



Objection Report:

Proposal to Close Craigeffnparc Primary School

This report is published in line with requirements under section 49 of the School Standards and Organisation (Wales) Act 2013

Contents

1. Background 2

2. Objections to the statutory notice 3

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1. BACKGROUND

Craigcefnparc Primary School is in the village of Craigcefnparc in Swansea.

At January 2018, it had 54 full-time (FT) pupils on roll from the ages of 4 to 11, plus 2 part-time nursery children. At September 2018, there were 45 FT plus 4 nursery children on roll. At January 2019, the number on roll had dropped further to 40 FT plus 7 nursery. There are three mixed-age classes in the school. The number on roll has been declining for the last five years.

The last Estyn inspection of the school was in May 2015 with the school's performance being adequate at the time and with adequate prospects for improvement and was placed in a category of Estyn monitoring. The school was removed from Estyn monitoring in October 2016 after considerable support from the local authority and investment of time by school staff. The Estyn report can be found here: <https://www.estyn.gov.wales/provider/craigcefnparc-primary-school>

The school has a new acting headteacher since September 2018 who has had to take on a part-time teaching role to balance the school's budget.

The local authority has consulted on a proposal to close Craigcefnparc Primary School with effect from 31 August 2019. It is proposed that the current catchment area is transferred to Clydach Primary School. Transport to Clydach Primary School would be provided for all pupils living in Craigcefnparc.

Following consultation, Cabinet considered the responses received on 20 December 2018, and agreed to move the proposal forward to the publication of a statutory notice, as is required by the School Standards and Organisation (Wales) Act 2013. The notice was published on 9 January 2019 and objections were invited until 6 February 2019.

2. OBJECTIONS TO THE STATUTORY NOTICE

39 written objections were received (one of these being after the end of the objection period).

The objections were:

	Point Raised	Local Authority Response	Number of Written Responses Raising Point	% of Written Responses Raising Point
	Travel/Transport			
1	<p>The streets around Clydach Primary School are already narrow and congested. There will be additional traffic/buses. The council's own traffic assessment does not recommend the relocation of Craigeffnparc children to Clydach. No consultation has taken place with residents on proposed increased traffic and calming measures, which may not be feasible. Concern from residents in Clydach that traffic at the start and end of the school day is already an issue, and emergency vehicles would not get through the narrow and busy streets.</p>	<p>Areas around schools are usually busy at the start and end of a school day. The council had identified the need for some additional traffic measures at the Clydach site in the consultation paper (following on from a school safety assessment provided to the Welsh Government a few years ago). These will progress for 1 September 2019 regardless of the outcome of the school closure consultation, and at a cost of approximately £67k, which includes an estimate for road resurfacing that could be required. There would be three additional minibuses required if the Craigeffnparc learners were transported to site, plus some additional cars if learners did not use the bus. Clydach school have introduced a different end to the school day for the junior site and they now finish 10 minutes earlier than the infant site, easing congestion. It should be noted that there are traffic concerns at the Craigeffnparc school site as well, including issues with parental parking, and the safety assessment report to the Welsh Government identified the need for traffic calming (narrowing) and the creation of a footway at a cost of approximately £40k.</p>	31	79%

