better - recent Estyn inspection put Borthyn at adequate , Llanbedr 's last inspection was on the old Estyn format but in summary was good in almost all areas; Borthyn doesn't have the space for Llanbedr's pupils or the parking facilities for pick up and drop off; the proposed new school on Glasdir only has capacity for Pen Barras and Rhos St children, you are in danger of putting Llanbedr's pupils in a position where there is not space for them anywhere; given a yellow banding and achieved excellent results in national tests, in order to send children to an 'adequate' school with an amber banding. Clearly, this is not offering parents and pupils an equivalent standard of education; Academically the proposed alternative school Borthyn is well below Llanbedr and cannot be considered a like for like alternative so yet again you are being deceptive claiming it is the same; From the tables in the consultation

concluded that the proposal is likely to at least maintain the current standards of education in the area based on the information and data provided within the consultation document. The authority included a range of data and statistical information within the consultation document relating to outcomes and standards at Ysgol Llanbedr and Ysgol Borthyn. This included contextualised data at both Foundation Phase and Key Stage 2. Data for other schools in the area has also been included within the consultation document. Tables relating to outcomes across the Ruthin area and in individual schools at both the Foundation Phase and Key Stage 2 are provided in 2A.

Where cohorts are small, such as at Ysgol Llanbedr, outcomes should be treated with caution. There have been no available Key Stage 2 outcomes at Ysgol Llanbedr for the last two academic years. Furthermore, Estyn stated that the proposer {DCC} had appropriately considered the impact of the proposal on pupil outcomes, provision and leadership and management. Estyn stated a useful range of information relating to performance outcomes.

Following a follow up visit in March this year Ysgol Borthyn has been removed from Estyn monitoring. Ysgol Borthyn has also appointed a permanent head teacher. Although Ysgol Borthyn is classified as amber and Ysgol Llanbedr as yellow the overall weighting for the two schools is similar with Ysgol Borthyn at 16.5 and Ysgol Llanbedr at 16. Both schools are in Standards Group 3.

Facilities

The authority has produced evidence relating to condition and suitability surveys at Ysgol Borthyn which indicate the school provides a good learning environment. Estyn also found the learning environment at Ysgol Borthyn to be good following an inspection in 2014 stating "The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well."

Pupils at Ysgol Borthyn have access to outdoor PE and utilise hard play areas year round, although this is recognised this would not be on an astro-turf facility.

document education is not equivalent- results are worse, environment is worse and inspection reports are worse; there is no equal alternative school in the Ruthin area;

Llanbedr one only 12 schools forecast a surplus budget- Borthyn due to have deficit in 3 years time- exacerbating the situation at Borthyn

Capacity of Ysgol Borthyn

As of September 2015 there were 32 Full Time pupils in Ysgol Llanbedr and 4 Part Time pupils. The current capacity of Llanbedr is 54 (this will increase to 77 as of September 2016 however a flexible admission number is currently being applied) which results in 22 surplus places equating to 40.7% of the total capacity. As of September 2015 there were 116 Full Time pupils at Ysgol Borthyn and 14 Part Time pupils. The current capacity of Borthyn is 142 which results in 26 surplus places equating to 18.3% of the total capacity. Part time (nursery places) are not included within the full time pupil capacity and are calculated separately. The table below provides current numbers of pupils on roll as of September for both Ysgol Borthyn and Ysgol Llanbedr;

	N	R	1	2	3	4	5	6
YL	4	10	7	3	7	2	3	0
YB	14	18	22	19	11	13	16	17
T	18	28	29	22	18	15	19	17

*N&R admission data as of September 2015.

Should the proposal be implemented and all full time pupils transfer to Ysgol Borthyn this would result in a total of 148 full time pupils. Ysgol Borthyn has accommodated full time pupil numbers greater than 142 full time pupils in the past. Within the capacity assessment there is potential accommodation for 23 further full time pupils at Ysgol Borthyn as per the capacity assessment. As demonstrated should all pupils transfer to Ysgol Llanbedr the pupils could be accommodated within the current class structures and would not exceed 30 pupils per class. There is also further faith provision within the Ruthin area, Ysgol Llanfair DC which has a capacity of 113 with 23 surplus places as of September 2015. Ysgol Llanfair DC is a Category 2 dual stream provision. The majority of parents who responded to the consultation stated a preference for other alternative provision with a small number displaying a preference for the proposed alternative.

The Council recognises that pupil numbers in Ysgol Llanbedr will increase over the coming years and this data has been contained within the pupil forecasts data within the consultation document. The authority remains of the view that these pupils coming through the system can be accommodated at Ysgol Borthyn within existing class structures going forward and the reduction in capacity within the English medium faith based primary sector would not result parental choice being removed.

Other faith based provision exists within the wider Ruthin area which would provide an English medium provision. The Church in Wales as a co-promoter with Denbighshire have recently published a statutory notice to establish a new Church in Wales area school to serve Llanfair and Pentrecelyn as a dual stream school at which pupils may be educated through the Medium of English as per the offer described in the categorisation of schools. At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school.

Capacity of Other Alternative Schools

The table below provides an overview of surplus places by school as of September 2015- Ysgol Llanbedr and Ysgol Borthyn are included for comparative purposes;

School	Capacity	Surplus
Ysgol Llanbedr	54*	22
Ysgol Borthyn	142	26
Ysgol Llanfair DC	113	23
Rhos Street School	189	27
Ysgol Bro Famau	135	56
Ysgol Gellifor	91	13
Ysgol Rhewl	82	37
Totals	806	204

*Capacity to increase to 77 as of September 2016

There are 182 surplus places within other alternative schools within the area, 49 places are within faith provision.

Highway/Parking/Drop off & Pick Up Concerns

Currently one pupil is transported to school at Ysgol Borthyn. School transport vehicles do not alight and

	disembark from the Denbigh Road to the front of the school but at the rear access of the school off the Porth y Dre housing estate.
2G Wrap-around-care	78 respondents raised this issue
Wrap-around-care: <i>Ysgol Llanbedr offers wrap around care which is needed by the parents due to work commitments; The school provides excellent wrap around care suitable for working families; Ysgol Llanbedr offers full wrap around care, breakfast club, after school club and holiday club. There is not equivalent care at Ysgol Borthyn; It provides a flexible, fun and stimulating environment that the children love which enables parents to continue working due to the affordable, accessible and convenient childcare; Llanbedr Munchkins is the only service in the area that provides wrap around care 8am-6pm and through holidays, this service is used by many from the Ruthin area not just Llanbedr allowing parents to work, ensuring the strength of the local areas economy; Munchkins is used by children from every school in the area during the year but it is solely reliant on Ysgol Llanbedr, as it cannot exist anywhere else; cannot work full time without wrap around care; misrepresentation that munchkins can be moved to another site</i>	<p>The Denbighshire County Council childcare sufficiency report (2014) noted that there were a total of 354 childcare places available in the Ruthin area. There were 258 children of 0-3 years of age in 2014 with 50% of childcare vacancies empty for this age range not taking into account 118 spaces within full day care private provision. The full day care provision in Ruthin has a daily capacity of 57% of the numbers it could cater for suggesting that there is more than adequate childcare options and places available within the area. Other full day child care is available in the Ruthin area.</p> <p>The authority notes concerns that 'munchkins' would not be viable without the school remaining open. It has been proposed that the village hall would be suitable however consultees have stated that this would not be an option as the village hall is well utilised throughout the day and could not accommodate the facility.</p> <p>Other schools, including Ysgol Borthyn, have wrap-around-care available. Ysgol Borthyn offers 'Borthyn Bunnies' playgroup for pupils aged two and a half years and over for morning and afternoon sessions. Other schools within the area also offer similar wrap-around-care provision, breakfast club and after school club. Although the authority recognises the importance to parents of wrap-around-care it is important to note that this is not a statutory provision.</p>
2H Consultation Process	19 respondents raised issue
Consultation Process: <i>Current proposal has not been consulted upon properly; un-precedented re-application to the WG shortly after WG ruled in their favour; should never have had another consultation; I do not believe the council has acted democratically in its procedures nor in the way it has consulted with the local community; less than two weeks between the decision from the minister before announcement of a new consultation- not enough time to review the current situation; section 4.7 consultation document mentions a birth rate of 21 but table shows 4 for Llanbedr- which is it? authority has not sought to explain</i>	<p>The authority has followed the process for consultation as per the School Organisation Code. The authority has conducted a broad consultation and has received a total of 539 responses to the consultation.</p> <p>The decision to formally consult was not taken until the 2nd of June 2015. The Minister in his decision letter stated that he was concerned about the future of Ysgol Llanbedr in the light of the relatively low number of children on roll and the temporary nature of current leadership. The authority has considered the Ministers recommendations; it remains the view of the authority in light of the current situation within the Ruthin area that closure remains the preferred option to ensure that educational standards are safeguarded for the future.</p>

<p>why in light of the previous decision by the minister it has decided to proceed with the proposal afresh</p>	
<p>2I Impact on Alternative Schools</p>	<p>5 respondents raised this issue</p>
<p>Impact on Alternative Schools: I'm worried that should these two schools close then there will be a detrimental effect on Llanfair; Difficult as we don't know what the new school provision will be for English Medium in Ruthin; most parents unlikely to move their child to Ysgol Borthyn so there would be additional demands made on other rural schools for placements; would be looking to send to Gellifor, Rhos Street or Llanfair- I think impact of this should be addressed and investigated</p>	<p>The impact on other provision within the area has been addressed by the authority. Ysgol Borthyn has been identified as the most suitable alternative provision as it offers faith based English medium provision. There are surplus places within all of the identified possible alternative schools including Ysgol Gellifor, Rhos Street School and Ysgol Llanfair DC should parents wish to choose a provision other than Ysgol Borthyn.</p> <p>The new school building within the town of Ruthin is a replacement school building for Rhos Street School and not an entirely new provision. Information relating to outcomes and standards at the school has been included within the formal consultation document.</p>
<p>2J Parental Choice</p>	<p>7 respondents raised this issue</p>
<p>Parental Choice: Closing the school takes away parental right to choose; Parents should have a choice between large town schools or small village schools. Closing down the village schools takes away this choice; without Llanbedr there would be no English medium faith school in a village location</p>	<p>The authority acknowledges that there are a number of factors that determine where parents end their child/children. However, local authorities are unable to maintain all schools in the current financial climate especially where there are significant surplus places within the system. Should the proposal be implemented there will still be a mix of provision within the Ruthin area including rural, town, faith and language provision.</p>
<p>2K Local Development Plan</p>	<p>62 respondents raised this issue</p>
<p>Local Development Plan: Once the new housing development has been built as this will bring more young families in to the area; with no local school the area will not be as popular with developers, without a school the houses will not sell so well; the impact of the LDP does not seem to have been considered thoroughly in the consultation and the fact that a school will be a requirement for a number of families who will inevitably move in to the village with the new housing; If the council are building new homes in Llanbedr any children will need a school; where will all the new children go if you are filling up other schools to capacity; New buildings in the village would change the demographics overnight- influx of families would require there to be a local school</p>	<p>The Council calculate how many additional pupils would be generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no. of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020.</p> <p>There is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision. As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.</p>

2L Faith Provision	57 respondents raised this issue
<p>Faith Provision: <i>Potential loss of a faith school discriminates against faith; close links with the Church; demand for two faith English medium schools in the area; There is clear demand for English medium faith education in the Ruthin area based on pupil numbers and pupil projections for Ysgol Llanbedr and Borthyn;</i></p> <p><i>There is not enough capacity in other church schools to accommodate the projected pupils. Denbighshire County Council would be significantly reducing Church school places if they proceed with the proposal; This is about the availability of faith-based education. Ysgol Llanbedr is the only faith school in the area with access to the curriculum in English; A church school education benefits pupils and other stakeholders in so many ways and there is not enough capacity in other church schools in the area to accommodate the pupils. The closure of this school would not be in the best interests of pupils, staff, parents and local community; want my children to learn the strong Christian values taught in the school; I am aware of the demand for education in a church school and of the wonderful atmosphere to be found in church schools. In closing this school the number of places in church schools would be significantly reduced and I do not believe that this is the best interests of our community; link with the church is not offered by any other school in the area; Families wanting English medium faith education for their children would not be able to attend such a school; Christian ethos at Ysgol Llanbedr</i></p>	<p>The alternative school, Ysgol Borthyn, provides a faith based education. The authority recognises the importance of faith based provision within education. Parents who wish for their child/children to attend a faith based English medium provision will be able to continue to do so.</p> <p>At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school.</p> <p>Ysgol Borthyn is also a Church in Wales primary school, this would provide pupils with continuity in faith based provision should the current proposal be implemented. Should the current proposal be implemented there would be scope for Ysgol Borthyn to extend links with the local church, St Peters, in Llanbedr DC.</p> <p>Estyn commented that "daily acts of collective worship and close links with the local church provide pupils with valuable opportunities to reflect on spiritual and moral issues" and that "links with the local church enrich pupils' spiritual experiences". Furthermore that "the school's partnership with Llanfwrog Church helps pupils to make good progress with their spiritual development. There are weekly visits by the rector to assembly and classes, and pupils perform services in the church on religious festivals. These, plus school visits to places of worship, such as St Asaph Cathedral, support the religious education syllabus well."</p>
2M Pupil Numbers/Surplus Places	44 respondents raised this issue
<p>Pupil Numbers/Surplus Places: <i>Ysgol Llanbedr is a growing school; Pupil registrations for Nursery and Reception have increased; Surplus places have never been an issue for Ysgol Llanbedr until 2011-2012. Due to the isolated traumatic events of 2011-12 the school now finds itself with a high level of</i></p>	<p>The authority has acknowledged that there will be an increase in pupil numbers at Ysgol Llanbedr. This is contained within the formal consultation document. However, surplus places will still remain within the school and within provision in the wider Ruthin area. The table below displays current surplus places at all faith based provision within the Ruthin area as of September 2015;</p>

<p>surplus places; decline in numbers nothing to do with excellent education it provides but the mis-handling of a leadership issue by DCC; looking forward to 2015 – 2016 and beyond the level of surplus places will quickly reduce to acceptable levels; Why close Llanbedr when surplus places target has been met?</p>	<table border="1"> <thead> <tr> <th>School</th> <th>Full Time Surplus Places</th> </tr> </thead> <tbody> <tr> <td>Ysgol Llanbedr</td> <td>22*</td> </tr> <tr> <td>Ysgol Borthyn</td> <td>26</td> </tr> <tr> <td>Ysgol Llanfair DC</td> <td>23</td> </tr> <tr> <td>Total</td> <td>71</td> </tr> </tbody> </table>	School	Full Time Surplus Places	Ysgol Llanbedr	22*	Ysgol Borthyn	26	Ysgol Llanfair DC	23	Total	71
School	Full Time Surplus Places										
Ysgol Llanbedr	22*										
Ysgol Borthyn	26										
Ysgol Llanfair DC	23										
Total	71										
<p>2N Financial Issues</p> <p>Financial Issues: It is managing its budget unlike most other schools in the authority; The cost per pupil at Ysgol Llanbedr is coming down and is due to return to the Ruthin average within two years; The council estimate they will save £126,000 by closing Ysgol Llanbedr. We expect the actual savings to be virtually nothing; The cost of providing school transport to the alternative school significantly reduces any savings; submitted a proposal to further reduce costs and federate with another church school which would mean your preferred option to close us down would actually be more expensive when you take in to consideration the thousands of pounds you would need to spend in transport; The school is the lowest cost to the council as it is church owned, the council have no capital gain from closing Llanbedr as it belongs to the church; A need to invest in extra accommodation, need to invest more in SEN support, staff redundancy and decommission the site; Llanbedr is good or better value for money and should be allowed to continue.</p>	<p>*Capacity of Ysgol Llanbedr to increase to 77 September 2016</p> <p>The quantum of pupils has remained static in the Ruthin area for a number of years, this is forecast to continue with no marked increase in birth rates within the area.</p> <p>61 respondents raised this issue</p> <p>Based on the current budget it has estimated that £126k would be retained centrally should the current proposal be implemented. Pupil led funding would follow pupils to an alternative provision. Additionally there would be an annual revenue saving of £4k with the removal of the mobile classroom. The transport costs that could be generated should the current proposal be implemented have been estimated at £26k. This would result in an overall net saving £104k.</p> <p>Due to the availability of alternative school places within the area there is no requirement for significant remodelling or refurbishment at any of the proposed alternative schools should the proposal be implemented. ALN support would be provided in line with the individual needs of the pupil. The proposal would not generate additional costs associated with ALN.</p>										
<p>2O Alternative Options</p> <p>Alternative Options: The Diocese's proposals for VA status and federation are sound and should be considered by DCC; these changes will reduce costs for DCC AND maintain schools in village communities. Should the Diocese proposal be accepted then the council could have a school it doesn't own and that would be enhanced and</p>	<p>76 respondents raised this issue</p> <p>Federated models have been established by the authority in areas of the county, the local authority has explored the option of Federation for Ysgol Llanbedr, the advantages and disadvantages of all alternative options were detailed within the formal consultation document. The authority broadly agrees with the benefits put forward in relation to federated school models however there are other issues, such as surplus places, fairer and more equitable distribution of school funding and greater</p>										

<p><i>developed at no cost to the council; as VA school building work is funded by Welsh government, the Diocese and the school; I have not been consulted or asked for my opinion about alternative options for the school, just given the option of closure yet again; why has the council not worked with the Diocese to make these ideas a reality rather than dismiss without consideration?</i></p>	<p>efficiency and effectiveness of the school estate. These issues were detailed at the outset of the Ruthin are review of primary education. It is the view of the authority that whilst federation outcomes would realise some benefits such as stability of leadership, pupils access to a broader compliment of staff etc. these same benefits can also be realised through the option to close Ysgol Llanbedr whilst also providing economies of scale for the benefit of all pupils within the area.</p> <p>As stated by the Diocese and also the Governing Body of Ysgol Llanbedr in their response to the consultation there are potential teaching, learning and educational experience enhancement opportunities for pupils. Options for sharing best practice and the pooling of resources can be achieved in a federated model however these benefits can also be achieved at a single site school. For example, Ysgol Borthyn the proposed alternative school, has a broad compliment of staff with an established senior leadership and middle management teams. The authority remains of the view that whilst these benefits can be realised in a federation the proposal to close Ysgol Llanbedr and transfer existing pupils to Ysgol Borthyn where pupils will have access to a broader compliment of teaching staff, curriculum leads and established leadership teams.</p> <p>In a federated arrangement Ysgol Llanbedr will still remain a small school, surplus capacity will remain and likely increase as of September 2016 due to a revised capacity assessment at the request of the school and Governing Body. The authority acknowledges that there will be an increase in pupils however there is not a general increase in the numbers of pupils across the Ruthin area indicating that the quantum of pupils will not change. Birth rates and pupil numbers have remained static for a number of years. The efficiencies and economies of scale that can be achieved by transferring pupils to Ysgol Borthyn with a sustainable number of pupils, single governance and established leadership structures will provide better use of resource and provide pupils with a broad range of learning and development experiences and opportunities.</p> <p>The authority remains of the view that in light of the benefits that can be realised through federation (and these benefits were detailed within the formal consultation document) and light of the availability of alternative provision within the area.</p>
<p>2P Small Schools/Small Classes</p>	<p>21 respondents raised this issue</p>

Small Schools/Classes: Whilst the council tries to find evidence that small schools do not perform as well as larger schools, both Estyn and Ofsted have issued reports that demonstrate that small schools achieve at least as well as larger schools; we did not want them to be in classes of 28-32 children; we chose a small school as we knew it would best suit our child's development; Ofsted recommended a place for small schools in national provision because of academic achievements and contribution to local communities; small schools achieve just as well as larger schools- Estyn and Ofsted

There are advantages to small class sizes, but there are also advantages for the pupil in an age appropriate class. Due to the current pupil numbers at Ysgol Llanbedr pupils are taught according to their key stage i.e. foundation phase class and key stage 2 class. The average pupil teacher ratio in primary schools across the UK in 2012-2013 was 20.5 for primary schools¹. The table below displays the pupil teacher ratios in the identified alternative schools;

School	Ratio
Ysgol Llanbedr	9.8
Ysgol Borthyn	15.4
Rhos Street School	18.5
Ysgol Gellifor	18.2
Ysgol Bro Famau	13.9
Ysgol Rhewl	15
Ysgol Llanfair DC	12.9

*Data for academic year 2013/2014

The authority acknowledges that whilst parents may choose smaller school this does not necessarily correlate to smaller classes as pupils will likely be taught in mixed age groups often spanning whole key stages as a consequence of school funding restrictions, as is currently the case at Ysgol Llanbedr. This places pressures on teaching staff who face greater challenges in small schools when catering for a wider age range often encompassing an entire key stage. Head teachers are also likely to have a substantial teaching commitment, as is currently the case at Ysgol Llanbedr, which can lessen the time they can devote to leadership and management of the school.