2	The public bus service is already limited and could reduce, so parents would struggle to get their children to Clydach and back, outside of home to school transport, if they did not have a car.	The public bus would not be affected by this proposal.	1	3%
3	There is no safe walking route to Clydach from Craigcefnparc. More information is needed on transport logistics. The proposal denies children the opportunity for exercise/fresh air walking to school. Increasing the traffic on the road into Craigcefnparc is dangerous.	All statutory aged pupils in the Craigcefnparc catchment area would have free transport to Clydach Primary School. The proposal is to provide three minibuses to take the learners from Craigcefnparc, with each minibus having a transport assistant as well as the driver. Bus pick up is not necessarily from home and suitable pick-up points would be arranged, with learners still having to walk to get to these points. Traffic assessments note that many children are taken to Craigcefnparc Primary School by car and do not walk.	19	49%
4	Buses will not be able to stop outside the school and pupils will have to walk from the bus stop/on the busy high street. Children would have to wait at bus stops on their own. Who is responsible for the children while on the bus? My child is being assessed for special needs so would need extra support on a bus or a taxi to school whereas we currently walk. Will a bus always be provided?	Each of the three proposed minibuses would have a passenger assistant. As well as looking after the children on each bus, he or she would be responsible for walking their group of children between the bus and the school entrance in the morning and between the school entrance and the bus in the afternoon. The passenger assistant would be responsible for the children but ultimately the local authority is responsible for the safety of all children. Parents would be responsible for taking their children to the pick-up points, as they are now to take them to school. Any child with a Statement of Special Educational Needs will have their transport requirements assessed and needs met appropriately. The council has a duty to meet the ongoing requirements of their transport policy.	10	26%

5	There will be increased CO2 emissions from the extra cars and buses travelling to Clydach. The Welsh Government have an ambition for the public sector to be carbon neutral by 2030.	Nitrogen Dioxide (NO2) is monitored across the local authority in line with guidance produced by DEFRA and the devolved administrations. The objective concentrations that we are required to assess against are unlikely to be effected by the increased traffic flows from the additional vehicles estimated for this proposal at school drop-off and collection times. The increased emissions from traffic need to be weighed against not having emissions from the oil fuelled boiler and other utilities at the Craigeffnparc school site.	7	18%
6	Difficulty in accessing school for Craigeffnparc residents in adverse weather such as snow and ice.	There are currently buses leaving the village to take learners to St. Joseph's Primary School in Clydach, YGG Gellionnen, Birchgrove Comprehensive School, Cwm Tawe Comprehensive School, YGG Bryn Tawe and Bishop Vaughan RC comprehensive. It is only on rare occasions that the weather conditions prevent these buses from running.	2	5%
7	Lone hill is suffering from subsidence on the road, which will get worse if there is additional traffic and buses. This is the only road into Craigeffnparc from Clydach.	There will not be any substantial increase in traffic. The council has a duty to keep this road open and, in the event of any subsidence, would ensure that any necessary work is undertaken.	1	3%
8	As the bus will only be provided for the start and end of the school day for statutory school age learners, children will be unable to access nursery, breakfast club or after school club/sports (unless parents arrange their own transport, adding to congestion). It is not practical for those not getting the bus to walk, as the roads are dangerous. Parents wanting to go back to work will not be able to use the wraparound provision.	The council is responsible for transporting pupils for statutory education. Parents are always responsible for getting their learners to and from any out-of-school activities such as breakfast club and after school club. However, if the consistent demand is there, it is possible for some of the minibuses to leave Craigeffnparc earlier to allow children to attend breakfast club.	13	33%
9	Some children already get a bus to Craigeffnparc school as they live on remote farms. Moving them to	Travel time to school will be within the requirements of the Learner Travel Measure for Wales.	1	3%

	Clydach will increase their travel time to school.			
	Community Impact			
10	Major impact on village and local businesses. The village will be a less attractive place for families to live and will lead to the death of a vibrant, living community. Social isolation for villagers (elderly etc.)	There are many villages in Swansea without a school. This proposal has been made for educational reasons and these must be paramount over a perceived impact on the community. There will still be a large and well-used community hall in the village. The school facilities are not used for the wider community.	12	31%
11	Parents and pupils socially interact on the walk to school and at the school gates. The school takes part in community activities such as carol concerts in the chapel. Will impact on the mental wellbeing of the community.		6	15%
12	What is the plan for the school building in the event of closure?	If the school did close then the building would be considered for other council use or put forward for disposal, including community asset transfer.	1	3%
13	If the YGG Felindre closure proposal also takes place then there will be no school in the Mawr ward at all.	There is another ward in Swansea without a school (Killay South).	1	3%
14	There is a memorial at Craigeffnparc Primary School for the murdered children of Mandy Power and removal of this memorial will cause uproar in the community.	If the school were to close then the memorial would be appropriately relocated.	2	5%
	Size of School/Number on Roll/Class Sizes			
15	Pupil projections are not correct. There is no correlation between birth rate in the area and the size of the school so this argument should not be used. The number on roll would increase if the closure threat were removed. The local authority should admit more pupils to Craigeffnparc instead of other schools that are full. The authority was incorrect when it said there had not been any applications for admission to the school.	The number on roll continues to decrease. The local authority admits all learners where parents request a place if there is space at that school. It cannot direct pupils to another school unless there is no space for them at their preferred school. The larger year groups are in Key Stage 2 (juniors) and numbers being admitted to Foundation Phase (infants) are far lower. This will lead to a declining number on roll as these pupils feed through the school. Numbers in each year group at the September 2018 pupil count were: Nursery = 4,	14	36%

		Reception = 1, Year 1 = 4, Year 2 = 4, Year 3 = 6, Year 4 = 10, Year 5 = 7, Year 6 = 13. At January 2019, Year 4 had dropped to 7 and Year 6 had dropped to 12.		
16	Small and mixed age classes are hugely beneficial to our children. The Estyn report on the benefits of larger schools was generalised. We have produced our own research and know the benefits for our own school.	Clydach also have mixed age classes, as is common in many schools, although this would only be for two year groups in a class. Craigcefnparc have Nursery to Year 2 (all of Foundation Phase) in one class, Years 3 and 4 in another class and Years 5 and 6 in another. As the larger year groups drop out from Key Stage 2 and budgets tighten, it is likely that the school will have to reduce their staffing levels and operate with just one class for the whole of Key Stage 2. This adds pressure to teaching staff who have to cover the appropriate curriculum for the learners in that wide age range with limited teaching assistant support.	7	18%
17	A larger school does not better prepare learners for comprehensive. Staffing of transition days is irrelevant. This claim was baseless.	The effectiveness of leadership and the subsequent development of effective school transition plans will determine success, as opposed to the size of the school. Estyn review reports reflect that transition planning is now a strong feature of the work of most secondary schools and their partner primary schools. Teachers now visit other schools to observe teaching and learning to help them in their planning. Planned cross-curricular learning activities between key stage 2 and 3 feature strongly in school development planning. The national focus on schools developing partnership working and school-to-school collaboration will serve to strengthen this aspect for all schools. The limited staffing at Craigcefnparc would have to support transition to secondary schools (learners can go to Birchgrove Comprehensive School in Swansea but often to Cwm Tawe Comprehensive School in Neath Port Talbot council) as well as	3	8%

		continuing to support the learners in their class in other age groups.		
18	There will be less opportunity to take part in responsible roles e.g. school council, or in sports teams. Clydach does not offer enhanced social or sporting opportunities (contrary to the consultation paper).	Larger schools are likely to have more groups to join with a wider range to interest learners. Small schools struggle with team sports where a minimum numbers of players are required. Numbers at Craigcefnparc are predicted to fall further when the larger year groups in Key Stage 2 leave and this will further limit team sports.	5	13%
19	Small school is like a nurturing family. Children enjoy going to school, as can be seen from attendance statistics. There is less bullying.	This proposal is not because the school is small, it is because the council believes that it is not sustainable and that this will impact on the education of learners, and this must be the council's main objective.	3	8%
20	Some parents prefer a small school for their children and want to have this choice.		2	5%
	Education/Standards/Leadership			
21	Objectors feel the council were too slow to provide support and bring about leadership changes in the past, which have contributed to a drop in pupil numbers. The council has not allowed governors to advertise for a new headteacher, adding to their case that the school is not sustainable. The acting headteachers are bringing about change to improve the school and should be given time to continue that work. The school should be kept open for another year to prove that it has recovered and improved.	The school has had at least four headteachers and has been categorised as a school causing concern for most (80%) of the intervening years between December 2013 and December 2018. In 2014, the school disagreed with the areas that required improvement, including the role of the governing body. As a result, there was a period between 2013-2015 where the school was unreceptive to their entitlement for support because of a refusal to accept the categorisation of a school causing concern. The local authority has supported Craigcefnparc Primary School while their substantive headteacher was absent from school by identifying a quality acting headteacher from another school and funding this post for some time. That person then independently applied for a permanent headteacher post in a larger school and was successful in getting the job. The budget	8	21%