2Q Ysgol Llanbedr School Site & Buildings- Future Use

Llanbedr Site: What would be the future of the premises (Ysgol Llanbedr); school buildings held in trust by the Diocese so should the school close it will not be possible to use it for the different ideas in the consultation document

2 respondents raised this issue

In other instances where school buildings and sites have been subject to a reverter under Charity Commission Law, Denbighshire have worked with third parties, such as the Church in Wales Diocese of St Asaph to seek to retain the use of the building for the community, for example in Bryneglwys following the closure of the site and establishment of Ysgol Dyffryn Ial on one site.

Should the proposal be implemented the Council would facilitate discussions with the local community and the Diocese of St Asaph should they wish to seek to retain all or part of the building and/or site for community use.

2R head teacher Recruitment

head teacher recruitment: council will not appoint a permanent head

1 respondent raised this issue

The Governing Body of any school are able to advertise and appoint a head teacher. School organisation

<i>teacher, had it been advertised would have had a permanent head- could not be advertised due consultation on closure</i>	proposals and related consultations and processes do not restrict Governing Bodies in terms of recruitment.
2S Additional Learning Needs/SEN	3 respondents raised this issue
ALN: <i>additional 1-2-1 needs, how would this be dealt with and what level of quality/provision would there be at the new school? attainment of ALN pupils could not be achieved in another school</i>	<p>Pupils with ALN that currently receive support, either in the form of 1-2-1 or other support arrangements would see this support replicated within their new environment.</p> <p>The authority recognises the support that ALN pupils receive at Ysgol Llanbedr and this support would continue in Ysgol Borthyn. Estyn commented that the provision at Ysgol Borthyn for pupils with ALN was good and that teachers identify pupils' needs quickly and put in place appropriate support.</p>

END

=====

DRAFT

Appendix F

Issues Raised by the Diocese of St. Asaph

Ref.	Issue Raised	Response/Point of Clarification
Section 2: Development of School Organisation Proposals		
2.4	<p>The Diocese believes that going to a second consultation proposing to close Ysgol Llanbedr is definitely NOT in the best interests of the learners. They have been put under emotional and psychological pressure which impacts on their parents and carers.</p> <p>The Diocese is so concerned that this matter has been referred to the Children's Commissioner who will be meeting the children in the new term to ascertain the impact the consultation has had on them.</p> <p>The authority has provided no psychological assessment or evidence to state that a second consultation will NOT negatively impact on learners.</p>	<p>The Children's Commissioner and the authority have been in dialogue regarding the consultation. The authority would ask that the findings are made known to the authority and the decision makers (Cabinet members).The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response.</p> <p>The authority, in conjunction with the Governing Body of Ysgol Llanbedr DC, facilitated a consultation session for the pupils of Ysgol Llanbedr which allowed them to put forward their views on the proposal. This is set out in Appendix C.</p> <p>Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p>

<p>2.5</p>	<p>Ysgol Llanbedr (the site and buildings) is subject to charitable interest- the school has a reverter therefore according to Charity Commission law the property reverts back to its previous owner when it stops being a school. Hence it cannot be used to help fund the Modernising Education Programme. As defined in DCC policy 10- Future Use of Surplus Assets:</p> <p>“Where a school site is closed, the following approach will be taken:</p> <p>1. If the site is owned by the Church in Wales, Roman Catholic Church or Trust, the future use of the site and building will be a matter for the church or organisation concerned, in consultation with the local community. The County Council would not want to take on any additional assets because it faces significant challenges in maintaining its core assets. If there were a desire for buildings to be retained for community use, this would be a matter for the local town or community council or other community organisations to pursue and fund”</p> <p>This provides the misleading assumption that there is the potential for the community to retain the school for community use. This is not the case, hence the community will lose a valuable facility.</p> <p>Policy 10 also states;</p> <p>“Disposal of sites that are being closed will form a key part of the funding package. Any receipts generated will be reinvested in the Modernisation of Education provision.”</p> <p>As the site is not owned by DCC this benefit from closing a</p>	<p>The authority is aware that the school site is subject to a reverter and has not claimed that the release of the Ysgol Llanbedr DC site and building would result in a capital receipt which would be re-invested into the Modernising Education Programme. The authority does not believe that the content of the policy is misleading. In other instances where school buildings and sites have been subject to a reverter under Charity Commission Law, Denbighshire have worked with third parties, such as the Church in Wales Diocese to seek to retain the use of the building for the community, for example in Bryneglwys following the closure of the site and establishment of Ysgol Dyffryn Ial on one site. Should the proposal be implemented the Council would facilitate discussions with the local community and the Diocese of St Asaph should they wish to seek to retain all or part of the building and/or site for community use.</p> <p>The authority would not pursue proposals to close any school based solely on financial gains such as capital receipts. In some instances this can be a residual benefit however the educational aspects of a proposal can outweigh such financial benefits and must be the primary concern.</p>
-------------------	---	---

	school cannot be realised, unlike if a community school was closed.	
Section 3: Background to the Proposal		
3.4	If Ysgol Llanbedr were to become a VA school, it would remove some of the burden for improvement and modernisation from DCC.	<p>If the status of Ysgol Llanbedr changed from VC to VA the school budget would be calculated in the same way as other schools (community, VC etc.). The difference would be under premises allocation for maintenance. Although VA schools do remove some financial responsibility from the local authority they would still receive 75% of a repairs budget and 15% of additional repairs budget.</p> <p>Taking the school budget for Ysgol Llanbedr 2015/2016 and applying the above would have resulted in a total saving to the overall delegated budget of £453. The Council is aware of funding opportunities for VA schools and their respective Diocesan authorities to seek 85% funding from the Welsh Government towards improvement works to the schools. In considering any proposal for the school to become a VA school the authority would need assurances from the Governing Body and the Diocesan Authority regarding their financial capacity to fund the remaining 15% of such works for this to be seen as a real benefit.</p>
3.5	<p>“The needs of learners are a priority for the Council...” But what about the psychological damage for the learners in having to face the closure of their school not once, but twice with the second closure proposal coming only a week after they believed the school was safe following on from the Ministers determination letter where he stated that he must “reject the proposal”.</p> <p>Officers from MET announced on the 3rd of Feb that the decision to go back to Cabinet to restart consultation had been made. This means that officers and elected</p>	<p>The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response which is set out in Appendix C. Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support</p>

	<p>members took 5 days to consider carefully, seek legal advice and determine that this was the best course of action. We believe that 5 days was not enough time to make this decision in a measured and considered way and was a knee jerk reaction to the Ministers rejection of the original proposal.</p>	<p>officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p> <p>The authority did not announce a second consultation for closure 5 days following the issuing of the decision by the Minister for Education and Skills on the 27th January 2015. The report taken to Cabinet on the 17th of February 2015 was to inform Cabinet members of the Ministers decision and to set out the recommendations within the determination letter. In this report it was recommended that a consultation take place with the Church in Wales Diocese of St Asaph regarding the future of Ysgol Llanbedr. This took place between the 20th of April 2015 and the 18th of May. Representatives from the Diocese of St Asaph and the Governing Body were included within pre-Cabinet briefing meetings during this period and presented an alternative proposal to be considered by members. A decision to formally consult on the proposal to close was not taken by Cabinet until 2nd June 2015 providing adequate time for the Council to evaluate the Ministers recommendations.</p>
<p>3.8</p>	<p>Ysgol Llanbedr has a potential federation partner which comes under model (d) of policy 1 of DCC's Modernising Education Policy Framework. Education Small Schools Order 2014 attached in supporting documents.</p> <p>Federation provides an opportunity for smaller schools to remain open in their communities and to take advantage of the benefits federation can offer in terms of sharing expertise, good practice and resources for the benefit of all schools in the federation. Evidence suggests that federation can be beneficial in terms of improving the</p>	<p>The local authority has explored the option of Federation for Ysgol Llanbedr, the advantages and disadvantages of all alternative options were detailed within the formal consultation document. The authority broadly agrees with the benefits put forward in relation to federated school models however there are other issues, such as surplus places, fairer and more equitable distribution of school funding and greater efficiency and effectiveness of the school estate. These issues were detailed at the outset of the Ruthin are review of primary education. It is the view of the authority that whilst federation outcomes would realise</p>

quality and range of educational provision and can make schools more efficient financially.

The ultimate aim of federations should be to improve educational outcomes of pupils. However, federating small school is likely to result in some cost savings for local authorities. Small schools that are federated should also benefit from potential cost savings as the federation beds down. Evidence from schools that have federated show there are clear advantages and savings that can be achieved.

Annex 9 of the UK Department for Children, Schools and Families Report (now the Department for Education) issued in September 2009 evidence some of the financial savings from the case studies of small rural primary schools federating. Based on shared headships at that time the estimated savings on head teachers salaries ranged from a net minimum of £12,000-£54,530 depending on variables such as the pay point and salary scale of the heads, the position will be even more beneficial 6 years later.

some benefits such as stability of leadership, pupils access to a broader compliment of staff etc. these same benefits can also be realised through the option to close Ysgol Llanbedr whilst also providing economies of scale for the benefit of all pupils within the area.

As stated by the Diocese and also the Governing Body of Ysgol Llanbedr in their response to the consultation there are potential teaching, learning and educational experience enhancement opportunities for pupils. Options for sharing best practice and the pooling of resources can be achieved in a federated model however these benefits can also be achieved at a single site school. For example, Ysgol Borthyn the proposed alternative school has a broad compliment of staff with an established senior leadership and middle management teams. The authority remains of the view that whilst these benefits can be realised in a federation the proposal to close Ysgol Llanbedr and transfer existing pupils to Ysgol Borthyn where pupils will have access to a broader compliment of teaching staff, curriculum leads and established leadership teams.

In a federated arrangement Ysgol Llanbedr will still remain a small school, surplus capacity will remain and likely increase as of September 2016 due to a revised capacity assessment at the request of the school and Governing Body. The authority acknowledges that there will be an increase in pupils however there is not a general increase in the numbers of pupils across the Ruthin area indicating that the quantum of pupils will not change. Birth rates and pupil numbers have remained static for a number of years. The efficiencies and economies of scale that can be achieved by transferring pupils to Ysgol Borthyn with a sustainable

		<p>number of pupils, single governance and established leadership structures will provide better use of resource and provide pupils with a broad range of learning and development experiences and opportunities.</p> <p>The authority remains of the view that in light of the benefits that can be realised through federation (and these benefits were detailed within the formal consultation document) and light of the availability of alternative provision within the area.</p>
3.15	<p>What about the short term and midterm implications for the learners at Ysgol Llanbedr from having their school under the threat of closure twice in a three year period. This sustained threat has undermined morale within both the school and wider community, whilst strengthening their resolve to keep Ysgol Llanbedr open.</p>	<p>This is noted and the authority would re-iterate that they have made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response which is set out in Appendix C of this formal consultation report pack. Further information relating to arrangements for pupils can be found in section 2.4.</p>
Section 4: What is the Proposal?		
4.1	<p>Since the original Ruthin review numbers on roll at both Ysgol Llanbedr and Ysgol Borthyn have increased. Borthyn now has 137 pupils on roll, with a capacity of 142, meaning there are only 5 places available in the school. Llanbedr now has 28 pupils on roll (23 full time and 11 nursery) therefore not all pupils at Llanbedr could transfer to Borthyn (contrary to the Ministers view).</p> <p>This then removes the parental preference from this proposal as if all parents chose to send their children to Ysgol Borthyn this would not be possible. Section 1.4 of the Code- need for places and the impact on accessibility of schools is included.</p>	<p>As of September 2015 there were 32 Full Time pupils in Ysgol Llanbedr and 4 Part Time pupils. The current capacity of Llanbedr is 54 (this will increase to 77 as of September 2016 however a flexible admission number is currently being applied) which results in 22 surplus places equating to 40.7% of the total capacity. As of September 2015 there were 116 Full Time pupils at Ysgol Borthyn and 14 Part Time pupils. The current capacity of Borthyn is 142 which results in 26 surplus places equating to 18.3% of the total capacity. Part time (nursery places) are not included within the full time pupil capacity and are calculated separately. The table below provides current numbers of pupils on roll as of September for both Ysgol Borthyn and Ysgol Llanbedr;</p>

	N	R	1	2	3	4	5	6
YL	4	10	7	3	7	2	3	0
YB	14	18	22	19	11	13	16	17
T	18	28	29	22	18	15	19	17

**N&R admission data as of September 2015.*

Should the proposal be implemented and all full time pupils transfer to Ysgol Borthyn this would result in a total of 148 full time pupils. Ysgol Borthyn has accommodated full time pupil numbers greater than 142 full time pupils in the past. Within the capacity assessment there is potential accommodation for 23 further full time pupils at Ysgol Borthyn. As demonstrated should all pupils transfer to Ysgol Llanbedr the pupils could be accommodated within the current class structures and would not exceed 30 pupils per class. There is also further faith provision within the Ruthin area, Ysgol Llanfair DC which has a capacity of 113 with 23 surplus places as of September 2015. Ysgol Llanfair DC is a Category 2 dual stream provision. Further information relating to the categorisation can be found in section 5.3.

The Council recognises that pupil numbers in Ysgol Llanbedr will increase over the coming years and this data has been contained within the pupil forecasts data within the consultation document. The authority remains of the view that these pupils coming through the system can be accommodated at Ysgol Borthyn within existing class structures going forward and the reduction in capacity within the English medium faith based primary sector would not result in parental choice being removed.

4.4

DCC's stated aim is to reduce primary school capacity in

The Council calculate how many additional pupils would be

<p>the Ruthin area from 1213 to 1050 full time places (informal consultation document). DCC has already taken steps to achieve this aim. Current work and other consultations if carried through will bring capacity down to the desired target. All projections point to pupil numbers increasing over the next 5 years. Ysgol Llanbedr has registered interest indicating an increase on roll, should its future be secured. Through the work of the Ruthin Review the following outcomes are planned:</p> <ul style="list-style-type: none"> -Closure of Ysgol Rhewl reduces capacity by 82. -Merging Llanfair and Pentrecelyn reduces capacity by 29. -The rebuild at Glasdir reduces capacity by 20. <p>This takes the capacity number to 1058 which is only 8 pupils over DCC target figure. Also the figure of 23 quoted for Ysgol Llanbedr in 2014/2015 relates to full time pupils.</p> <p>Based on interest shown and numbers in nursery and munchkins the school expect this to increase to 33 full time pupils for 2015/2016. This reduces surplus capacity from 57.4% to 38.9% a reduction of 18.5% in just one year and this is in spite of the fact the school is under the threat of closure. Should the threat be removed the pupil numbers would grow much more quickly. Incidentally the pupil numbers at Ysgol Borthyn are growing so there would be insufficient capacity there for Ysgol Borthyn and Ysgol Llanbedr pupils.</p> <p>Based on current numbers in both munchkins and playgroup we can forecast school numbers as follows;</p>	<p>generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24. Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula.</p> <p>In addition should new properties be completed there is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision.</p> <p>As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.</p> <p>As set out in the table above no class size would exceed 30 pupils should all current FT pupils transfer to Ysgol Borthyn. The authority remain of the view that additional spend at Ysgol Borthyn, or any other school in the area, would not be required as a result of the proposal being implemented.</p> <p>Works recommended as per the FRA are scheduled to take place however this was not achieved by March 2015. The FRA works will be undertaken by the end of April 2016 at the latest.</p> <p>Pupil projections for Rhos Street School which will relocate to</p>
---	--

	15/16	16/17	17/18	18/19
FT	35	40	45	50
N	6	8	8	8*
Total	41	48	53	58

*based on trend

These figures do not take into account the pupils who had intended to join Ysgol Llanbedr before the decision was made by the Minister.

Llanbedr is now bottom heavy with numbers. The renewed growth of pupil numbers at Llanbedr must be taken into account. "The Local Authority has identified a decrease in live birth in the area" Ministers letter. 70 new homes within the LDP and 17 extra pupils of primary age. Option of mobile accommodation at Borthyn cannot be condoned under DCC policy 6. The current head teacher at Ysgol Borthyn considers that if the children at Ysgol Llanbedr were to transfer to Ysgol Borthyn she would have no option but to use the mobile provision on site as classroom space.

The reception class will be 33 which is over the infant class size limit, therefore the class will need to be split which will either lead to pupils taught in mixed aged groups (which negates one of the benefits of pupils moving to Ysgol Borthyn) or additional teaching resource and classroom space required with the inevitable cost implications.

Either way the evidence shows that this proposal cannot proceed without either requiring investment into the building at Ysgol Borthyn which the authority already said is not possible in the MET "Review of Primary School

the Glasdir site have been included within the consultation document. Forecasts for Ysgol Pen Barras have not been included as it is a Category 1 Welsh medium school, it is reasonable to assume parents that are currently attending Ysgol Borthyn for faith and language preference and therefore it is unlikely that Ysgol Pen Barras will absorb any pupils from the area.

Ysgol Borthyn provides an English medium faith based provision for the town of Ruthin. The number of pupils within the area and the process of admissions will ensure that an equity between pupil numbers at Rhos Street and Ysgol Borthyn will be carefully managed whilst maintaining parental preference.

The Council have acknowledged the issues surrounding leadership at Ysgol Llanbedr and this is contained within the consultation document.

The Council calculate how many additional pupils would be generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no. of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020.

As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending

Provision in the Ruthin Area, Ruthin Town Schools Brief" dated June 2013. But also that there is no available funding or plans to undertake the immediate works to Ysgol Borthyn. Works to be completed by March 2015 still outstanding.

The Diocese feel that the relocation of Ysgol Pen Barras and Ysgol Rhos Street to a site 0.4 miles from Borthyn will necessarily impact directly on the schools future and therefore needs due consideration. The authority have not produced any trend data to show predicted numbers at Borthyn and the new Glasdir school for the next 6 years or show what impact this will have on any learners who will transfer from Ysgol Llanbedr.

By combining the numbers on roll at Ysgol Llanbedr and Ysgol Borthyn as of Jan 2015 it can be seen that the full time NOR will be 150 pupils. This is over the capacity of 142 without even taking into account numbers in nursery. This gives the school a deficit not a surplus of places.

Estyn's current guidance for the inspection of local authority education services for children and young people states "Inspectors should judge whether there is enough capacity in both primary and secondary sectors, including Welsh medium and special education, and whether any school is significantly over filled or has significant surplus capacity WITHOUT GOOD REASON".

In 2011/2012 the head teacher at Ysgol Llanbedr went on sick leave and was replaced with a covering head from DCC. It was as a result of this imposed leadership that a large number of pupils left the school. The Diocese

Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr. It is reasonable to conclude that not all pupils that may be generated as a result of the developments would attend Ysgol Llanbedr.

	believes this is GOOD REASON for the sudden surplus capacity- which incidentally is now reducing year on year despite the constant threat of closure. The consultation document does not show any material difference from the original proposal.	
4.6	Pupil projections increase in both Ysgol Llanbedr and Ysgol Borthyn. Even DCC figures show an increase in both schools. The proposal to close Ysgol Llanbedr would reduce the number of English medium faith based places by 77 (based on increased capacity at Ysgol Llanbedr in 2016/2017) leaving only 142 in the Ruthin area (capacity at Borthyn). This 35% drop in English medium faith based primary places. Figures show this is less than the number of places required which will be 150 in September 2015.	<p>The figures in the consultation document suggest that based on known admission data as of May 2015 pupil numbers will increase at Ysgol Llanbedr and remain constant at Ysgol Borthyn. However, the overall demand for English Medium education in the area is likely to decrease further. The increase in pupil numbers at Ysgol Llanbedr can be mainly absorbed within the existing class structures at Ysgol Borthyn whilst maintaining class sizes of under 30 pupils.</p> <p>Other faith based provision exists within the wider Ruthin area which would provide an English medium provision. The Church in Wales as a co-promoter with Denbighshire have recently published a statutory notice to establish a new Church in Wales area school to serve Llanfair and Pentrecelyn as a dual stream school at which pupils may be educated through the Medium of English as per the offer described in the categorisation of schools. At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school.</p>
4.7	DCC LDP suggests 70 new homes in Llanbedr and 17 extra pupils of primary age. This does not show possible	The Council calculate how many additional pupils would be generated should homes under the LDP be implemented

	<p>movements into the area. Also the projected decrease is in Rhos Street and Ysgol Gellifor not in the faith schools.</p> <p>The narrative shows 4 live births in Llanbedr/Llangynhafal in 2012 but the table shows 21- which is it? This is contradictory and misleading. We ask for specific clarification and response on this point.</p>	<p>using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no. of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020.</p> <p>There is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision. As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.</p> <p>There is an error within the table- the live birth rate for the Llanbedr area is 4 (as contained within the narrative). The 21 live births should be located alongside the Llanarmon area for the corresponding period. This, however, does not impact on the overall totals of live births for 2012 as this still identifies an overall decrease in the birth rate within the area indicated and therefore is not misleading and still provides a true representation of birth data.</p>
<p>4.10</p>	<p>What was the response to this consultation? No data has been provided in this document. There is no research to show how reducing surplus places improves outcomes. We would ask for specific responses to these and other queries raised within this response.</p>	<p>The response to the informal consultation period was considered by Cabinet in June 2013. Where surplus places exist, resource is directed away from the learner. The average cost of a surplus place within the primary sector is around £260 (Estyn, May 2012). The removal of surplus places</p>

allows this resource to be directed back to the learner, primarily for teaching and learning purposes which impacts positively on standards and outcomes for the learner.

4.13

Based on current numbers in both Munchkins and Playgroup we can forecast Ysgol Llanbedr school numbers as follows;

	2015/2016	2016/2017	2017/2018	2018/2019
Full Time Pupils	35	40	45	50
Nursery	6	8	8	8
TOTAL	41	48	53	58

*figure based on trend

These figures do not take into account the children who had intended to join Ysgol Llanbedr before the decision by the Minister. If these were included the forecast numbers would be even greater. Incidentally Ysgol Borthyn (the proposed school for Ysgol Llanbedr students should it close) is also growing so there would be insufficient capacity there for Ysgol Borthyn and Ysgol Llanbedr pupils.

By combining the numbers on roll at Ysgol Llanbedr and Ysgol Borthyn as of Jan 2015 it can be seen that the full time NOR will be 150 pupils. This is over the capacity of 142 without even taking into account numbers in Nursery. This gives the school a deficit (not a surplus!) of places of 6%.

Full Time NOR- Ysgol Llanbedr & Ysgol Borthyn Combined

As of September 2015 the numbers of pupils registered at Ysgol Llanbedr and Ysgol Borthyn by class are displayed below;

	N	R	1	2	3	4	5	6
YL	4	10	7	3	7	2	3	0
YB	14	18	22	19	11	13	16	17
T	18	28	29	22	18	15	19	17

*N&R admission data as of September 2015.

Should the current part time pupils transition to Reception in September 2016 this would increase the full time pupils at Ysgol Llanbedr from 32 to 36. The capacity of Ysgol Llanbedr will increase from 54 to 77 as of September 2016, this would equate to a surplus of 53.2% as of September 2016. Should all current part time pupils at Ysgol Borthyn transition to Reception in 2016 there would be 113 full time pupils at Ysgol Borthyn in September 2016 equating to 20.4% of the overall capacity. This would result in a total of 70 surplus places across both schools equating to 31.9% of the total capacity.

Historically, pupil's numbers at Ysgol Borthyn have been greater than 150. There is additional area within the school which could be utilised to accommodate 23 full time pupils as identified within the schools capacity assessment.

as of September 2015							
Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
33	29	20	17	15	18	18	150

Section 5: Benefits, Disadvantages and Risks of the Proposal	
<p>5.1</p> <p>Benefit 1: The authority has not produced any evidence to support this. We would request that the authority adduce meaningful evidence to support how they have come to this conclusion with specific regard to Ysgol Llanbedr and Ysgol Borthyn. We believe that the consultation document is once again flawed in that generalised statements are being made with no statistical evidence or research provided to allow consultees to consider the matter with all the evidence needed to make an informed decision.</p> <p>The current support category for Ysgol Borthyn is AMBER whereas the current support category for Ysgol Llanbedr is YELLOW. The Code makes clear what a local authority must do with regard to the nomination of any receiving school. Ysgol Borthyn is a good school but the authority has not considered how the influx of so many pupils will put added pressure on the school and affect current standards of education.</p>	<p>As part of their response to the consultation having considered the content of the consultation report, Estyn concluded that the proposal is likely to at least maintain the current standards of education in the area based on the information and data provided within the consultation document. The authority included a range of data and statistical information within the consultation document relating to outcomes and standards at Ysgol Llanbedr and Ysgol Borthyn. This included contextualised data at both Foundation Phase and Key Stage 2. Data for other schools in the area has also been included within the consultation document.</p> <p>Estyn in their response commented that the proposer {DCC} had provided a useful range of information relating to performance outcomes. These include local, national and the family of schools who have similar levels of free school meal entitlement. Furthermore consultation appropriately raises the challenges facing small primary schools in being able to implement leadership structures effectively. The proposer acknowledges that in small primary schools, many head teachers have a significant teaching responsibility. This limits the time they can devote to leading and managing and they have fewer opportunities to evaluate standards and to drive improvement.</p> <p>Furthermore Estyn stated that the proposer {DCC} had appropriately considered the impact of the proposal on</p>

		pupil outcomes, provision and leadership and management. Estyn stated a useful range of information relating to performance outcomes. Although Ysgol Borthyn is classified as amber and Ysgol Llanbedr as Yellow the overall weighting for the two schools is similar with Ysgol Borthyn at 16.5 and Ysgol Llanbedr at 16. There is a similar picture at both schools. The Council is of the view that this has been considered and is contained within section 7 of the consultation document which provides an assessment of the impact of the proposal on the quality of educational provision should the proposal be implemented.
5.1	Benefit 2: Proposal would reduce the number of English medium faith based places by 77 (based on increased capacity at Ysgol Llanbedr in 2016/2017), leaving only 142 in the Ruthin area. Figures show this is less than the number of places required which will be 150 in September 2015.	At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school.
5.1	Benefit 3: The authority has not produced any evidence to show that this would improve the educational outcomes of the schools under review or those schools who would receive additional pupils if these proposals were implemented. The consultation document does not show how the authority would invest in any of these receiving schools. No investment is planned into Ysgol Borthyn. It is not acceptable for the authority to make generalised remarks on possible future investment. This consultation document should have had a detailed feasibility into the planned investment into Ysgol Borthyn showing how the redistribution of funds would benefit learners there, and	The proposal would result in a more equal distribution of funding within the area. The reduction in surplus places would allow funding to be released and re-distributed more directly to the benefit of the learner. Elements of the school budget that are pupil led would follow the pupil to their new provision should the proposal be implemented. Should all pupils transfer to Ysgol Borthyn this would result in an increase in Ysgol Borthyn's budget of £86k (based on the current budget 2015/2016). This would result in per pupil funding of approximately £4,058, the Denbighshire average is £3,931. Pupil led funding allows the schools to ensure there is sufficient resource for the pupils. The authority remains of the view that should the proposal

	<p>what is planned to improve facilities. We would request that the authority adduces evidence that they have considered this as part of the current consultation and would ask why these documents were not included in the consultation documents which would support these contentions. We believe that the consultation document is once again flawed in that statements are being made with no statistical evidence or research provided to allow consultees to consider the matter with all the evidence needed to make an informed decision. Sets out section 1.5 of the Code.</p> <p>Consultation document does not give the depth of information to allow respondees to fully consider how the requirements of the code will be met by this proposal. There is no detail on recurrent funding, additional transport costs, necessary costs to improve facilities at Ysgol Borthyn, consideration of the loss of the value of the Llanbedr site or the cost of the status quo if surplus places at Ysgol Llanbedr continue to fall and the potential savings of a federation.</p>	<p>be implemented there would be no detrimental impact on the standard of the facilities at Ysgol Borthyn in light of its suitability rating. The authority has invested a total of £36k in revenue and £62k in capital to improve facilities in Ysgol Borthyn since 2010. The Council will also be undertaking further works as per the FRA recommendations which will be completed by April 2016. It is the view of the authority that there is no requirement for further significant works at the school should the current proposal be implemented.</p> <p>The authority has provided information relating to recurrent costs (such as an annual revenue saving from mobile rental) and has detailed the transport costs should the proposal be implemented.</p>
5.1	<p>Benefit 4: This is not accurate. There would be a loss of resource as the Church School site would be lost with no recompense due to the reverter clause.</p>	<p>The comment was reflecting on the reduction of maintenance requirements on the school estate. The Council notes the potential loss of an asset to the Church in Wales should the proposal be implemented.</p>
5.1	<p>Benefit 5: The cost of closing Ysgol Llanbedr when scrutinised against the additional costs not listed is negated. The consultation document does not list the costs of redundancy for staff, it does not include the costs of removing the mobile and making good of the site it sits on, neither does it include the stripping out of the building or repairs necessary before it can be handed back to the</p>	<p>Significant costs have not been incurred by the Council in instances of building and land disposal previously. The Chief Finance Officer statement stated "The costs around the statutory processes are not significant and will be contained within existing resource". A previous CiW school closure resulted in total costs of £1,267 following closure of the school building (inclusive of contractor work). These costs</p>

	<p>Diocese. It does not include the legal costs associated with the closure, no assessment has been made of the insurance costs of an empty building. It does not include the value of the loss of the site to the authority. Must return in an agreed state of repair.</p> <p>Any asbestos will need to be removed, the commercial kitchen equipment stripped out- no costs listed. These are significant costs that have not been assessed and agreed. Members should be given a full breakdown of the costs- legal- facilities- electrical- and specialists that need to be incurred should the proposal be implemented. No assessment of additional costs incurred at Ysgol Borthyn- inevitable costs that will not be met by pupil led funding.</p> <p>We would ask for a full and comprehensive breakdown of all potential additional costs. Members have also not been given full information regarding financial projections for Denbighshire schools. Llanbedr will be one of only 12 still projecting a surplus in 2017/2018. No financial sense to close.</p>	<p>are not significant and would be absorbed within existing resources.</p> <p>The authority reiterates there will be no requirement for additional capital spend at Ysgol Borthyn as the proposed receiving school. There are other issues which the authority believes outweigh these concerns such as the safeguarding of educational standards within the wider Ruthin area, surplus places and leadership issues. It is the view of the authority that the proposal, if implemented, will lead to the greater efficiency and economies of scale to the benefit of all learners within the area. The authority is aware that the school is not in a financial deficit.</p>
<p>5.2</p>	<p>Disadvantage 1: Would be a loss of 77 English medium faith based primary places. 35% drop in English medium places- not just affecting Llanbedr but wider Ruthin area.</p>	<p>At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school. Additionally, there are options for a permanent extension to the building should demand necessitate.</p>

		<p>Should the current part time pupils transition to Reception in September 2016 this would increase the full time pupils at Ysgol Llanbedr from 32 to 36. The capacity of Ysgol Llanbedr will increase from 54 to 77 as of September 2016, this would equate to a surplus of 53.2% as of September 2016. Should all current part time pupils at Ysgol Borthyn transition to Reception in 2016 there would be 113 full time pupils at Ysgol Borthyn in September 2016 equating to 20.4% of the overall capacity. This would result in a total of 70 surplus places across both schools equating to 31.9% of the total capacity across both schools.</p>
5.2	<p>Disadvantage 2: Could lead to parents having to make difficult decision to send children to non-faith school to minimise effects of longer journey. Removes parental preference. Authority has a duty to provide faith based places if a parent requests it.</p>	<p>21 pupils currently attending Ysgol Llanbedr have home locations that are closer to Ysgol Borthyn which will reduce the home to school journey for these pupils. Pupils living in the Llanbedr area (11 pupils) would have an increased journey time to school, however due to the proximity of Llanbedr to the town of Ruthin this would be within the guidelines set out by the Welsh Government in relation to learner travel.</p> <p>Should the proposal be implemented parents who wish to access faith based English medium provision can continue to do so. The Council is unable to sustain every school within the Ruthin area in light of further financial constraints. The Council has endeavoured to ensure that parental choice is maintained within the Ruthin area with a mix of rural, town, community and faith based provision available. The Council recognise that some parents may want to choose other provision than the named alternative school and have included information relating to educational performance, Estyn comment and other comparative information within the consultation document for consultees.</p>
5.2	<p>Disadvantage 3: Cost implication to redundancy or even</p>	<p>Any school re-organisation process could result in staff</p>

	<p>redeployment.</p>	<p>redundancy. Should the proposal be implemented and Ysgol Llanbedr was to close staff would cease to be employed at the school. The Council would work closely with individual members of staff and the relevant trade unions to secure alternative employment for staff as part of the re-deployment process. In previous cases of school closures within Denbighshire redundancies have been minimal with the majority of staff re-deployed.</p> <p>Costs for support from HR are absorbed by the SLA and would not reduce the proposed savings. Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as redeployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff. All members of staff have been offered support by HR and a member of the HR team has visited the school during the consultation period.</p>
5.3	<p>Risk Management 1: Additional transport costs £26k. Current transport costs at Ysgol Llanbedr £0.</p>	<p>There is a minimal cost of transport associated with current pupils travelling to Ysgol Llanbedr although this is not zero. The majority of pupils attending Ysgol Llanbedr have nearer suitable schools, such as Ysgol Borthyn, therefore are not currently eligible for home to school transport.</p>
5.3	<p>Risk Management 2: Numbers have increased at Llanbedr and Borthyn. The proposed new area school in Llanfair DC is not an alternative as language designation is Category 2.If Ysgol Llanbedr should close there are not enough English medium faith based primary places available.</p>	<p>Ysgol Llanfair DC is a Category 2 school. Category 2 schools are dual stream schools. These schools provide Welsh medium and English medium side by side dependent upon parental preference. If they choose Welsh medium the delivery language of the pupil's education, the language of communication with the pupil and educational assessments is in Welsh- the same as Category 1 schools. If parents choose for their child to be educated through the medium of English, the curriculum is delivered in English, the communication language with the child is in English and any</p>

		assessments are done in English- the same as a Category 5 school.																											
5.3	<p>Risk Management 3: Authority has not produced any evidence to show what the costs of this would be (staff redundancy/redeployment). We would request that the authority adduce evidence to support this. Flawed in that statements are being made with no statistical evidence.</p> <p>The school has been under threat since 2013 and in that time HR have visited once; there has been no assistance to staff throughout the process either from HR or Occupational Health. Clear breach of a duty of care to staff that have not been supported.</p>	Please see the response as set out in 5.2.																											
5.3	<p>Risk Management 4: Costs included relating to federation resulting in a saving of £12,028.</p> <p>Closure option costs;</p> <table border="1"> <thead> <tr> <th>Closure Option</th> <th>Income</th> <th>Expenditure</th> </tr> </thead> <tbody> <tr> <td>Capital/School Budget Savings</td> <td>£126,000.00</td> <td></td> </tr> <tr> <td>Head teacher salary</td> <td></td> <td></td> </tr> <tr> <td>Revenue Savings</td> <td>£4,656.00</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td>Transport</td> <td></td> <td>£26,600</td> </tr> <tr> <td>Redundancy</td> <td></td> <td>£43,230.77</td> </tr> <tr> <td>Additional SEN 1-2-1 needs</td> <td></td> <td>£16,000.00</td> </tr> <tr> <td>Extra mobile at</td> <td></td> <td>£5,000</td> </tr> </tbody> </table>	Closure Option	Income	Expenditure	Capital/School Budget Savings	£126,000.00		Head teacher salary			Revenue Savings	£4,656.00					Transport		£26,600	Redundancy		£43,230.77	Additional SEN 1-2-1 needs		£16,000.00	Extra mobile at		£5,000	<p>Any school re-organisation process could result in staff redundancy. However the council would actively seek re-deployment as a preferred option for staff. In previous cases of school closures within Denbighshire redundancies have been minimal with the majority of staff re-deployed.</p> <p>Costs for support from HR are absorbed by the SLA and would not reduce the proposed savings. Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as redeployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff.</p> <p>The authority would re-iterate there is no requirement for an additional mobile classroom at Ysgol Borthyn should the current proposal be implemented and no capital investment would be required in Ysgol Borthyn or any other alternative school in the area. The authority note that there</p>
Closure Option	Income	Expenditure																											
Capital/School Budget Savings	£126,000.00																												
Head teacher salary																													
Revenue Savings	£4,656.00																												
Transport		£26,600																											
Redundancy		£43,230.77																											
Additional SEN 1-2-1 needs		£16,000.00																											
Extra mobile at		£5,000																											

	<table border="1"> <tr> <td>Borthyn</td> <td></td> <td></td> </tr> <tr> <td>Loss of Llanbedr site</td> <td></td> <td>£250,000</td> </tr> <tr> <td>Business Support</td> <td></td> <td>£20,054.00</td> </tr> <tr> <td>Increased staffing at Ysgol Borthyn</td> <td></td> <td>£16,000.00</td> </tr> <tr> <td>Totals</td> <td>£130,656.00</td> <td>£376,884.77</td> </tr> </table>	Borthyn			Loss of Llanbedr site		£250,000	Business Support		£20,054.00	Increased staffing at Ysgol Borthyn		£16,000.00	Totals	£130,656.00	£376,884.77		<p>would be an asset loss should the current proposal be implemented. The authority would not pursue proposals to close any school based solely on financial gains such as capital receipts. In some instances this can be a residual benefit however educational aspects of proposal can outweigh such financial benefits and must be the primary concern.</p> <p>It is unlikely that the proposal would result in an additional £20,054 for business support. This figure was provided during the pre-consultation stage following a request for further information from the Diocese relating to savings made within the school budget. The proposal would result in a business support saving (not an additional expenditure) of £20,054 which forms part of the overall total school budget saving (non-pupil led funding).</p>
Borthyn																		
Loss of Llanbedr site		£250,000																
Business Support		£20,054.00																
Increased staffing at Ysgol Borthyn		£16,000.00																
Totals	£130,656.00	£376,884.77																
<p>5.3</p>	<p>Risk Management 5: The Modernising Education Team did not hold parents meetings or offer any new parents the opportunity to speak to officers or to visit Ysgol Borthyn. Section 3.4 of the Code is set out. By not meeting authority has failed to consult in an open and transparent way which would allow parents to discuss their concerns.</p> <p>The Diocese believe that the authority is using the proposal as a means to promote its own community provision and thereby help reduce their surplus places. Ignoring the parental preference for a rural English medium faith based provision.</p>	<p>The Code does not make it mandatory for the authority to carry out meetings with parents and received no request from parents, the Governing Body or other stakeholders during the consultation period for such meetings. Should the proposal be implemented the Council would work with individual parents and pupils based on their preference for alternative provision. This would include transitional opportunities for pupils (i.e. taster days) and opportunities for parents to visit schools such as Ysgol Borthyn.</p> <p>The Council refute the comment that the proposal is trying to 'promote' community schools at the expense of faith. The Council as of 1st September implemented the proposal to re-designate Ysgol Esgob Morgan in St Asaph as a Voluntary Controlled School and is working with the Church in Wales for the new Area school for Llanfair / Pentrecelyn to be a Voluntary Controlled School and seeking to establish a new</p>																

<p>5.5</p>	<p>It appears the only benefit is the reduction of surplus places- disadvantages are as follows;</p> <ul style="list-style-type: none"> -Loss of 35% English medium faith school places within Ruthin area. -Impact on viability of village hall. -Incompatible school support category between Ysgol Llanbedr and Ysgol Borthyn. 	<p>secondary joint faith provision in the North of the County.</p> <p>The authority has been clear from the outset of the review that surplus places were a key driver to safeguarding the quality and standard of education in the Ruthin area. A number of responses have identified how well utilised the village hall is throughout the week. It is the view of the authority that the hall would continue to be sustainable should the proposal be implemented. The authority has addressed the concern around categorisation of both Ysgol Borthyn and Ysgol Llanbedr. Both schools are currently in Standards category 3, there is a similar picture at both schools.</p>
<p>5.7</p>	<p>The Diocese believes that the consultation is once again in reality on only one option. There is no evidence to suggest that DCC has seriously considered other alternative proposals either as solutions other than a closure or as to why Llanbedr should be singled out for closure rather than other possible schools. The authority has not produced any evidence to support the claim that a number of options have been considered. We would request that the authority adduce evidence- we would expect to see copies of internal reports, research undertaken by officers, questions on federation, amalg or maintain the status quo.</p> <p>We would expect to see a risk benefit analysis and proper business case examining the alternatives showing how officers came to an informed decision. Consultation flawed by not providing this. Proposal is opportunistic and remains potentially discriminatory. No alternatives consider due to time from Ministers determination- not at a formative stage as Code requires.</p>	<p>The Council have set out a number of options for Ysgol Llanbedr which includes the advantages and disadvantages of each option and how each option meets the key drivers for the review. This has been contained within the consultation document. The authority has consulted on closure as it believes that closure would achieve the following;</p> <ul style="list-style-type: none"> ▪ Pupils would have access to an equivalent provision in terms of standards and outcomes, language medium and faith provision; ▪ Pupils would benefit from exposure to a broader compliment of teaching staff, senior leaders and curriculum leads; ▪ A reduction in surplus places would occur whilst maintaining provision for parental preference; ▪ Would lead to more balanced and equitable funding between mainstream schools in the area including a more balanced per pupil spend; ▪ Resource would be re-directed to the learner and teaching provision.