		<p>position at the school has led to the substantive deputy headteacher acting up as headteacher but working for at least two days a week in the classroom, having the least non-contact time of any headteacher in Swansea. The budget projections for coming years highlight increased pressures on schools. It is unlikely that a headteacher will be attracted to a school with under 50 learners and that is in an 'amber' support category. During the last five years school improvement officers have worked intensively to support progress on areas for development identified by the local authority, parents and external regulators, and this high level of support stands out in comparison to other schools. Also see Appendix C of the Cabinet report on 21 March 2019</p> <p>https://democracy.swansea.gov.uk</p>		
22	<p>Craigcefnparc has been given far less advisor support days in the last academic year compared to most schools across the county.</p>	<p>The Welsh Government's guide on categorisation and support can be found here: https://beta.gov.wales/national-school-categorisation-system-guidance-parents-and-carers The local authority gives a set level of Challenge Adviser support for schools in certain categories. However, Craigcefnparc Primary School has received support, both financially and in staff time, well above this level. Despite this support, the school's recent provisional category has dropped to 'amber'. Clear support logs and resource logs evidence that the school has received more than the required support need to accelerate improvements. However, it is the school's own capacity to self-improve without external intervention that presents the biggest challenge, with a few of the areas of improvement noted in December 2013 remaining as areas for improvement in</p>	1	3%

		December 2018. Also see Appendix C of the Cabinet report on 21 March 2019 https://democracy.swansea.gov.uk		
23	<p>The school is a good school with improving standards/categorisation and should be given a chance to recover to normal pupil levels. Stating that the overall quality of education at Craigcefnparc is poor in comparison to neighbouring schools is damning yet results for Foundation Phase and Key Stage 2 are the same as at Clydach Primary School. The 'amber' regional categorisation has been quoted out of context and the previous yellow categorisation has been ignored. Clydach Primary School were also yellow.</p>	<p>The school has improved with a great deal of support from the local authority (both officer time and financial support), through the dedication of the acting headteacher (provided by the local authority) and the focusing of school staff and governors to address issues that have been identified. However the local authority's view is that this is not sustainable with reducing pupils on roll, increasing budget pressure and a new curriculum to embrace and, although the school had progressed from a 'red' to 'yellow' support category it has now dropped down to 'amber'. The school is unable to sufficiently fund the supply staff costs needed to release staff for training and this will be vital to prepare for the new curriculum. In addition, the acting headteacher is restricted to the school site in the main due to teaching commitments and leadership requirements and therefore is unable to attend professional development opportunities. The school is unlikely to recruit a headteacher for a school with under 50 learners that is in an 'amber' support category. The school has shown evidence of improvement when the local authority intervened to place a temporary headteacher in post, at a time when the school was a high-risk school. However, the current acting headteacher accepts that the school requires more support than it did previously, hence the amber categorisation in autumn 2018.</p>	10	26%