		<p>The Diocese and Governing Body were invited to present their option for federation during the consultation with the Diocese. Benefits of Federation and a change of status that have been put forward by the Diocese and Governing Body were similar to the advantages detailed within the formal consultation document such as;</p> <ul style="list-style-type: none"> ▪ Ysgol Llanbedr would be retained; ▪ Some maintenance and administrative costs would be transferred; ▪ Ysgol Llanbedr would have a permanent head teacher providing an opportunity to strengthen leadership and management and result in a head teacher salary saving; ▪ Greater opportunity to share resource, best practice and staff expertise; ▪ Pupils would have access to a broader compliment of staff. <p>In determining a way forward full consideration was given to the alternative options such as federation, maintaining the status quo, amalgamation/area school, change of status have been explored by the authority. The advantages and disadvantages of these options are detailed within the formal consultation document.</p>
<p>Section 6: What will be the impact of the proposals on the Quality and Standards in Education?</p>		
<p>6.1</p>	<p>Ysgol Llanbedr has strongly embedded values and a distinctive Christian ethos, and even though it is a VC school due to parental request it follows the church in</p>	<p>Should the current proposal be implemented the local authority would work with the regional educational consortia, the Diocese and the proposed receiving school,</p>

	wales denominational syllabus and not the LA agreed syllabus for RE which is followed at Ysgol Borthyn. Therefore pupils transferring to Ysgol Borthyn will not receive equivalent teaching in RE. Not possible for Borthyn to make this change without the agreement of parents, must be a request from parents with no outside influence.	Ysgol Borthyn during a transitional period. Should pupils transfer to Ysgol Borthyn, parents who have requested for pupils to follow the Church in Wales denominational syllabus would be able to submit a similar request. Ysgol Borthyn is a Church In Wales Voluntary Controlled school, as is Ysgol Llanbedr. The current support that is provided to Ysgol Llanbedr to implement and monitor the denominational syllabus by the Diocese could be replicated within Ysgol Borthyn due to its Church in Wales status.
6.4	According to AA route planner the distance between Ysgol Llanbedr and Ysgol Borthyn is 3.3miles and not 2.2 miles as stated by DCC. This emphasises that the consultation document is poorly drafted and has basic flaws that should have been amended prior to publication.	The location of Ysgol Llanbedr on 'AA Route Planner' is inaccurately located. The Council utilise Ishare GIS software to calculate distances between sites based which shows the distance between the two school sites to be 2.6 miles. The reference to 2.2miles within the document is for the village of Llanbedr, the school sits outside of the village itself. Pupil journey times resulting from the proposal will fall within the requirements set out in Welsh Government guidelines for learner travel times.
6.5	Shows the drop in numbers which we have continually argued is due to the Council handling of the temporary head teacher arrangements.	Support was provided to the school and Governing Body. Solutions to the issues were reached in mutual agreement. Ysgol Llanbedr received extensive support from the school improvement team which saw pupil numbers stabilise.
6.10	Ysgol Borthyn has a higher than average ALN proportion of pupils. These pupils require additional support staff. Ysgol Llanbedr has 5 pupils. Will place extra strain on capacity will lead to a detriment in the quality of educational provision. Also noted in 6.11 and 6.26	The support for pupils with ALN in Ysgol Borthyn is already in place. Should the proposal be implemented support packages for the individual pupils currently in Ysgol Llanbedr will be replicated in their new learning environment and appropriate transitional arrangements for the individual pupils needs will be arranged should the proposal be implemented. ALN officers would work closely with individual families and pupils.
6.22	Although numbers in cohorts relatively small the	The authority would re-iterate that where cohorts are small in

	consistency of outcomes shows that Ysgol Llanbedr provides excellent educational provision. Additionally noted in 6.27	number outcomes should be treated with caution. This is advice is replicated by the Welsh Government on the "My Local School" website. The authority has provided a range of contextualised data relating to both schools to demonstrate this.
6.29	The Diocese has had confirmation that had a permanent head teacher position been advertised for at Llanbedr and had the school not been under threat of closure a previous acting head teacher would have applied. Position Llanbedr has been put in by the LEA.	Ysgol Llanbedr could advertise for a permanent head teacher. The advice not to recruit for a permanent head teacher was issued during 2011-2012 when there were leadership issues at the school.
Section 7: Evaluation of the Impact of the Proposal on the Quality and Standard of Education		
7.1	<p>The well-being of learners has not been considered as their school has now been under the threat of closure twice in a three year period. With regard to standards, the current support category for Ysgol Borthyn is Amber. The current support category for Ysgol Llanbedr is Yellow. Does not meet threshold requirements of school org code.</p> <p>Provision- Diocese believes that Ysgol Llanbedr continues to provide an excellent education as is demonstrated by the consistently good outcomes. However to continually improve Ysgol Llanbedr has identified potential partners for federation. Benefits of Federation are numerous.</p>	<p>The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response. The authority, in conjunction with the Governing Body of Ysgol Llanbedr DC, facilitated a consultation session for the pupils of Ysgol Llanbedr which allowed them to put forward their views on the proposal. This is also set out in detail in Appendix C.</p> <p>Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p>
7.2	Notes different support categories. Ysgol Borthyn is a good school but the authority has not considered how the influx	The LA has responded to the concerns around the categorisation of Ysgol Borthyn and Ysgol Llanbedr in

	<p>of so many pupils will put added pressure on the school and affect the current standards of education. The other alternative schools in the area do not provide an English medium faith based education and as such are NOT alternatives. Parental preference would be removed as children would be forced to go to either bilingual faith based schools. Parental preference removed and children forced to go to either bilingual faith schools or non-faith based English medium schools.</p> <p>Failed to ensure that disruption to learners is minimised by second consultation on school closure.</p>	<p>section 7.7. The authority has undertaken an evaluation of the impact of the proposal on the quality and standard of education which was detailed in Section 7 of the formal consultation document. The authority addressed the potential impact of the proposal on;</p> <ul style="list-style-type: none"> ▪ outcomes :- standards, wellbeing, curriculum delivery; ▪ provision :- learning experiences, teaching, care support, guidance and learning environment; ▪ leadership and management :- leadership, improving quality, partnership working and resource management. <p>The authority have included an assessment of potential other alternatives in the area in addition to Ysgol Borthyn as the proposed receiving school. Ysgol Borthyn, and other schools within the area, would continue to provide all pupils with a broad and balanced curriculum at both the foundation phase and key stage 2 without detriment as a consequence of the proposal.</p>
7.5	<p>Ysgol Llanbedr follow the Church in Wales syllabus for RE. This is not the case at Ysgol Borthyn or the other alternative schools. The receiving schools would not be able to provide the same curriculum should they receive pupils as a result of the proposed closure of Ysgol Llanbedr. Authority does not provide evidence to support the statement that other schools would be able to continue to deliver the curriculum. If all pupils moved to Llanbedr the infant class size would be over the legal limit of 30. This would impact on Ysgol Borthyn's ability to deliver the curriculum.</p>	<p>This is detailed within the formal consultation document (Section 7). There are surplus places within each of the identified schools, as of September 2015 there were 204 surplus places across all identified schools (inclusive of Ysgol Llanbedr) equating to 41.5% of the overall capacity of the schools.</p>
7.6	<p>Other alternative schools not alternatives do not provide faith education.</p>	<p>The School Organisation Code states that <i>"information should be included for all existing schools likely to be</i></p>

		<p><i>affected by the proposal- for example in the case of a proposal to close a school information should be provided about all the surrounding schools to which it might reasonably be considered that pupils may wish to transfer”.</i></p> <p>The proposed alternative school, Ysgol Borthyn, provides an alternative faith based English medium provision. In addition, it would be deemed reasonable that other schools in the area may be impacted should the proposal be implemented. Identified alternative provision includes faith based and non-faith based provision. A broad range of information relating to each of the schools has been included within the formal consultation document including educational outcomes, standards, Estyn comments and data regarding past, present and future pupil numbers.</p> <p>Some responses to the formal consultation have expressed wishes for other schools other than Ysgol Borthyn. Additionally, of those pupils who left Ysgol Llanbedr between 2011 and 2013 none attended an alternative faith based provision. Therefore it is reasonable that parents of current pupils may seek a non-faith option in accordance with parental preference and consultees have been provided with information relating to these schools in accordance with the Code.</p>
7.7	<p>Ysgol Borthyn is in improvement category C whilst Ysgol Llanbedr is in improvement category B, whilst both schools are working well Ysgol Llanbedr is in a stronger position in terms of its improvement capacity.</p>	<p>Both Ysgol Llanbedr and Ysgol Borthyn are in standards group 3 as per the national schools categorisation system. The overall weighted scores for the schools are also similar with Ysgol Llanbedr having an overall weighted score of 16.5 and Ysgol Borthyn 16. The picture at both schools is similar. The authority does not agree that Ysgol Llanbedr is in a stronger position than Ysgol Borthyn and would maintain the view that there is an improving picture at both schools.</p>

7.8	<p>Importance of a school within a village community and parental involvement which is better within small schools.</p>	<p>The authority acknowledges that school closure will inevitably impact upon a community. The authority produced a Community and Welsh Language Impact Assessment which was published alongside the formal consultation document. It is recognised by the authority that the school plays an important role in the community, should the proposal be implemented there would be scope to extend links with Ysgol Borthyn and the Llanbedr DC community. There is a separate village hall located within Llanbedr which is utilised for events in the village. The school does not have a hall facility however the astro-turf pitch is used by the wider community. The authority would be open to working with the Diocese and local community to retain use of the facility for the local community. The authority has provided a response to the issues raised within the community impact assessment in section two of this table.</p>
7.9	<p>Ysgol Llanbedr and Diocese have proposed federation. Consultation report gives two weak lines saying that federation was considered but gives consultees no adequate reasons for not pursuing this.</p> <p>The authority asked the Diocese of St Asaph to bring forward alternative proposals. We strongly contend that under the Code it was and is the absolute duty of the authority to consider fully all alternatives and bring forward proposals on a number of possible options. All alternatives should have formed part of this consultation. By limiting the consultation to the only outcome of closure the authority effectively limited the responses and the information gathering process that would have allowed elected members to hear from the wider community on a range of alternatives.</p>	<p>The Council has set out disadvantages and advantages of Federation within the consultation document. The Council have considered not only this information but also information presented by the Diocese of St Asaph and the Governing Body of Ysgol Llanbedr.</p> <p>There is no requirement within the Code for local authorities to consult on more than one option. Should a local authority consult on only one option they must outline why other alternative options have been discounted. This information has been contained within the formal consultation document. A large volume of responses have been received and the authority would disagree that this limited responses to the consultation. The range of issues raised by respondents is set out in this formal consultation report.</p>
7.12	<p>Provision: Difference in support category re-iterated. Ysgol</p>	<p>Both Ysgol Borthyn and Ysgol Llanbedr are in standards</p>

	<p>Borthyn has a higher than average % of ALN pupils. These pupils require additional support staff. Ysgol Llanbedr has 4 pupils with ALN, and 1 with support.</p> <p>Already higher than average will put immeasurable pressure on the capacity of the building and will inevitably lead to a detriment in the quality of educational provision. No consideration has been given in the consultation document, which again we submit as a significant flaw.</p> <p>Forecasts show insufficient places, this would mean using mobile accommodation. No scope left to extend Borthyn due to access restrictions at the site not feasible option. The authority fails to provide details of how support currently received by individual pupils would be replicated.</p>	<p>category 3. The overall weighted scores at both schools are similar with Ysgol Llanbedr having an overall score of 16 and Ysgol Borthyn 16.5. There is a similar picture at both schools.</p> <p>The resources for ALN support would be reviewed in accordance with pupil movement. However there is no reason to believe that the higher than average ALN percentile at Ysgol Borthyn has an impact on the quality of educational delivery at the school.</p> <p>The feasibility work has identified potential to expand Ysgol Borthyn and following an assessment by the Property Health and Safety Manager the authority is of the view that there is safe access to expand the school should demand increase. Work has been undertaken to extend other schools in the county were access has been restricted to a greater extent than that at Ysgol Borthyn.</p>
<p>7.13</p>	<p>Authority fails to provide evidence as to how possible shortcomings of small schools in terms if wider opportunities in respect of curricular and extra-curricular activities relates directly to Ysgol Llanbedr. Any possible benefits due to a larger cohort of pupils can be alleviated by following through on the proposal to federate. Estyn states it differs from school to school and given Ysgol Llanbedr consistently good outcomes this shows shortcomings are not present at Ysgol Llanbedr.</p>	<p>The consultation document was based on the proposal of closure and compared the position of closure against the status quo. The Council welcomes the diocesan view that alternative options than the status quo would lead to a better educational experience for current pupils.</p>
<p>7.14</p>	<p>It is the authority's belief that Ysgol Borthyn is LIKELY to offer a broader compliment of staff and have an established structure for curriculum leads however fail to provide any evidence to this effect. Increase in pupils re-iterated. Therefore information provided by the authority from the Estyn report 2013 is misleading and irrelevant. Numbers forecast to grow to 50 by 2018/2019.</p>	<p>Ysgol Borthyn has a permanent head teacher with no teaching commitment, an established senior leadership team and a middle management team. The school also has a number of curriculum leads with staff having expertise in a number of areas. This information was contained within the formal consultation document. In comparison to the status quo at Ysgol Llanbedr which currently has FTE of 2 teaching</p>

		<p>staff, one of whom is the head teacher with a significant teaching commitment, it is reasonable to conclude that should the proposal be implemented pupils would have access to a broader compliment of staff.</p> <p>The authority does not believe that the inclusion of the Estyn 2013 report is misleading or irrelevant. Ysgol Llanbedr will remain a small school. A small school is defined by Estyn as any school with 90 pupils or fewer; there are currently 32 full time pupils on roll. The current capacity of Ysgol Llanbedr is 54 with an increase to 77 as of September 2016. It is expected there will be 36 full time pupils on roll as of September 2016 should all 4 current part time pupils transition to Reception. Very small schools are defined as 30 pupils or fewer and this was applied to Ysgol Llanbedr at the time of publication (22 Full time pupils January 2015) although it is recognised that the school currently (September 2015) has 32 full time pupils on roll.</p>
<p>7.21</p>	<p>There is no evidence from the authority to back up their claim that their proposal would offer at least an equivalent standard of leadership and management.</p> <p>The Diocese proposal to federate would provide an equivalent standard as well as stability. Current consultation unfairly discriminates against the school in seeking opportunities to develop further federation proposals as the consultation and decision of Cabinet could effectively remove Ysgol Llanbedr as a viable partner.</p>	<p>The Council set out the rationale for the educational case for change within the document alongside comparative and contextualised data and information for Ysgol Llanbedr, Ysgol Borthyn and the other possible alternative schools within the area. Ysgol Borthyn has appointed a permanent head teacher who took up post in January 2015. Prior to this the deputy head teacher was acting head for one term following the retirement of the previous Head in July 2014. The school, due to its size, has an established senior leadership team unlike at Ysgol Llanbedr which is restricted in terms of staff due to budgetary restrictions. As recognised by Estyn, it is less challenging for larger schools to implement senior leadership and middle management teams as the school budget formula allows for a greater staffing body than at a smaller school.</p>

7.23	The authority fails to recognise that it was as a result of the imposed leadership that a large number of pupils left the school leading to the sudden surplus capacity- which is now reducing. Ysgol Llanbedr was graded 4 in 2009 prior to the issues arising in 2011-2012. Since school leadership and current acting head teacher with support from GWE have greatly improved the school's self-evaluation processes.	The authority refute that the leadership arrangements were 'imposed'. Support was provided to the school and Governing Body. Solutions to the issues were reached in mutual agreement. Ysgol Llanbedr received extensive support from the school improvement team which saw pupil numbers stabilise.
7.24	The authority only provide a "view" that should current pupils of Ysgol Llanbedr transfer to Ysgol Borthyn it would not have a negative impact on the quality of leadership and management at Ysgol Borthyn. No evidence is provided to substantiate this view. We would ask for specific evidence to support this. No assessment on the impact on the Head teachers well-being has been made. Proposing a large number of children to attend the school. Unfair expectation of any head teacher and teaching staff. Authority provides view it would positively impact on pupils- no evidence is provided to support this ambitious claim. Pupils could access a broader compliment of teaching staff offering expertise through federation. Same benefit without upheaval of moving schools.	Ysgol Borthyn, due to the size of the school, has a broader compliment of teaching staff than at Ysgol Llanbedr. This includes staff with expertise in various areas of the curriculum who act as curriculum leads. The school has an established senior leadership team and a substantive head teacher with no teaching commitment.
Section 8: Alternative Provision		
8.1	Alternative schools- not alternative do not provide faith. On what basis is the statement that parents/pupils may wish to choose a school other than Ysgol Borthyn? Parents at Llanbedr have consistently stated that they wish to send their children to a faith school. Relying on fact they may not choose Borthyn- not an adequate rationale. We would seek clarification as to why the authority are proposing Borthyn but stating that parents may wish to choose another school.	The School Organisation Code states that " <i>information should be included for all existing schools likely to be affected by the proposal- for example in the case of a proposal to close a school information should be provided about all the surrounding schools to which it might reasonably considered that pupils may wish to transfer</i> ". The proposed alternative school, Ysgol Borthyn, provides an alternative faith based English medium provision. In addition, it would be deemed reasonable that other schools in the area may be impacted should the proposal be