24	<p>As transport will not be provided for nursery learners this will impact on families that cannot drive, going against the council's own wellbeing policy and is an equality issue. The Council's Local Development Plan states that early years is a major priority.</p>	<p>Having a priority for Early Years does not mean keeping a potentially unsustainable school open or providing transport for nursery. Home to school transport is provided in accordance with agreed council policy. There are many schools where nursery pupils are not transported to school; however if there are spare seats on the minibuses these can be purchased by parents.</p>	2	5%
25	<p>Craigcefnparc delivers the full curriculum and will continue to do so (contrary to what was described in the consultation paper). The vast majority of pupils that leave the school are high achievers.</p>	<p>Estyn reviewed school size and educational effectiveness in their December 2013 report. The report shows that large primary schools tend to perform better than small and medium-sized schools. Curriculum provision is better in large primary schools. In small schools, there tends to be shortcomings in the provision of foundation subjects at key stage 2. These shortcomings differ from school to school, but are often linked to gaps in the expertise of staff. In these schools, there are three or more age groups in each class and teachers have to plan and deliver lessons that meet the needs of pupils from a wide age and ability range. Leadership and processes to improve quality are usually better developed in large primary schools. In small primary schools, many headteachers have a significant teaching responsibility that limits the time they can devote to leading and managing and they have fewer opportunities to evaluate standards and to drive improvement. As pupil numbers decrease and budgets reduce there will be even more pressure on reduced staffing levels to deliver the full curriculum. Any school that has required at least amber support for four out of the last five years and in a school of this size will find it difficult to deliver the breath of the current statutory curriculum.</p>	4	10%

26	Educational disadvantages for all pupils involved, as they will be taught in larger classes with less personalised learning programmes.	Teachers must set a personalised programme for each learner in their class regardless of size, and this is usually delivered with the support of teaching assistants. It is advantageous to have children of the same ability/age in a class rather than a large spread of ages in a smaller class without sufficient teaching assistant support.	2	5%
	Clydach Primary School			
27	Class sizes will increase at Clydach (yet the Welsh Government are providing £31m to try to reduce class sizes). This will have a negative impact on Clydach pupils. Objectors suggest that Clydach already struggles to provide SEN support for learners in class and that adding more children will cause more disruption. Objectors also suggest that Clydach already does not have enough reading books or tablets for all children in the class.	The maximum number of pupils in any year group in Craigcefnparc Primary that would transfer to Clydach Primary School is 7. Most classes will be able to absorb the number of learners from Craigcefnparc but there could be the need for some restructuring of classes. Foundation Phase classes cannot legally have more than 30 learners (subject to some permitted exceptions) and the aim is for Key Stage 2 classes to also be a maximum of 30. The Welsh Government grant has only been provided for a small number of schools that meet a limited set of criteria, including high levels of free school meals and/or learners from ethnic minority backgrounds. All schools are allocated funding to support learners with special educational needs and the local authority is not aware of any concerns around support for learners at Clydach Primary School. It is usual practice for learners within a class to share tablets and other resources. Clydach Primary School currently has an IT suite but their intention is to purchase additional mobile devices for the classrooms, as is the case in most other schools now that technology is progressing, releasing the IT suite room so that it is available as additional classroom space if required.	8	21%

28	Clydach Primary School have staggered their finish times between the two sites and children therefore have less education.	Children continue to have the same hours of education but they are provided at a different time during the day. This change commenced in September 2018 and has been successful in easing the traffic around the site at the end of the school day.	1	3%
29	There are less after school clubs at Clydach. Craigcefnparc has more clubs than has been quoted. Sessions at Clydach are often cancelled at short notice.	Clydach Primary runs various after school clubs for ad hoc programmes for 6 weeks at a time. Early birds club is available from 7:50 am each day. Discussion can take place on the types and number of clubs provided. Sessions are rarely cancelled and as much notice as possible would be given.	4	10%
30	During consultation there was a question from Clydach children asking if Craigcefnparc children would be well behaved. The reply was that there could be naughty children in any school. This was not reassuring for pupils in a school who would be aware of existing bullying.	This is not the case at Clydach. The school is pro-active in teaching learners about the impact of bullying as a preventative measure, and this has included talks from the community police (who attend for various other topics as well). Estyn reported that- "Nearly all pupils enjoy coming to school and feel safe. The school council is an effective forum for the pupil voice, for example in introducing anti-bullying ambassadors. Nearly all pupils are polite and well behaved. They demonstrate good behaviour during lessons, in assemblies and in the playground. Pupils show compassion for others, raising funds for a number of charities". Headteachers' termly reports to governors must contain reference to any bullying in a school. The headteacher at Clydach Primary School reported to governors on 26 March 2018 that "behaviour was excellent and there were no issues at all" and it was noted that the school was currently working on an understanding of what "bullying" actually is.	1	3%