		<p>implemented. Identified alternative provision includes faith based and non-faith based provision. A broad range of information relating to each of the schools has been included within the formal consultation document including educational outcomes, standards, Estyn comments and data regarding past, present and future pupil numbers.</p> <p>Some responses to the formal consultation have expressed wishes for other schools other than Ysgol Borthyn. Additionally, of those pupils who left Ysgol Llanbedr between 2011 and 2013 none attended an alternative faith based provision. Therefore it is reasonable that parents of current pupils may seek a non-faith option in accordance with parental preference and consultees have been provided with information relating to these schools in accordance with the Code.</p>
<p>8.4</p>	<p>Authority does not provide 5 year forecasts of pupil rolls at all existing schools likely to be affected. Information should be provided by EC Harris surveys only not other surveys.</p>	<p>The 5 year forecasts for all possible alternative schools are included in section 4 (4.6-4.7) of the formal consultation document. The School Organisation Code states that the EC Harris surveys undertaken in 2010 should be included within the formal consultation document, however it does not state this should be the only information used to compare the accommodation of schools.</p> <p>The EC Harris surveys were undertaken in 2010, the authority believes that it was reasonable to include additional information that provided a more recent view regarding the quality of accommodation. There has been works at both schools since this time with a maintenance revenue spend of £31k and a capital maintenance spend of £43k at Ysgol Llanbedr since 2010. At Ysgol Borthyn there has been a maintenance revenue spend of £36k and a capital maintenance spend of £62k at Ysgol Borthyn for the same period.</p> <p>Based on the investment made the internal survey</p>

		information has also been included in addition to the EC Harris surveys to provide a comprehensive comparison of the quality of accommodation at both schools.
8.5	Why does the authority bring two sets of contrasting data to advise consultees? Serves no purpose but to make comparative less clear and does not show which set is being used by authority to make final decision. Another flaw in document.	The authority provided an explanatory note regarding the two sets of pupil forecasts. The first table is based purely on actual pupils (January PLASC data) and the second table uses this same data but updates with the most recent admissions for Nursery and Reception.
8.6	What date is this based on? Consultation document is flawed as it does not give a date or by what method it was calculated.	The capacities of each school are calculated in line with the Measuring the Capacity of Schools in Wales 2011 Circular No: 021/2011. The capacities included within the table are the most recent calculations for the schools listed. Further information relating to the measurement of school capacities can be found on the Welsh Government website here .
8.8	What date is this based on? Consultation document is flawed as it does not give a date or by what method it was calculated. Two methodologies used. Authority should have an agreed methodology.	Section 8.8 of the consultation document is in reference to pupil teacher ratios The authority assume the methodology queried is the pupil projections methodology. The methodology for the calculations of pupil forecasts does not differ for the two sets of data; however one set is based on the PLASC numbers only whereas the second set provides an updated forecast using the most recent admissions data available. The methodology in both circumstances takes a 3 year average from the Nursery, Reception and Year 1 class to provide a trend number to roll forward. Actuals within the system also roll forward.
8.10/11	Misleading as they give data and outcomes for schools that are either not church schools or are not in the same category as Llanbedr.	The School Organisation Code states that <i>"information should be included for all existing schools likely to be affected by the proposal- for example in the case of a proposal to close a school information should be provided about all the surrounding schools to which it might reasonably be considered that pupils may wish to transfer"</i> . The proposed alternative school, Ysgol Borthyn, provides an

		<p>alternative faith based English medium provision. In addition, it would be deemed reasonable that other schools in the area may be impacted should the proposal be implemented. Identified alternative provision includes faith based and non-faith based provision. A broad range of information relating to each of the schools has been included within the formal consultation document including educational outcomes, standards, Estyn comments and data regarding past, present and future pupil numbers.</p> <p>Some responses to the formal consultation have expressed wishes for other schools other than Ysgol Borthyn. Additionally, of those pupils who left Ysgol Llanbedr between 2011 and 2013 none attended an alternative faith based provision. Therefore it is reasonable that parents of current pupils may seek a non-faith option in accordance with parental preference and consultees have been provided with information relating to these schools in accordance with the Code.</p>
<p>Section 9: Adequacy of School Accommodation and Impact of the Proposal on the Quality of Accommodation</p>		
<p>9.1</p>	<p>Code states information to be used must include reference to 21st Century Schools survey and not any other survey. Yet has been ignored by the authority who adduces data from 2014 which is not relevant as the authority has not made significant investment in either school since 2010. Information is misleading and tries to convey that Ysgol Borthyn is better graded in suitability than Ysgol Llanbedr. Flawed consultation has information does not meet criteria.</p>	<p>The School Organisation Code states that the EC Harris surveys undertaken in 2010 should be included within the formal consultation document, however it does not state this should be the only information used to compare the accommodation of schools. The EC Harris surveys were undertaken in 2010, the authority believes that it was reasonable to include additional information that provided a more recent view regarding the quality of accommodation. There has been works at both schools since this time with a maintenance revenue spend of £31k and a capital maintenance spend of £43k at Ysgol Llanbedr since 2010. At Ysgol Borthyn there has been a maintenance revenue spend of £36k and a capital maintenance spend of £62k at Ysgol Borthyn for the same period.</p>

		Based on the investment made the internal survey information has also been included in addition to the EC Harris surveys to provide a comprehensive comparison of the quality of accommodation at both schools.																																				
9.3	Where is the evidence that Ysgol Borthyn can accommodate 23 full time pupils? Where would they go? What is the anticipated impact in each class? Why hasn't the authority changed the capacity number? head teacher of Ysgol Borthyn counters this view.	<p>The 'Measuring Capacity of Schools in Wales' methodology used by the authority demonstrates there is additional capacity within Ysgol Borthyn. There is a room area of 43sqm which would potentially provide 23 full time pupil places as per the measurement formula. Other classrooms within the building measure 41sqm and 42sqm.</p> <p>This room is presently allocated as resource space for the school but has previously been utilised as a teaching area.</p> <p>Should the proposal be implemented and all pupils of Ysgol Llanbedr transferred to Ysgol Borthyn the arrangements for teaching would be discussed closely with the Governing Body of Ysgol Borthyn. Based on current , and should all pupils of Ysgol Llanbedr transfer to Ysgol Borthyn, class structures would be as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>N</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>YL</td> <td>4</td> <td>10</td> <td>7</td> <td>3</td> <td>7</td> <td>2</td> <td>3</td> <td>0</td> </tr> <tr> <td>YB</td> <td>14</td> <td>18</td> <td>22</td> <td>19</td> <td>11</td> <td>13</td> <td>16</td> <td>17</td> </tr> <tr> <td>T</td> <td>18</td> <td>28</td> <td>29</td> <td>22</td> <td>18</td> <td>15</td> <td>19</td> <td>17</td> </tr> </tbody> </table> <p><i>*N&R admission data as of September 2015.</i> Data based on the January 2015 PLASC was presented within the formal consultation document demonstrating class structures for both Ysgol Llanbedr and Ysgol Borthyn.</p>		N	R	1	2	3	4	5	6	YL	4	10	7	3	7	2	3	0	YB	14	18	22	19	11	13	16	17	T	18	28	29	22	18	15	19	17
	N	R	1	2	3	4	5	6																														
YL	4	10	7	3	7	2	3	0																														
YB	14	18	22	19	11	13	16	17																														
T	18	28	29	22	18	15	19	17																														
9.5	The authority fails to mention the fact that Ysgol Llanbedr has an astro turf facility.	The astro-turf facility is included within the Community and Welsh Language Impact assessment. The authority would be																																				

		open to working with the Diocese and local community to retain use of the facility for the local community.
9.6	No evidence to back this up- no mention of the fact pupils from Ysgol Llanbedr would no longer have the provision of year round outdoor PE.	The authority has produced evidence relating to condition and suitability surveys at Ysgol Borthyn which indicate the school provides a good learning environment. Estyn also found the learning environment at Ysgol Borthyn to be good stating "The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well." Ysgol Borthyn has sufficient outdoor hardplay area which is utilised for outdoor activities year round. It is recognised that this is not an astro-turf facility however it would not impact on the pupils access to outdoor PE provision should the current proposal be implemented.
9.7	FRA Recommendations have not been met	The FRA (Fire Risk Assessment) works were not completed by the end of the financial year 2014/2015. These works have been factored into the capital programme for the coming financial year and the authority can confirm they will be completed by April 2016.
9.9	Very questionable how DCC can perceive Ysgol Borthyn to have a suitability rating of A- Good performing as intended and operating efficiently.	The School Organisation Code states that the EC Harris surveys undertaken in 2010 should be included within the formal consultation document, however it does not state this should be the only information used to compare the accommodation of schools. The EC Harris surveys were undertaken in 2010, the authority believes that it was reasonable to include additional information that provided a more recent view regarding the quality of accommodation. There has been works at both schools since this time with a maintenance revenue spend of £31k

		<p>and a capital maintenance spend of £43k at Ysgol Llanbedr since 2010. At Ysgol Borthyn there has been a maintenance revenue spend of £36k and a capital maintenance spend of £62k at Ysgol Borthyn for the same period.</p> <p>Based on the investment made the internal survey information has also been included in addition to the EC Harris surveys to provide a comprehensive comparison of the quality of accommodation at both schools. Estyn also found the learning environment at Ysgol Borthyn to be good stating "The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well."</p>
9.10	<p>It should be noted that the authority is not planning any investment into Ysgol Borthyn. Suitability rating of Ysgol Borthyn will not be improved by the proposal.</p>	<p>The Council have not stated that the suitability rating would be improved (this however is already good and graded A). It is the view of the authority that should the current proposal be implemented it would not negatively impact on the suitability of Ysgol Borthyn to continue to deliver the curriculum. There is no requirement for the proposal to improve the facilities at a receiving school unless there is good reason to do so. As evidenced investment has been made into Ysgol Borthyn and the condition and suitability of the learning environment is good. The school is currently operating below its capacity and additional area has been identified.</p>
<p>Section 10: What will be the impact of the proposal on the availability for school places of the same designated religious character?</p>		
10.3	<p>Not for the Diocese to bring forward proposals- it is for the authority to determine if it is a viable option before commencing consultation on closure. Authority failed to do this. It would have been appropriate for the authority to</p>	<p>In considering moving towards consultation on the proposal for closure the Cabinet report provided the view that "Should a decision be made to consult this would not preclude further work being undertaken by the Governing</p>

	consult on this proposal {to federate} so they could be certain all options had been fully explored. There is no information provided to enable respondees to this consultation to make an informed decision about the Diocesan proposal.	Body in partnership with the Diocese and Local Authority on developing more firm proposals regarding the options for federation." Subsequently the Council has worked with the Diocese to assist with this proposal. At the stage of publishing the consultation document no clear information had been provided by the Diocese or Governing Body in regard to alternative schools to which Ysgol Llanbedr would federate. The advantages and disadvantages of Federation have been provided within the consultation document and have been measured against the strategic drivers of the review. It is the view of the authority that although Federation would provide some benefits closure remains the preferred option which would safeguard and sustain current standards of education within the area and meet the key drivers review resulting in a reduction in surplus places, more equitable distribution of per pupil funding and lead to greater efficiency and effectiveness of the school estate.
10.6	Ysgol Llanfair DC does not provide an English medium faith based provision it is misleading to include them in the figures.	Ysgol Llanfair DC is a Category 2 school. Category 2 schools are dual stream schools. These schools provide Welsh medium and English medium side by side dependent upon parental preference. If they choose Welsh medium the delivery language of the pupils' education, the language of communication with the pupil and educational assessments is in Welsh- the same as Category 1 schools. If parents choose for their child to be educated through the medium of English, the curriculum is delivered in English, the communication language with the child is in English and any assessments are done in English- the same as a Category 5 school.
Section 11: What will be the impact of the proposal on financing of schools?		
11.1	Information is extremely misleading. Is inaccurate and therefore flawed as it presents the case that no extra	The authority maintains the view that there is no requirement to invest in the facilities at Ysgol Borthyn, or any other school

	money would be spent. Not the case and the costs have not been presented to cabinet.	in the area, should the proposal be implemented. The authority has explained within the consultation document that there is capacity within the system should the proposal be implemented.
11.3	Costs provided by Diocese on closure/savings and for Federation. Outlines financial benefits.	Federation would generate a head teacher saving, the Diocese and Governing Body have stated this would save in the region of £12k. However, there are other costs associated with establishing a Federation and the schools would continue to have distinctly separate budgets. Federated schools receive an additional £3k lump sum within their delegated budget (this is per individual school). Closure would generate a head teacher saving in addition to the non-pupil led funding elements of the school budget such as premises allowance, small schools grant and business support.
11.6	Based on evidence (costs) we do not believe there will be significant cost savings of £104k.	This view is noted however it is the view of the authority that closure would result in a saving and lead to a more equal distribution of school funding.
11.7	Cost per pupil will fall.	Where pupil numbers increase per pupil funding decreases, however Ysgol Llanbedr will remain a small school and although pupil numbers at the school are increasing it is unlikely per pupil funding will fall in line with the average cost in the near future.
11.10	The proposal to close Ysgol Llanbedr would reduce the number of English medium faith based places (based on increase in Sept 16 at Llanbedr to 77) leaving only 142 places in Ruthin area. Will be 150 in September 2015. NOT a more balanced and equitable dispersal of school funding as far as church places is concerned.	At the commencement of the Ruthin review in February 2013 24.8% of the overall capacity for the Ruthin area were faith places. If all proposals put forward as part of the review are adopted the overall total will be 26.8% although there will be an overall reduction of 20 places. There is potential capacity within Ysgol Borthyn (as per the capacity assessment) for a further 23 full time pupils places. Should it be required this space could be utilised within the school. Ysgol Llanfair DC is a Category 2 school. Category 2 schools are dual stream schools. These schools provide Welsh

		medium and English medium side by side dependent upon parental preference. If they choose Welsh medium the delivery language of the pupil's education, the language of communication with the pupil and educational assessments is in Welsh- the same as Category 1 schools. If parents choose for their child to be educated through the medium of English, the curriculum is delivered in English, the communication language with the child is in English and any assessments are done in English- the same as a Category 5 school.
11.12	There would be no capital gain from closing the school- unlike if a community school were to close.	The authority would not pursue proposals to close any school based solely on financial gains such as capital receipts from the sale of school buildings and or sites. In some instances this can be a residual benefit, however the educational aspects of a proposal can outweigh such financial benefits and must be the primary concern.
Section 12: What will be the impact of the proposal on the land and buildings of the school?		
12.12	Facility would be lost to the community. Munchkins would be at risk- village hall is not suitable. Lists reasons. Holiday club available to children during holidays. Schools site subject to reverter under Charity Commission Law.	Although the authority recognise that Munchkins@Llanbedr play an important role at the school it is not a statutory provision. The authority have stated that other options could be available to Munchkins@Llanbedr to continue providing their service. The Denbighshire County Council childcare sufficiency report (2014) noted that there were a total of 354 childcare places available in the Ruthin area. There were 258 children of 0-3 years of age in 2014 with 50% of childcare vacancies empty for this age range not taking into account 118 spaces within full day care private provision. The full day care provision in Ruthin has a daily capacity of 57% of the numbers it could cater for suggesting that there is more than adequate childcare options and places available within the area. Other full day child care is available in the Ruthin area. The authority notes concerns that 'munchkins' would not be viable without the school remaining open. It has been

		<p>proposed that the village hall would be suitable however consultees have stated that this would not be an option as the village hall is well utilised throughout the day and could not accommodate the facility. Other schools, including Ysgol Borthyn, have wrap-around-care available. Ysgol Borthyn offers 'Borthyn Bunnies' playgroup for pupils aged two and a half years and over for morning and afternoon sessions. Other schools within the area also offer similar wrap-around-care provision, breakfast clubS and after school club. Although the authority recognises the importance to parents of wrap-around-care it is important to note that this is not a statutory provision.</p>
<p>Section 13: What issues have been considered in developing the proposal?</p>		
<p>13.1</p>	<p>Alternative Options: There is no evidence to demonstrate that the Diocesan proposal has been given careful consideration. Immediate revisiting of option to close after Ministers decision indicates clearly no alternatives were or are under consideration. Hence the Diocese believes the proposals are not still at a formative stage in clear breach of the Code. No information provided on the strategies for school improvement or on the timetable for attaining a 21st Century schools standard.</p>	<p>The proposal from the Diocesan was presented to Cabinet members in person during May 2015. The issues arising were considered very carefully by elected members and officers before the report was finalised. A full response to the option to federate and change the status of Ysgol Llanbedr DC is contained within Appendix 1 of the Cabinet report pack which can be found here.</p>
<p>13.2</p>	<p>We have demonstrated that numbers are continuing to grow at Ysgol Llanbedr. We have shown that Ysgol Borthyn is not suitable as a receiving school.</p>	<p>The authority acknowledges there will be an increase in pupil numbers at Ysgol Llanbedr, as per the information contained within the consultation document. This view is noted however the authority maintains the view that Ysgol Borthyn is a suitable alternative school should the current proposal be implemented.</p>
<p>13.4</p>	<p>Not for the Diocese to bring forward proposals it is for the authority to determine if this is a viable option before commencing consultation on closure.</p>	<p>Should a proposal be sought for the school to become a Voluntary Aided School it would be the responsibility of the Diocese to draft and publish the proposal. The local authority would not have the power. The authority has undertaken an options analysis with regard to options for</p>

		school re-organisation for the Ruthin area. Those pertaining to Ysgol Llanbedr were included within the consultation document. The educational benefits that would be achieved by Federating Ysgol Llanbedr could also be realised by the current proposal and result in a fairer distribution of resource within main stream schools in the Ruthin area.
Section 15: Impact of the Proposal on Staff and the Governing Body		
15.1	If all the staff choose to take redundancy overall cost to authority would be £43k. No costings for HR support. Would reduce cost savings.	Any school re-organisation process could result in staff redundancy. However, the council would actively seek re-deployment as a preferred option for staff. Where school organisation proposals have been implemented previously redundancies have been minimal with the majority of staff re-deployed. Costs for support from HR are absorbed by the SLA and would not reduce the proposed savings. Should the proposal be implemented all staff would be offered 1-2-1 meetings with a HR officer to discuss options such as redeployment, their well-being and to offer support and advice appropriate to the needs of the individual members of staff. All members of staff have been offered support by HR and a member of the HR team has visited the school during the consultation period.
15.2	More staff required in Ysgol Borthyn as infant class size would be over 30 and there will be extra resources needed for ALN pupils.	Based on admission data for September 2015 the Reception class size would not exceed 30 pupils. There are currently 10 pupils in the Reception class at Ysgol Llanbedr and 18 pupils in the Reception class at Ysgol Borthyn. Within the nursery provision there are 4 nursery pupils at Ysgol Llanbedr and 14 nursery pupils at Ysgol Borthyn.
15.3	No regard for the impact this will have on the Governing Body who have invested a significant amount of time and effort into this school.	The authority has acknowledged the impact of the proposal on the Governing Body of Ysgol Llanbedr. The Council acknowledges that school organisation proposals can result in a great deal of change for pupils, staff and the Governing

		<p>Body members. Should the current proposal be implemented the existing Governing Body at Ysgol Llanbedr would cease. The authority in partnership with the proposed receiving school, Ysgol Borthyn, would seek to ensure that the community of Llanbedr would be appropriately represented.</p>
<p>Section 16: Impact of the proposal on pupils</p>		
<p>16.1</p>	<p>Impact on pupils: Pupils will lose contact with their local church. New teachers and peer group but also a new set of clergy. There will be no association between school and home faith provision. At least 15 pupils will require transport as a result of the move. Route planner shows the distance to be 3.3miles. The route from Llanbedr means travelling through Ruthin during busy times of the day or travelling along single track roads with their higher accident risk. Increasing the distance travelled for 15 pupils has a negative impact on pupils. However it is more important to note that the way they will travel to school is likely to change. This will be very stressful for pupils as they will be expected to travel by taxi with drivers who they do not know. DCC is trying to reduce transport costs across the county so surely additional requirement has to be a negative impact? Doc DCC school transport costs Ruthin area annexed.</p> <p>No mention of pupils losing their friends, bonds they have made with all the staff not just teachers.</p> <p>Limited parking at Ysgol Borthyn, crossing trunk roads on a twice daily basis to get from car parks to Ysgol Borthyn and back, loss of rural learning environment, loss of forest school area, outdoors etc. loss of links with the community in which they live, loss of identity with their community, loss of pride in their village/community.</p> <p>There would also be an impact on parents who would lose</p>	<p>The authority, in partnership with the school community at Ysgol Borthyn and the Diocese, would seek to ensure that links were made with the Llanbedr community and St Peters Church.</p> <p>The authority would like to clarify that although 15 pupils would be eligible for school transport should the proposal be implemented it is not the case the distance would be increased for all 15. 4 pupils would be eligible for transport but live closer to Ysgol Borthyn which is their nearest suitable school resulting in a reduced travel time. The remaining 11 pupils live within the Llanbedr DC area and it is recognised their home to school travel would be increased however this would be within the Welsh Government guidelines for pupil journey times. Some pupils have closer English medium Church in Wales's schools other than Ysgol Borthyn however these are out of county. The authority would like to note that the current approach to Ysgol Llanbedr is along a single track road.</p> <p>The authority has identified changes that pupils may face should the proposal be implemented within the consultation document. Where school organisation proposals have been implemented previously the School Improvement Team have worked closely with the schools and pupils involved to make arrangements for pupils to undertake taster days or to join activities with their new peer group. Should the proposal be implemented the authority would seek to undertake</p>

	<p>the “informal social environment” which was such an important part of Ysgol Llanbedr. This would also negatively impact the wider community since many plans are hatched at the school car park that involve community council, friends of Ysgol Llanbedr and other village events, including social activities that support the village pub and events in the village hall.</p> <p>No assessment of psychological damage for the learners, parents and community in having to face the closure of their school not once but twice.</p>	<p>such transitional arrangements.</p> <p>The majority of pupils who attend Ysgol Borthyn utilise walking routes to school. Only 1 pupil receives home to school transport and arrangements. There is a council owned facility directly opposite the school which can be utilised by parents who pick up and drop off pupils by car. There is a school crossing patrol located outside the school to assist both parents and pupils, in addition to a pelican cross located near the entrance of the school. Walking routes on the approach to Ysgol Borthyn are all designated safe routes to school.</p> <p>Equivalent school facilities are available at the proposed alternative school, Ysgol Borthyn. Estyn commented that the school offered “a good range of resources, including ICT, provides an appropriate range of learning opportunities for all pupils. The well-maintained school building provides a clean and pleasant learning environment. There is plenty of space available on the school site for outdoor play and learning. Areas such as the vegetable garden, forest area and the secure play area for children in the Foundation Phase extend opportunities for learning well.”</p> <p>The authority acknowledges that school organisation proposal will impact on the school community however the authority would seek to assist Ysgol Borthyn, as the proposed alternative school, in fostering links with the wider Llanbedr DC community. This could be achieved via the work of the Governing Body and PTA.</p> <p>Please see section 2.4 of this document regarding arrangements for learners.</p>
<p>16.2</p>	<p>No detail as to what steps would be taken and what budget would be allocated to enable the support to take place.</p>	<p>This would be absorbed within current officer roles within the School Improvement Team. As stated above such arrangements have been undertaken in other cases successfully.</p>

16.3	Additional support will be required in Ysgol Borthyn as one pupil would receive one to one support at Ysgol Borthyn that was not provided at Ysgol Llanbedr.	Should the current proposal be implemented the appropriate officers would work with individual pupils and their families to establish what support is required at the receiving school. All support that pupils currently receive would be replicated within their new learning environment.
Section 17: Additional Learning Needs (ALN) and Groups of Vulnerable Learners		
17.1	ALN no information detailing what support would be given and how it would be funded. Higher than average cohort of registered ALN pupils will put additional strain on the building capacity as not only will there be more pupils but more teaching assistants.	The support pupils receive would be the support package that is currently being implemented for the individual pupil. Should there be a requirement through additional support this would be provided in accordance with the needs of the pupil and would be assessed through the Additional Learning Needs Moderation Panel.
Section 18: Transport Arrangements		
18.2	Transport: Effect of transport on pupil outcomes.	A number of pupils across Denbighshire, and Wales, are transported to school using home to school transport (taxi, mini bus or coach). There is no evidence that demonstrates a correlation between pupil outcomes/attainment and school transportation. School transport times for the existing pupils of Ysgol Llanbedr to the proposed alternative school, Ysgol Borthyn, are within travel guidelines as issued by the Welsh Government. For 21 pupils Ysgol Borthyn would be closer to their home locations therefore reducing their home to school journey times.
18.4	Public car parks nearest to Borthyn at least 240m or 325m from school and require pupils to cross one main road with no school crossing patrol. This is in comparison to Ysgol Llanbedr where parents/carers could park in the school car park or in the lay-by without the need to cross any busy roads. Where will the school transport drop off and pick up the 15 children entitled to school transport. School is on a main road and will add to congestion- will increase risk to pupil safety.	The majority of parents currently transport their children to Ysgol Llanbedr. A number of pupils live within close proximity to Ysgol Borthyn. Walking routes on the approach to Ysgol Borthyn are considered safe walking routes to school. There is a pedestrian crossing located near the school and a school crossing patrol is in place in the mornings and afternoons. There is currently only one pupil receiving transport to Ysgol Borthyn. School transport vehicles do not allow pupils to disembark onto the main road, there is access available from the adjoining housing estate were

		school transport vehicles allow pupils to disembark. A member of staff from the school is also present at the location.
Section 21: How will the consultation take place?		
21.2	<p>Not sufficient information for people to fully participate in the consultation process. The Diocese believes that the consultation is once again in reality only on one option. There is no evidence to suggest that DCC has seriously considered other alternative proposals as either solutions other than closure or as to why Llanbedr should be singled out for closure rather than other possible schools. Have not produced evidence to support claim that a number of other options have been considered. We would expect to see copies of internal reports, research undertaken by officers, questions on federation. Expect to see benefit analysis and proper business case examining the alternatives and showing how officers came to an informed decision.</p>	<p>The authority note this view however it is the view of the authority that a range of information has been provided in accordance with the requirements set out in the Code. Denbighshire's Cabinet agreed to consult on closure. The Diocese of St Asaph and the Governing Body have presented an option for Federation and a change of status from VC to VA. In making this decision the Cabinet clearly stated that they would review any costed proposal for federation and change of status to VA. The information submitted will be considered prior to the decision being made to proceed to statutory notice.</p>
Community and Welsh Language Impact Assessment		
	<p>How can DCC say they are committed to community focused schools when they are looking to close a school which will negatively impact on the community? Ysgol Llanbedr is an important part of the community with many children partaking in activities at the village hall, the Church and village events such as the Village Flower Show, Fun Run, Christmas Lights, Harvest Festival, St Davids Day Concert, Bonfire Night, Community Craft, Older People's luncheon etc. Without Ysgol Llanbedr these events would suffer.</p>	<p>The Council's policy clearly states "Any review of schools within an area will have to take into consideration the impact and benefit a school or its facilities have within the local community. The Community Impact Assessment will take into consideration both the community use of the school buildings and the wider impact the school has within the community. However the overriding factor in any such review would be the effect on the standard of education and lifelong learning to be provided in the area." The authority has acknowledged that a school closure will inevitably impact on a community but that the proposal will assist the standard of education in the area.</p>
	<p>Although Ysgol Llanbedr is a Category 5 English medium school, 100% of the children are members of the Urdd and partake in Urdd</p>	<p>The national curriculum for the Foundation Phase includes Welsh Language Development (Welsh as a second</p>

activities therefore Ysgol Llanbedr plays an important part in the local area in successfully introducing and encouraging native English speakers to the Welsh language. The impact assessment shows that 97% of the children in Ysgol Llanbedr can speak Welsh, however there is no comparison data for Ysgol Borthyn or other English medium schools. The closure of Ysgol Llanbedr would have a negative impact on the Welsh Language.

language). Pupils in the Foundation Phase should learn to use and communicate their needs in Welsh to the best of their ability. Pupils should be encouraged to do so and should be increasingly exposed to Welsh. At Key Stage 2 pupils should build on these skills. This is followed by all schools in Wales, such as Category 5, schools which teach Welsh as a second language. The data provided within the assessment is clear that no pupils speak Welsh fluently. 32 pupils can speak Welsh but not fluently and 1 pupil cannot speak Welsh. This data was provided by the school.

The impact assessment included outcomes at the end of Key Stage 2 Second Language Welsh assessment for Ysgol Borthyn with 100% of pupils gaining the expected outcomes. There is no data available for 2014 for Ysgol Llanbedr however in 2013 this was 100% and for Ysgol Borthyn in the same year this was 90%. Both were above the local and national average. Should the proposal be implemented pupils of Ysgol Llanbedr would receive an equivalent standard in respect of Welsh language provision.

Denbighshire County Council is committed to the Welsh Government's aspiration of delivering 'a sustained increase in both the number and percentage of people able to speak Welsh' and recognise the importance of bilingualism in the 21st century. DCC have adopted a long term aspiration that all children and young people in Denbighshire will leave full time education being competent and confident in using both Welsh and English. Outcome 5 of the Welsh in Education Strategic Plan aims to have 'more learners with higher skills in Welsh' including Welsh second language.

There is insufficient capacity within Ysgol Borthyn to receive all the pupils from Ysgol Llanbedr. All parents have indicated a preference for an English medium faith based education which can only be

As of September 2015 there were 32 Full Time pupils in Ysgol Llanbedr and 4 Part Time pupils. The current capacity of Llanbedr is 54 (this will increase to 77 as of September 2016

offered by Ysgol Borthyn. The preference for a rural, community based school is also being ignored.

however a flexible admission number is currently being applied) which results in 22 surplus places equating to 40.7% of the total capacity. As of September 2015 there were 116 Full Time pupils at Ysgol Borthyn and 14 Part Time pupils. The current capacity of Borthyn is 142 which results in 26 surplus places equating to 18.3% of the total capacity. Part time (nursery places) are not included within the full time pupil capacity and are calculated separately. The table below provides current numbers of pupils on roll as of September for both Ysgol Borthyn and Ysgol Llanbedr;

	N	R	1	2	3	4	5	6
YL	4	10	7	3	7	2	3	0
YB	14	18	22	19	11	13	16	17
T	18	28	29	22	18	15	19	17

**N&R admission data as of September 2015.*

Should the proposal be implemented and all full time pupils transfer to Ysgol Borthyn this would result in a total of 148 full time pupils. Ysgol Borthyn has accommodated full time pupil numbers greater than 142 full time pupils in the past. Within the capacity assessment there is potential accommodation for 23 further full time pupils at Ysgol Borthyn. As demonstrated should all pupils transfer to Ysgol Llanbedr the pupils could be accommodated within the current class structures and would not exceed 30 pupils per class. There is also further faith provision within the Ruthin area, Ysgol Llanfair DC which has a capacity of 113 with 23 surplus places as of September 2015. Ysgol Llanfair DC is a Category 2 dual stream provision. Further information relating to the categorisation can be found in section 5.3.

The Council recognises that pupil numbers in Ysgol Llanbedr

	<p>will increase over the coming years and this data has been contained within the pupil forecasts data within the consultation document. The authority remains of the view that these pupils coming through the system can be accommodated at Ysgol Borthyn within existing class structures going forward and the reduction in capacity within the English medium faith based primary sector would not result parental choice being removed.</p>
<p>It is accepted that parents may choose to travel further to access faith education.</p>	<p>The authority acknowledges this however the majority of pupils currently attending Ysgol Llanbedr have nearer English medium faith based provision than Ysgol Llanbedr.</p>
<p>Events Listed: The majority of these events would be negatively affected by the closure of Ysgol Llanbedr as it would be unrealistic to expect children to support them if they are at a different school in a different area.</p>	<p>The authority acknowledges that school closure will inevitably impact upon a community. It is recognised by the authority that the school plays an important role in the community, should the proposal be implemented there would be scope to extend links with Ysgol Borthyn and the Llanbedr community. Due to the proximity of Llanbedr to the town of Ruthin the authority would seek to assist the Governing Body and PTA of Ysgol Borthyn to foster links with the wider Llanbedr community.</p>
<p>The children will lose contact with their local church (St Peters Llanbedr). Not only will they need to get used to new teachers and peer group but also a new set of clergy. There would be no association between school and home faith provision.</p>	<p>Ysgol Borthyn is also a Church in Wales primary school, this would provide pupils with continuity in faith based provision should the current proposal be implemented. Should the current proposal be implemented there would be scope for Ysgol Borthyn to extend links with the local church, St Peters, in Llanbedr DC.</p> <p>Estyn commented that “daily acts of collective worship and close links with the local church provide pupils with valuable opportunities to reflect on spiritual and moral issues” and that “links with the local church enrich pupils’ spiritual experiences”. Furthermore that “the school’s partnership with Llanfwrog Church helps pupils to make good progress with their spiritual development. There are weekly visits by</p>

	the rector to assembly and classes, and pupils perform services in the church on religious festivals. These, plus school visits to places of worship, such as St Asaph Cathedral, support the religious education syllabus well."
Ysgol Gellifor is looking to change to Category 2.	Denbighshire has not received a request from Ysgol Gellifor to seek to change Category. To change language Category the school would have to undergo a statutory consultation process.
Ysgol Llanbedr is subject to charitable interest- the school has a reverter therefore according to charity commission law the property reverts back to its previous owner when it stops being a school.	The authority would not pursue proposals to close any school based solely on financial gains such as capital receipts. In some instances this can be a residual benefit however educational aspects of proposal can outweigh such financial benefits and must be the primary concern.
15 pupils will require transport as a result of a move. The route from Llanbedr means either travelling through Ruthin during its busy time of day or travelling along single track roads with their higher accident risk.	The majority of pupils currently attending Ysgol Llanbedr are not from the Llanbedr area. 21 pupils have home locations closer to Ysgol Borthyn. The authority would like to note that the current approach to Ysgol Llanbedr is along a single track road. The authority would like to clarify that although 15 pupils would be eligible for school transport should the proposal be implemented it is not the case the distance would be increased for all 15. 4 pupils would be eligible for transport but already live closer to Ysgol Borthyn which is their nearest suitable school. The remaining 11 pupils live within the Llanbedr DC area and it is recognised their home to school travel would be increased but this would fall considerable under the Welsh Government guidelines. Some pupils have closer English medium Church in Wales schools other than Ysgol Borthyn.
Where is the evidence to prove that the 71 houses would not generate a significant number of pupils? This statement has been manufactured to advantage the authority's position.	The Council calculate how many additional pupils would be generated should homes under the LDP be implemented using an agreed formula which is based on data gathered by Local Authorities. The primary school multiplier is 0.24 (no.

	<p>of dwellings x 0.24). Should the 70 homes be built in the Llanbedr DC area this would generate an estimated 17 pupils as per the formula. The developments are expected to be phased with 20 homes identified to be built by 2020. This includes 5 homes in 2017, 5 homes in 2018, 5 homes in 2019 and 5 in 2020. There is no guarantee that all of these pupils would access the provision at Ysgol Llanbedr due to parental preference for language medium and other types of provision.</p> <p>As of May 2015 there were 37 pupils of primary school age living within the Llanbedr area. 12 pupils were attending Category 5 English medium (non-faith) schools including Ysgol Borthyn, Ysgol Gellifor, Rhos Street School and Ysgol Bro Famau. A further 12 pupils were accessing Welsh medium education and a further 2 pupils were accessing Category 2 provision. 11 pupils from Llanbedr DC were attending Ysgol Llanbedr.</p>
<p>No consideration of factoring in parental choice for faith education.</p>	<p>Should the current proposal be implemented, parents who wish to access faith based provision in their chosen language medium can continue to do so. Ysgol Borthyn is the proposed receiving school which provides a Church in Wales faith based provision. There is additional faith provision within the wider Ruthin area. The Council have ensured that as a consequence of the Ruthin area review a mix of rural, town, community and faith based provision remains available.</p>
<p>No information to show how these links {with the community} could be developed or what budget has been allocated towards it.</p>	<p>The authority would seek to work in partnership with Ysgol Borthyn as the proposed receiving school to foster links with the school community and wider community of Llanbedr DC. This could be achieved via the work of Governing Body and PTA with support from the authority.</p>
<p>Munchkins@Llanbedr is a wraparound childcare facility based on site at the school and it would not operate with the school closed.</p>	<p>The Denbighshire County Council childcare sufficiency report (2014) noted that there were a total of 354 childcare</p>

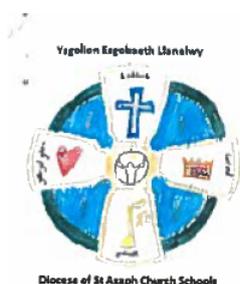
The Community Council have highlighted the importance of this service to people within the community. Having such a flexible and high level of childcare within the community allows parents to get back to work and studies thus contributing to the local economy. Not possible for Munchkins to operate from the village hall.

places available in the Ruthin area. There were 258 children of 0-3 years of age in 2014 with 50% of childcare vacancies empty for this age range not taking into account 118 spaces within full day care private provision. The full day care provision in Ruthin has a daily capacity of 57% of the numbers it could cater for suggesting that there is more than adequate childcare options and places available within the area. Other full day child care is available in the Ruthin area. The authority notes concerns that 'munchkins' would not be viable without the school remaining open. It has been proposed that the village hall would be suitable however consultees have stated that this would not be an option as the village hall is well utilised throughout the day and could not accommodate the facility. Other schools, including Ysgol Borthyn, have wrap-around-care available. Ysgol Borthyn offers 'Borthyn Bunnies' playgroup for pupils aged two and a half years and over for morning and afternoon sessions. Other schools within the area also offer similar wrap-around-care provision, breakfast club and after school club. Although the authority recognises the importance to parents of wrap-around-care it is important to note that this is not a statutory provision.

END

DRAFT

Appendix F (i)



ESGOBAETH LLANELWY / DIOCESE OF ST ASAPH

27th July 2015



Ms Jackie Walley
Head of Modernising Education
Denbighshire County Council
County Hall
Wynnstay Road
Ruthin
LL15 1YN

Dear Jackie

**Re: School Standards and Organisation Wales Act 2014, Section 43
Proposal to discontinue Ysgol Llanbedr Church in Wales Voluntary
Controlled School**

Please find attached the formal response of the Diocese of St Asaph to the formal Consultation Document.

We strongly oppose the proposal and believe that the decision to proceed to a second consultation to close Ysgol Llanbedr was the wrong one. The consultation document is not materially different to the document released by the Local Authority in October 2013 and does not offer any convincing argument that closure is the only option available. We would remind you that consultation in line with the code should be made when proposals are at a formative stage. The sustained campaign by the authority to close this viable school cannot be described as formative since it has been ongoing since December 2012.

Indeed as the First Minister said in the Senedd on the 23rd June 2015 *"It's clearly important that local authorities are able to take communities with them. If they consult on proposals that are no different from the original proposals—and I don't know what the new proposals look like; I need to state that—then clearly it will be more difficult for them to explain why they have done that. I've not seen the second consultation document. What is clear, though, is there needs to be a solution that is to the satisfaction of the local community."*

We believe that the authority could and should have consulted on a range of options so that the local community had the opportunity to respond fully which ultimately would have allowed cabinet members to be better informed before they were presented with a further report from the Lead Member.

Swyddfeydd yr Esgobaeth, Stryd Fawr, Llanelwy, Sir Ddinbych LL17 0RD
Diocesan Offices, High Street, St Asaph, Denbighshire LL17 0RD
☎ 01745 532593 📠 01745 530078 E rosalindwilliams@churchinwales.org.uk
www.dioceseofstasaph.org.uk

Mae Esgobaeth Llanelwy yn croesawu gohebiaeth yn y Gymraeg neu'r Saesneg

The Diocese of St Asaph welcomes correspondence in Welsh or English

As it is, we have no doubt that the response annexed hereto will be given cursory consideration but that the report prepared by your team for cabinet on the 29th September will continue to propose that this school is closed without giving it the opportunity to prove its ongoing viability because the authority has failed to consult on a range of options.

Numbers on roll at Ysgol Llanbedr have increased during the three years that Denbighshire County Council has been trying to close it. Most schools in a similar situation would have seen numbers fall but this school has reversed that trend.

The Governing Body despite the difficulties of leadership in 2011-12 have overcome those problems caused by decisions beyond their control and have worked diligently to run a school that produces excellent results and is growing. They have not been downhearted by the constant vote of no confidence in the schools viability by elected members and officers but rather have risen to the challenge and even most recently addressed pre-cabinet on the 11th May 2015 with a proposal that didn't just ask the authority to maintain the status quo but rather challenged themselves and the authority to consider how a change in status and federation would further enhance their learning journey and provide even higher standards and increase their effectiveness.

Despite this proposal elected members did not ask you to investigate this further, and their decision on the 2nd June did not mandate your team to consult on this proposal alongside closure. This in our view is a serious flaw and demonstrates that the authority has not seriously considered alternatives to closure. This is further proven by the lack of credible information in the consultation document on alternatives to closure.

We are disappointed that no cabinet member, including the Lead Member for Education, has contacted either the Governing Body or the Diocese since the decision to go back out to consultation was announced in February 2015 to find out more about the progress of the school, speak to the Governing Body or speak to the Diocese of St Asaph about any alternatives to closure or to fact find during the consultation period. Officers do not seem to have encouraged elected members to develop a balanced view and consider alternatives, preferring them to pursue only the agenda of closure. We would suggest that there is not enough information in the consultation document to allow a reasonable person to conclude that closure is the only option in this case and that this is a significant flaw.

The alternative proposal put by the Diocese and Governing Body meets the broader policy aims of cost savings and addressing surplus places. The numbers at Ysgol Llanbedr are growing despite the authority putting every obstacle in the way of the school to attract new parents. We have supplied information that shows indicative numbers on roll and should the threat of closure be withdrawn it is reasonable to conclude that this will improve further.

We have a federation partner in mind and despite the difficulties associated with a school under threat of closure and the fact that cabinet's decision to consult which effectively removed Ysgol Llanbedr as a viable partner; this school is actively considering whether it could be a federation partner. We have also recently been made aware of another school who may want to consider federation with Ysgol Llanbedr. The issue is the uncertainty created by the current consultation.

No one has visited Ysgol Borthyn to see the corridor area that officers recommend should be used as additional classroom space, even though there has been no fire risk assessment on this proposal and the previous works required have not been carried out despite assurances to Welsh Government from your department in June 2014 that these would be done by March 2015.

Numbers at Ysgol Llanbedr and Ysgol Borthyn are growing and the most important consideration is that there is not capacity in Ysgol Borthyn for all the pupils from Ysgol Llanbedr. It would take a class over the infant class size limitations. The Headteacher at Ysgol Borthyn has confirmed that they will not have capacity, especially as they are *“turning the Foundation phase into a unit in September, so that it would be more free flowing and mixed age”*. This means that officers are recommending that a space in Borthyn not currently used as classroom space and which has not been assessed as teaching space under fire regulations could make suitable accommodation.

This is one example of how we believe that the consultation document is once again flawed. Proper assessments of the capacity and space at Ysgol Borthyn should have been done prior to the beginning of this consultation. How can parents fully satisfy themselves of the adequacy of the space if this information was not provided to them at the point of consultation when assessing the alternatives? Equally how can the Governing Body and parents at Ysgol Borthyn make proper assessments of their needs if this information has not been communicated to them and they have not been adequately consulted. Ysgol Borthyn is a good school and this is recognised by the recent ESTYN revisit, but the authority has not fully considered the impact of so many additional pupils on the staff or on the available space. There is no consideration of the existing or new additional needs pupils and how they will be affected by the reduction in space or the change in numbers.

In the report officers suggest that there is surplus in English medium provision in the Ruthin area but they fail to differentiate that this is not in faith school settings. There is a demand for two English medium faith schools in the Ruthin area; we have demonstrated this by the growing numbers in the system. It is not acceptable to use Ysgol Llanfair DC as an English medium alternative, this is a category 2 bilingual school which offers a different language continuum to parents and fulfils its own role in the range of provision in the Ruthin area.

We have scrutinised the consultation document from chapter 1-22 and have made comment or ask for further clarification on every element that we believe has not been fully explained or explored. We have also provided strong rebuttal evidence and reports from Welsh Government and ESTYN which support our contention that Ysgol Llanbedr is a viable school and should be given a period out of formal consultation to determine and model its future

We would request that the questions we raise are answered fully before this matter is taken back to cabinet on September 29th 2015. We believe that this consultation document is again flawed and does not meet the criteria set out in the School Organisation Code on a number of levels which are outlined in our detailed response. We reserve the right to refer this matter to ministerial and/or judicial adjudication should the authority proceed with this flawed consultation.

We can think of no better way to urge the authority to reconsider its decision than to remind you again of the First Minister's words in the Senedd on the 23rd June 2015

"It's clearly important that local authorities are able to take communities with them. If they consult on proposals that are no different from the original proposals—and I don't know what the new proposals look like; I need to state that—then clearly it will be more difficult for them to explain why they have done that. I've not seen the second consultation document. What is clear, though, is there needs to be a solution that is to the satisfaction of the local community."

Yours sincerely



Rosalind Williams
Director of Education and Lifelong Learning



END



Appendix G

Response of the Governing Body of Ysgol Llanbedr

Federation	
Points Raised by GB	LA Response
<p>Aware of 2 suitable schools who are seriously interested and considering federating with Ysgol Llanbedr should the council drop the consultation on closure.</p> <p>Supported by Diocese, parents, governors and staff.</p> <p>Is an alternative to closure</p> <p>Estyn, Welsh Government and Ofsted all promote federation, particularly within rural schools.</p> <p>WG small schools order now makes it easier for schools to federate.</p> <p>Sharing best practice is a win-win for both schools. Federation facilitates the sharing of good practice and encourages schools to be more outward looking, the impact being improved standards of teaching and learning outcomes for pupils.</p> <p>Ysgol Llanbedr has many areas of excellence which could be shared and developed such as well-developed and varied curriculum and extracurricular activities; excellent pastoral care and nurturing ethos; strong links with local community; effective communication with parents; best practice model of wrap around care; Greater pool of resources and staff expertise; excellent outdoor provision; shared use of astro turf.</p> <p>Provides a development opportunity for a head teacher, as it would allow a head teacher to stay in post. Would be a full time head rather than having a teaching commitment.</p> <p>Cost saving involved in Federation due to only having one head teacher over two schools. Saving of at least £15k-</p>	<p>The local authority has explored the option of Federation for Ysgol Llanbedr, the advantages and disadvantages of all alternative options were detailed within the formal consultation document. The authority broadly agrees with the benefits put forward in relation to federated school models however there are other issues, such as surplus places, fairer and more equitable distribution of school funding and greater efficiency and effectiveness of the school estate. These issues were detailed at the outset of the Ruthin area review of primary education.</p> <p>It is the view of the authority that whilst federation outcomes would realise some benefits such as stability of leadership, pupils access to a broader compliment of staff etc. These same benefits can also be realised through the option to close Ysgol Llanbedr whilst also providing economies of scale for the benefit of all pupils within the area.</p> <p>As stated by the Diocese and also the Governing Body of Ysgol Llanbedr in their response to the consultation there are potential teaching, learning and educational experience enhancement opportunities for pupils. Options for sharing best practice and the pooling of resources can be achieved in a federated model however these benefits can also be achieved at a single site school. For example, Ysgol Borthyn the proposed alternative school, has a broad compliment of staff with an established senior leadership and middle management teams. The authority remains of the view that whilst these benefits can be realised in a federation the proposal to close Ysgol Llanbedr and transfer existing pupils to Ysgol Borthyn where pupils will have access to a broader compliment of teaching staff, curriculum leads and established leadership teams will also deliver benefits. In a federated arrangement Ysgol Llanbedr will still remain a small school, surplus capacity will remain and likely increase as of September 2016 due to a revised capacity assessment at the request of the school and Governing Body. The authority acknowledges that there will be an increase in pupils however there is not a general increase in the numbers of pupils across the Ruthin area indicating</p>

<p>£20k.</p>	<p>that the quantum of pupils will not change. Birth rates and pupil numbers have remained static for a number of years. The efficiencies and economies of scale that can be achieved by transferring pupils to Ysgol Borthyn with a sustainable number of pupils, single governance and established leadership structures will provide better use of resource and provide pupils with a broad range of learning and development experiences and opportunities.</p> <p>The authority remains of the view that in light of the benefits that can be realised through federation (and these benefits were detailed within the formal consultation document) and light of the availability of alternative provision within the area.</p>
--------------	---

<p>Change of status to VA</p>	
<p>Points Raised by GB</p>	<p>LA Response</p>
<p>Changing status from VC to VA reduces the county's costs, as the school governing body and diocese become more involved and responsible for the management and operation of the school.</p> <p>Governing body controls admissions rather than county; governing body recruit and employ staff;</p> <p>any capital works done at the school are paid for by the Diocese/Governing Body/ WG</p> <p>The school grounds and buildings not owned by the county, rather they are held in trust by the Diocese, so it is sensible to move to VA status where the county does not pay to improve the site.</p> <p>VA status would allow an English language Church in Wales school to exist in the Ruthin area with significantly reduced cost and liability to the council. The school could be improved and at no cost to the council yet benefit the pupils of Ysgol Llanbedr and</p>	<p>If the status of Ysgol Llanbedr changed from VC to VA the school budget would be calculated in the same way as other schools (community, VC etc.). The difference would be under premises allocation for maintenance.</p> <p>Although VA schools do remove some financial responsibility from the local authority they would still receive 75% of a repairs budget and 15% of additional repairs budget.</p> <p>Taking the school budget for Ysgol Llanbedr 2015/2016 and applying the above would have resulted in a total saving to the overall delegated budget of £453.</p> <p>The Council administers the admissions process for 16,000 pupils. The % of these pupils who attend Ysgol Llanbedr would be 0.3% and therefore any change would make no real saving to the authority</p> <p>The Council is aware of funding opportunities for VA schools and their respective Diocesan authorities to seek 85% funding from the Welsh Government towards improvement works to the schools. In considering any proposal for the school to become a VA school the authority would need assurances from the Governing Body and the Diocesan Authority regarding their financial</p>

<p>the wider Ruthin area. There is a lot going on with the Ruthin review and other areas, by allowing Llanbedr to stay open and change status the Council could release some responsibility for the school allowing the council to focus its ever reducing resources on other schools in the review and in the area.</p>	<p>capacity to fund the remaining 15% of such works for this to be seen as a real benefit.</p>
--	--

Consultation Process	
Points Raised by GB	LA Response
<p>Point 5.6 states 'DCC has carefully considered a number of options'. Where is the evidence in this consultation document that anything has significantly changed since the first consultation in 2013? Surely with other school reorganisation progressing, the options in 2015 must be different to those in 2013.</p>	<p>Alternative options that have been explored by the authority were detailed in the formal consultation document alongside the advantages and disadvantages of each option.</p>
<p>There have been no meetings with the MET with staff, parents or the Governing Body or community. Communication process poor- some staff found out about the 2015 consultation in the paper back in February.</p>	<p>The Code does not make it mandatory for the authority to carry out meetings with parents and received no request from parents during the Consultation period for such meetings.</p> <p>Should the proposal be implemented the Council would work with individual parents and pupils based on their preference for alternative provision. This would include transitional opportunities for pupils (i.e. taster days) and opportunities for parents to visit schools such as Ysgol Borthyn.</p> <p>No decision had been made regarding a consultation in February 2015. Cabinet made a decision to consult on the proposal on 2nd of June 2015. The Diocese, staff and</p>

	<p>Governing Body were made aware of the decision and the proposed date for commencement of the formal consultation period.</p>
<p>Meant to be a totally new consultation, not a continuum of the last one. Was a complete appraisal of the current situation carried out prior to launching the consultation? Appears many of the arguments used in the 2013 consultation have been used in 2015.</p>	<p>The proposal to close Ysgol Llanbedr has been undertaken afresh by the local authority.</p> <p>Following the decision by the Minister in January the recommendations made were presented to Cabinet. A number of options were considered alongside the current situation in the Ruthin area. The preferred option of the local authority, based on educational and strategic rationale, was to propose closure in light of the current situation within the Ruthin area.</p>
<p>This consultation is persecution of the children, there has been no gap in between the ministers decision and start of the second consultation- is 10 days really enough time to fully consider the ministers recommendations?</p>	<p>The Children's Commissioner and the authority have been in dialogue regarding the consultation. The authority would ask that the findings are made known to the authority and the decision makers (Cabinet members).</p> <p>The authority has made adequate arrangements to ensure that the best interests of learners are ensured during this process. This has included producing a children and young people's consultation document- to which numerous pupils have supplied a response.</p> <p>The authority, in conjunction with the Governing Body of Ysgol Llanbedr DC, facilitated a consultation session for the pupils of Ysgol Llanbedr which allowed them to put forward their views on the proposal. This is set out in Appendix C.</p> <p>Prior to the commencement of the consultation in June 2015 the authority contacted the school regarding arrangements for pupils during the consultation period. It was stated that should staff at the school or parents/carers become aware of any issues resulting in pupils requiring additional support this could be provided by contacting the relevant support officers within the school improvement team. Neither the school nor individual families have approached the authority with any concern to date. Should the proposal be formally published this support would continue.</p>
<p>This second consultation is unprecedented and we do not believe it has been carried out in a better manner than 2013.</p>	<p>This view is noted.</p>
<p>Any consultation is meant to consider the matter afresh. How can we have an unbiased consultation with the same</p>	<p>This view is noted.</p>

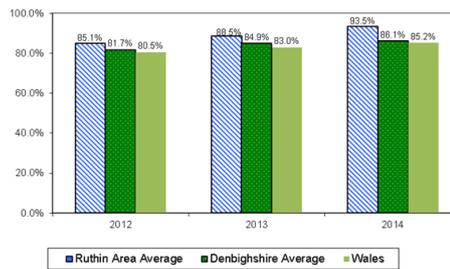
<p>people on panels that made the decision last time?</p>	
<p>The minsters letter had too many recommendations to offer a second unbiased review.</p>	<p>This view is noted.</p>
<p>What training and qualifications do the DCC education panel and elected members have to make them the best people to carry out school reorganisation consultations? Should the same people who were involved in the seriously flawed consultation of 2013 be able to try and carry out another consultation? What training has been received?</p>	<p>Since the Code was implemented in 2013 the WG have introduced a quality assurance system upon the publication of formal consultation documents. This ensures that local authorities are compliant with the factors set out within the Code (1.3-1.14).</p>
<p>Given the 2013 consultation for Ysgol Llanbedr was seriously flawed- does this mean for all other consultations- does it mean all Ruthin review consultations are seriously flawed?</p>	<p>The Council note this view however there is no reason to believe other consultations were flawed in this respect.</p>
<p>To imply children from Llanbedr would be offered wider opportunities in terms of curricular and extracurricular activities due to larger cohorts of pupils is unfair.</p>	<p>This view is noted however Ysgol Borthyn provides a broader compliment of staff with curriculum leads and an established senior leadership and middle management teams.</p> <p>Where there are larger cohorts of pupils there are more opportunities for pupils with peers of their own age group.</p>
<p>Council not listening to communities- not just Llanbedr- do Rhos St parents want their school moved? Statement from First Minister reiterated. Council not listening to views of the community.</p>	<p>This view is noted.</p>
<p>Children's document was misleading and so seriously flawed it had to be re-written before GB would allow it to be used with the children. What has happened at Borthyn? Which document did the children use? If the children are completing different consultation documents is this still a</p>	<p>The Council issued an age appropriate formal consultation document for children and young people. This document was issued on the 26th of June.</p> <p>The Governing Body and school approached the authority regarding some elements of the wording within the document. 6 minor changes were made as suggested by the Governing Body as the changes did not</p>

<p>valid consultation?</p>	<p>impact on the context of the document. An amended version was then issued in hardcopy to the school and numerous responses were received from pupils.</p> <p>The pupils at Ysgol Borthyn took part in the consultation session however no formal responses were made via the children's document. Ysgol Borthyn and the other schools identified raised no concerns with the document issued.</p>
<p>Surplus Places</p>	
<p>Points Raised by GB</p>	<p>LA Response</p>
<p>Pupil numbers are not in decline at Ysgol Llanbedr. The school is showing strong growth, continuing to attract families from Llanbedr and further afield. Remarkable since being under threat of closure.</p>	<p>The authority has acknowledged an increase in pupil numbers at Ysgol Llanbedr. As of September 2015 there were 32 Full Time pupils in Ysgol Llanbedr and 4 Part Time pupils. Should all Nursery pupils transition to Reception in September 2016 there would be 36 full time pupils on roll. Although there will be an increase, although marginal, the capacity of Ysgol Llanbedr will increase to 77 full time places equating to a surplus of 53.2%. Ysgol Llanbedr will remain a small school.</p>
<p>Surplus places are in KS2 not foundation phase. Lack of pupils in KS2 is due to the Council managements of the situation in 2011-2012.</p>	<p>Support was provided to the school and Governing Body during 2011-2012. A solution to the issues was reached in mutual agreement with the Governing Body at the time. Ysgol Llanbedr received extensive support from the school improvement team which saw pupil numbers stabilise.</p>
<p>The school and GB have received many expressions of interest from families with pupils at other schools. Especially due to uncertainties around other schools.</p>	<p>The authority is not aware of any mid-term transfers to Ysgol Llanbedr from neighbouring schools.</p>
<p>We know of at least one instance where the council admission office has tried to dissuade families from applying to Ysgol Llanbedr. A formal complaint was raised but not satisfactorily resolved.</p>	<p>The authority has received no further communication regarding the complaint.</p>
<p>The consultation document shows pupil numbers in decline in Rhos St/Ysgol Gellifor- is it pie in the sky projections like for Llanbedr to try and eradicate English medium primaries. Growth in English medium church in Wales expected to grow although overall English medium to decrease. Ofsted data 2007 showed schools under 51 on roll having the most good or</p>	<p>Pupil projections are calculated based on school census information in line with guidance issued by the WG. Pupil projections use school census data from the January PLASC exercise of each year. A formula which takes a 3 year average of the Nursery, Reception and Year 1 class generates trend data for subsequent years. Actuals from each class carry forward for the higher end of the school.</p> <p>At the time of publication no decision had been made regarding Ysgol Rhewl, due to the home locations of</p>

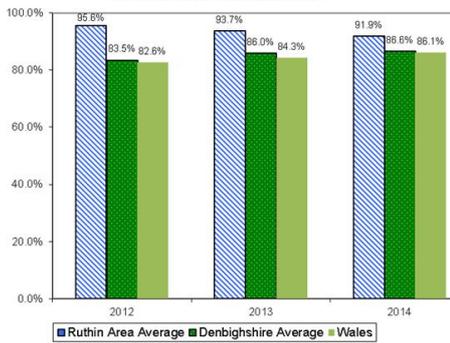
<p>outstanding grades for teaching and 51-100 came next. Good parents and good teachers have long been shown to be the major guarantors of educational outcomes. Small and very small schools have been more proportionately represented in Ofsted outstanding judgements.</p> <p>How can the council seriously put forward Ysgol Rhewl as an alternative primary school when it is due to close in 2017. Going through one school closure would be traumatic enough for any child.</p>	<p>pupils and the language offer at the school it was identified as a school that may be impacted should the current proposal be implemented.</p>
---	---

Ysgol Borthyn as the receiving school	
Points Raised by GB	LA Response
<p>The Code states that when a school is closed that the proposed receiving school is equivalent or better. Borthyn is not equivalent or better from ESTYN inspections or the banding for improvement where Borthyn is Amber-C and Llanbedr is yellow-B.</p>	<p>Estyn have concluded that the proposal is likely to at least maintain the current standards of education in the area. Furthermore they stated that the local authority has;</p> <ul style="list-style-type: none"> • Clearly stated the rationale for the proposal; • The proposer has appropriately considered the impact of the proposals on the quality of pupils outcomes, provision and leadership and management; • Provided a useful range of information relating to performance outcomes. <p>Both Ysgol Llanbedr and Ysgol Borthyn are within Standards Group 3 under the Categorisation system and have similar overall weighted scores (Ysgol Llanbedr 16.5 and Ysgol Borthyn 16). There is a similar picture at both schools.</p> <p>It is the view of the authority that should the proposal be implemented and pupils transfer to Ysgol Borthyn, or another of the identified alternative provision, they would have access to at least an equivalent standard of provision. Educational outcomes and attainment across the Ruthin area is good as a whole. The tables below display the Ruthin area average for both the Foundation Phase and Key Stage 2 (this information was also contained within the formal consultation document);</p>

Percentage of pupils achieving FPOI at the end of Foundation Phase
Ruthin Area, Denbighshire & Wales 2012 - 2014



Percentage of pupils achieving Level 4+ at the end of Key Stage 2
Ruthin Area, Denbighshire & Wales 2012 - 2014



The table below displays the outcomes in the identified alternative schools at both foundation phase and key stage 2 for the last 5 year period;

Foundation Phase- Outcome 5 and above

	2010	2011	2012	2013	2014	2015
Llanbedr	85.7%	87.5%	100%	83.3%	100%	100%
Borthyn	82.4%	77.3%	58.8%	53.8%	100%	70%
Rhos Street	88.9%	90%	95.2%	100%	100%	100%
Gellifor	100%	94.7%	100%	100%	93.3%	75%
Bro Famau	100%	90%	81.8%	90.9%	80%	100%
Rhewl	100%	100%	66.7%	83.3%	85.7%	70%
Llanfair DC	94.1%	86.7%	100%	100%	92.3%	100%
D'shire Av.	82.4%	79.8%	86.4%	84.9%	86.1%	86.4%
Wales Av.	81.6%	82.7%	80.5%	83%	85.2%	86.8%

Key Stage 2 Level 4+

	2010	2011	2012	2013	2014	2015
Llanbedr	84.6%	100%	85.7%	100%	n/a	n/a*
Borthyn	58.8%	78.6%	92.3%	93.3%	80%	83.3%

Rhos Street	93.5%	93.3%	96.6%	92.6%	100%	100%
Gellifor	92.9%	92.3%	100%	91.7%	100%	100%
Bro Famau	91.7%	100%	94.4%	95.8%	100%	100%
Rhewl	100%	100%	100%	100%	75%	90.9%
Llanfair DC	88.9%	91.7%	100%	94.1%	93.3%	100%
D'shire Av.	78.1%	82.3%	83.5%	86%	86.6%	87.9%
Wales Av.	77%	80%	82.6%	84.3%	86.1%	87.7%

**Data has been omitted as it is potentially disclosive*

During the formal consultation period the outcomes for the 2014/2015 academic year were not available. The 2015 outcomes are displayed in the table above. The tables below provide contextualised data for both Ysgol Llanbedr and Ysgol Borthyn for the 2015 academic year;

Contextualised Data Foundation Phase Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	0	1	0	7
Borthyn	6	1	2	10

**Total includes pupils in cohort who are not ALN/FSM/EAL*

Although in 2015 the outcomes at Ysgol Borthyn for the Foundation Phase were below the local and national average, 60% of the cohort were pupils with Additional Learning Needs including 2 pupils who are statemented. A further 20% of the cohort were pupils with English as an additional language (EAL). In summary 80% of the cohort were pupils with ALN or EAL. No pupils at Ysgol Llanbedr had Additional Learning Needs and no pupils were EAL. The Free School Meals % at both schools for the assessed cohorts were similar.

Contextualised Data Key Stage 2 Outcomes 2015				
School	ALN	FSM	EAL	Total in Cohort*
Llanbedr	n/a**	n/a	n/a	n/a
Borthyn	9	2	5	24

**Total includes pupils in cohort who are not ALN/FSM/EAL*

***Data has been omitted as it has potential to be disclosive. Data has been provided to decision makers.*

	<p>Ysgol Borthyn saw an improvement in attainment at Key Stage 2 from the last academic year although this was not above the local or national average. There were a total of 24 pupils in the assessed cohort, 9 of these pupils had additional learning needs equating to 37.5% of the overall cohort with a further 5 pupils having English as an additional language (EAL) equating to 20.8% of the overall cohort. Of the total cohort 8.3% were FSM. The cohort in Ysgol Llanbedr was small; the data relating to the cohort is potentially disclosive. The data has been made available to decision makers.</p>																																				
<p>In terms of KS2 Llanbedr has never been below the local or national averages whereas Borthyn has been below the local and national average for the last 3 of the 5 years. How is this equivalent? How can it be said that Borthyn offers equivalent or better educational standards for the children at Ysgol Llanbedr?</p>	<p>It is the view of Estyn that the proposal would at least maintain the current standards of education within the area should the proposal be implemented.</p> <p>The consultation document has provided contextualised data relating to outcomes at the proposed alternative school, Ysgol Borthyn. The data provides information relating to % of ALN FSM and EAL within assessed cohorts. Ysgol Borthyn overall has a higher than average percentile of pupils with ALN and FSM averages are also higher than the local and national average.</p> <p>For example, for 2013-2014 key stage 2 outcomes when ALN pupils and EAL pupils are abstracted all remaining pupils achieved the expected outcomes. There is a detailed response to the outcomes at Key Stage 2 above.</p>																																				
<p>In terms of FPOI/CSI Ysgol Llanbedr has been better than the local average for 4 out of 5 years- Borthyn below- how is this equivalent?</p>	<p>The consultation document has provided contextualised data relating to outcomes at the proposed alternative school, Ysgol Borthyn. The data provides information relating to % of ALN FSM and EAL within assessed cohorts. Ysgol Borthyn overall has a higher than average percentile of pupils with ALN and FSM averages are also higher than the local and national average.</p> <p>There is a detailed response to outcomes at Foundation Phase above.</p>																																				
<p>There is not capacity at Ysgol Borthyn for the pupils of Ysgol Llanbedr. In 2016 there is predicted to be 150 pupils in Borthyn and Llanbedr, whereas the capacity is 142.</p>	<p>Full time pupil totals for Ysgol Llanbedr and Ysgol Borthyn for September 2015 would be as follows;</p> <table border="1" data-bbox="694 1702 1284 1854"> <thead> <tr> <th></th> <th>N</th> <th>R</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> </tr> </thead> <tbody> <tr> <td>YL</td> <td>4</td> <td>10</td> <td>7</td> <td>3</td> <td>7</td> <td>2</td> <td>3</td> <td>0</td> </tr> <tr> <td>YB</td> <td>14</td> <td>18</td> <td>22</td> <td>19</td> <td>11</td> <td>13</td> <td>16</td> <td>17</td> </tr> <tr> <td>T</td> <td>18</td> <td>28</td> <td>29</td> <td>22</td> <td>18</td> <td>15</td> <td>19</td> <td>17</td> </tr> </tbody> </table> <p><i>*N&R admission data as of September 2015.</i></p> <p>Ysgol Borthyn has sufficient capacity that could be used by the school. Historically Ysgol Borthyn has accommodated full time pupil numbers greater than</p>		N	R	1	2	3	4	5	6	YL	4	10	7	3	7	2	3	0	YB	14	18	22	19	11	13	16	17	T	18	28	29	22	18	15	19	17
	N	R	1	2	3	4	5	6																													
YL	4	10	7	3	7	2	3	0																													
YB	14	18	22	19	11	13	16	17																													
T	18	28	29	22	18	15	19	17																													

	<p>150. During the consultation period a small number of respondents who indicated they were parents expressed a preference for Ysgol Borthyn. The majority of respondents stated they would seek alternative provision.</p>
<p>The number of pupils with ALN at Borthyn is already higher than average 28.2% vs national average of 20.5%. This is not equivalent or better for pupils from Llanbedr.</p>	<p>The inclusion of ALN statistics is to provide contextualised data with regard to the outcomes achieved.</p> <p>There is no reason to believe that the higher than average % of ALN pupils at Ysgol Borthyn would be detrimental to the pupils of Ysgol Llanbedr should they transfer to Ysgol Borthyn.</p>
<p>Borthyn has several EAL pupils (11.3%) versus Llanbedr 0%. National average is 5.5%. Again not an equivalent.</p>	<p>The inclusion of EAL statistics is to provide contextualised data with regard to the outcomes achieved.</p> <p>There is no reason to believe that a higher than average % of EAL pupils at Ysgol Borthyn would be detrimental to the pupils of Ysgol Llanbedr should they transfer to Ysgol Borthyn.</p>
<p>Borthyn does not have wrap around care to the same extent as Ysgol Llanbedr or any sort of holiday club. Would profoundly affect families at Ysgol Llanbedr.</p>	<p>The Denbighshire County Council childcare sufficiency report (2014) noted that there were a total of 354 childcare places available in the Ruthin area. There were 258 children of 0-3 years of age in 2014 with 50% of childcare vacancies empty for this age range not taking into account 118 spaces within full day care private provision. The full day care provision in Ruthin has a daily capacity of 57% of the numbers it could cater for suggesting that there is more than adequate childcare options and places available within the area. Other full day child care is available in the Ruthin area.</p> <p>The authority notes concerns that 'munchkins' would not be viable without the school remaining open. It has been proposed that the village hall would be suitable however consultees have stated that this would not be an option as the village hall is well utilised throughout the day and could not accommodate the facility.</p> <p>Other schools, including Ysgol Borthyn, have wrap-around-care available. Ysgol Borthyn offers 'Borthyn Bunnies' playgroup for pupils aged two and a half years and over for morning and afternoon sessions.</p> <p>Other schools within the area also offer similar wrap-around-care provision, breakfast club and after school club. Although the authority recognises the importance to parents of wrap-around-care it is important to note that this is not a statutory provision.</p> <p>The authority would maintain that the 'Munchkins' facility could continue to operate should the school close which could be in partnership with another school in the area</p>

	who are seeking to expand their provision. DCC would work in partnership with 'Munchkins' should the proposal be implemented and continued use of the current site was not a possibility.
Finance	
Points Raised by GB	LA Response
The budget and finances at Ysgol Llanbedr have been very well managed. The budget has always remained in surplus and is predicted to do so for the next three years. In fact Ysgol Llanbedr is one of only 12 schools in Denbighshire to be predicting a surplus in 3 years time, when the overall deficit for all the schools is expected to be £7.6million.	The authority is aware that Ysgol Llanbedr currently has a surplus.
The budget at Ysgol Borthyn is nowhere near as healthy as that of Llanbedr, the school is already in deficit and is expected to grow to over £220k. Is there money available in the budget at Borthyn to be able to accept the pupils from Llanbedr without other spending at the school being cut? The lag between pupils joining the school and the money coming through the budget is around 18 months, which could cause Borthyn significant budgetary issues.	The proposal would result in a more equal distribution of funding within the area. The reduction in surplus places would allow funding to be released and re-distributed more directly to the benefit of the learner. Elements of the school budget that are pupil led would follow the pupil to their new provision should the proposal be implemented. Should all pupils transfer to Ysgol Borthyn this would result in an increase in Ysgol Borthyn's budget of £86k (based on the current budget 2015/2016). This would result in per pupil funding of approximately £4,058, the Denbighshire average is £3,931. Pupil led funding allows the schools to ensure there is sufficient resource for the pupils. Ysgol Borthyn have implemented a 3 year recovery plan which will see the school achieve a surplus by the 2017/2018 academic year.
In 2013 the proposed savings were £68k yet in 2015 the proposed savings are £126k. What has changed to make the difference in size of the savings?	Previously the savings made as a consequence of school organisation proposals have been based upon the saving of a head teacher salary only. This approach did not include other financial elements within the delegated budget which were non pupil led such as costs associated with the running of a school building, business support etc.
Quoting a saving for the rent of the mobile classroom (at Llanbedr) is only part of the story. It is obvious there is not enough space at Borthyn for the pupils so extra capacity would be needed, most likely by renting a mobile. This would wipe out the saving made at Llanbedr.	Should the proposal be implemented and pupils transfer to Ysgol Borthyn there would not be a requirement for an additional mobile classroom at the school to accommodate pupils.
There is an estimate of £26,000 for transporting pupils to Borthyn. At present the transport to school budget to	As detailed within consultation document relating to the proposal for Ysgol Llanfair DC and Ysgol Pentrecelyn the impact on transport is expected to be neutral with no

<p>Llanbedr is minimal around £700. In the Ruthin area alone the cost of transport is £254,000. This will only increase should the new schools be built near Glasdir, should Rhewl close and should an area school for Llanfair and Pentrecelyn be built. Proposal to close Llanbedr will increase the cost at a cost to the council.</p>	<p>significant increase of decrease.</p> <p>As detailed within the consultation document relating to the proposal for Ysgol Rhewl the impact on transport costs is expected to be neutral. The relocation of Ysgol Pen Barras and Rhos Street School has also shown that the transport impact will be neutral based on the home to school locations of pupils attending both schools.</p>
<p>Cost of returning the building to the Diocese, such as the removal of any asbestos , removing catering facilities and decontaminating the site and making it fit for return to the Diocese. Cost of this not included in the consultation document. Would reduce potential savings.</p>	<p>In previous cases there have been negligible costs associated with closure of school buildings which are subject to reverts. Most recently the closure of Ysgol Llantysilio incurred minor costs for the type of works identified by the Governing Body.</p>
<p>Using the forecast pupil numbers cost per pupil in Llanbedr would be £5,324 in 2017/2018 in line with Ruthin average. Should federation proposal be adopted it would be less as the school budget would be less.</p>	<p>Ysgol Llanbedr would remain a small school. With an increase in pupils there will be decrease in per pupil funding however due to the size of the school it would remain higher than the average per pupils spend.</p>
<p>To demonstrate proposed savings would not be reached- can't be accurate do not have necessary figures. Costs for closing outweigh potential savings. No savings from closing Llanbedr.</p>	<p>The authority has provided a document in response to the proposal to Federate and change the status of Ysgol Llanbedr which can be found here.</p>
<p>Summary</p>	
<p>Point Raised by GB</p>	<p>LA Response</p>
<p>The suggested savings by closing Llanbedr will not be achieved.</p>	<p>It is the view of the authority that savings would be made in the region of £100k as detailed within the consultation document.</p>
<p>Ysgol Llanbedr is growing, surplus places are reducing.</p>	<p>The Council has acknowledged and contained pupil forecasts that demonstrate an increase in pupil numbers at Ysgol Llanbedr.</p> <p>However, the authority must look at a wider picture. The pupil numbers in the Ruthin area have remained static, there are only so many pupils within the Ruthin area and as a whole there continues to be significant surplus places.</p>
<p>Ysgol Llanbedr is very well managed and runs with a budget surplus and is forecast to continue in surplus.</p>	<p>This view is noted.</p>
<p>Cost per pupil at Ysgol Llanbedr is falling as pupil numbers rise. They will be comparable to the area average in two years.</p>	<p>The authority acknowledged that as pupil numbers increase the per pupil funding will decrease however Ysgol Llanbedr will remain a small school and per pupil funding will remain above average.</p>

Demand for English language church in wales places at Ysgol Llanbedr and Borthyn is growing such that there is not capacity for pupils from both schools in Borthyn.	Should all existing full and part time pupils at Ysgol Llanbedr transfer to Ysgol Borthyn there would be sufficient capacity without the need to undertake significant remodelling or provide an additional mobile classroom.
There is a viable counter proposal to closure, where Ysgol Llanbedr federates with another Church in Wales school and changes status to VA. Both of which save the council more money.	The authority has provided a document in response to the proposal to Federate and change the status of Ysgol Llanbedr which can be found via this link {insert link}
The GB is strongly opposed to this proposal and is very disappointed by the lack of collaboration from the Modernising Education team and council as a whole. The position of school governor is a voluntary one and we have worked tirelessly to secure a future for the school. It is our intention to work with the diocese and the council to find and deliver a solution to secure the future of the school, whether this is through a federation, a change in status to VA, a combination of the two or to maintain the status quo.	This view is noted.

END

=====

Appendix H

Response from Estyn

Estyns' response to the proposal to close Ysgol Llanbedr Dyffryn Clwyd as of the 31st of August 2016 with pupils transferring to Ysgol Borthyn, Ruthin.

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 is by Denbighshire County Council.

It is being proposed that Ysgol Llanbedr Dyffryn Clwyd would close on the 31st of August 2016 with existing pupils transferring to Ysgol Borthyn, Ruthin.

Summary/Conclusion

The proposal is part of Denbighshire County Council's Modernising Education programme. It states the importance of addressing the challenges of surplus places, the condition and suitability of school buildings and facilities, the provision of mobile classrooms and the efficiency and sustainability of school estates. This proposal is part of a reorganisation of primary schools in the Ruthin area that began in 2013.

It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.

Description and benefits

The proposer clearly states the rationale for the proposal. The proposal has been developed in accordance with the council's investment in the modernising education programme. The proposal clearly states that primary schools in the Ruthin area face a

number of issues that could impact on the ability to sustain educational standards in the future. These include the need to address surplus places, the condition and suitability of the school buildings and facilities, the use of mobile classrooms and the efficient use of school estates and their sustainability. The proposer clearly outlines the perceived benefits of the proposal. These include the maintaining of the current standards and quality of education, the reduction in surplus places in the Ruthin area, a more balanced distribution of school funding, improved efficiency and effectiveness of the school estate and improving pupils' access to improved school buildings, facilities and resources.

The proposer clearly states the perceived disadvantages of the proposal. These include the loss of English medium faith based primary education in the village of Llanbedr Dyffryn Clwyd. Pupils may be required to travel further to their nearest school and staff may be redeployed or made redundant. The proposer states that all risks associated with the proposal will be monitored as part of the Council's Modernising Education Programmes risk management strategy.

The proposer has considered alternatives to its proposal. These include maintaining the status quo, federation or amalgamation with another church in Wales primary school, Ysgol Llanbedr Dyffryn Clwyd becoming a voluntary aided school and expansion of the current site and closure. Overall, the proposer has demonstrated clearly the advantages and disadvantages of each option and the reasons for their preferred option. The proposer has appropriately demonstrated how surplus places will be affected by providing a forecast of pupil numbers to 2020.

The proposer has appropriately considered transport issues including an analysis of costs. Transport to alternative schools will be provided in accordance with Denbighshire county council's transport policy.

The proposer has completed a useful Welsh language impact assessment. It concludes that the proposal will be neutral in terms of its impact on the Welsh language. The proposal provides parents with the option for English medium education for their children with Welsh taught as a second language. This is similar to the current position and pupil access. The current proposal provides access and maintains parental preference for language medium.

Educational aspects of the proposal

The proposer has appropriately considered the impact of the proposals on the quality of pupil outcomes, provision and leadership and management. The proposer has considered the outcomes of the most recent Estyn inspection reports and has provided the support categories and bands of both schools. It has also provided a useful range of information relating to performance outcomes. These include local, national and the family of schools who have similar levels of free school meal entitlement. During their inspection in 2009, leadership and management at Ysgol Llanbedr Dyffryn Clwyd was judged grade three (good features outweigh shortcomings) and for improving quality and standards the school was judged grade four (some good features, but shortcomings in important areas). Ysgol Borthyn was awarded an adequate judgement for leadership and management during their inspection in 2014.

The consultation appropriately raises the challenges facing small primary schools in being able to implement leadership structures effectively. The proposer acknowledges that in small primary schools, many head teachers have a significant teaching responsibility. This limits the time they can devote to leading and managing and they have fewer opportunities to evaluate standards and to drive improvement.

The proposer states reasonably that the preferred proposal would provide stability in leadership and allow Ysgol Borthyn to strengthen its leadership and management team. Ysgol Borthyn has a substantive head teacher and established senior leadership team. Ysgol Llanbedr Dyffryn Clwyd has an acting head teacher who has been in post since 2013. Since 2009 the school has had three permanent and four acting head teachers. The proposal asserts reasonably that if pupils transfer to Ysgol Llanbedr Dyffryn it is likely that pupils will have access to a broader compliment of teaching staff offering expertise in a number of different curriculum areas.

The proposer acknowledges that if the current proposal was implemented pupils with additional learning needs will be supported by the council's additional learning needs officer. Any additional learning needs support that pupils currently receive, such as 1-2-1 support, will be replicated in their new learning environment.

END

=====

ⁱ Education and Training Statistics for the United Kingdom 2013,
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101-2013.pdf

DRAFT