31	There is no surplus space in Clydach. Concern that children living in Clydach will not be able to attend Clydach Primary School in future. The school capacity has nearly been reached. Parents could have children at more than one school.	The published capacity for Clydach is based on the rooms currently being used as classrooms. There are other areas that can be brought back into classroom use if required, although the majority of Craigcefnparc learners could be admitted into existing classes, as there would be a maximum of 7 learners in any year group. It should be noted that the local authority has reviewed the capacity at Clydach recently as the school felt that they could potentially accommodate all of the Clydach learners on one of their sites, and this highlights the level of surplus capacity at the school. There is no reason why parents should have children in more than one primary school.	9	23%
32	Increasing the capacity and Admission Number at Clydach will mean that rooms used for extra-curricular activities, such as the IT suite, will be taken away to turn the rooms into classrooms. The hall would need to accommodate more learners. The local authority must consult on admission numbers two years in advance.	Most schools have moved away from having an IT suite as technology has advanced and mobile devices can be used in the classroom. Clydach Primary School are already considering this as a change of provision. As the number of learners that would transfer are small (a maximum of 7 per year group) there will be a limited requirement for additional rooms to be used as classrooms. Clydach Primary School has a hall at each site and the small number of additional pupils can be accommodated. A Statutory Notice overwrites the consultation process on admissions and admission numbers.	4	10%
33	There are not a wider range of facilities at Clydach Primary School to offer greater flexibility in covering all areas of the curriculum and greater access to resources and staffing.	As Clydach is a larger school, it will have more resources and more staff with different areas of expertise, as well as the ability to support each other and provide cover.	1	3%
34	Other than Clydach, all other primary schools in this area are full or oversubscribed, giving parents no real choice.	There is space in some of the year groups in both Craigfelen and Glais Primary Schools but some of the year groups are already at Admission Number.	6	15%

35	The Local Development Plan has potential for new dwellings in the area (between 70 and 167 dwellings were quoted in various responses). This will inevitably increase the number of pupils needing school places.	For the Clydach ward, the council's figures currently forecast that around 200 additional housing units will be built by the end of 2025, a 6% increase on existing stock, below the average increase across the county (+11%). Council projections would estimate under 40 additional primary aged pupils from 200 houses and this does not take into account any 'recycling' within the area or any stock that would then become vacant. Parents also have the choice of faith and Welsh-medium in Clydach, as well as English-medium school places. However, there are no firm plans for any actual build as yet.	9	23%
36	The location and environment in which Craigcefnparc Primary is situated is far less restricted than Clydach Primary and is in a much more natural environment, with pupils often having lessons in the forest school area, which benefits their education, health and wellbeing. This cannot be offered at Clydach Primary so it would not provide an experience that is at least as good.	Outdoor learning is a requirement in the Foundation Phase. Learners at Clydach Primary have a stimulating outdoor area on the school site and also take trips to the canal, Coed Gwillim Parc, Forge Fach community centre's outdoor area, Manor Park etc. The council is working with the acting headteacher at Craigcefnparc Primary School regarding access to and the use of the nearby forest area to ensure that the relevant insurance and risk assessments are in place, and that the required authority has been gained to access the land as it is privately owned.	7	18%
	Financial			
37	There is no financial saving to be made. There will be additional costs for transport, and this money should be spent on keeping the school open instead.	This proposal has not been made for financial reasons. It is about the sustainability of educational provision for the children of Craigcefnparc.	12	31%
38	The proposal has been made for financial saving reasons. Although the council states that the proposal has not been made for financial reasons there is detailed financial analysis in the consultation documents.	There is no financial saving to the council from this proposal. The proposal is based on educational reasons. The School Organisation Code and the Cabinet process of the Council requires financial	5	13%

		information to be provided for every proposal and report.		
39	If Craigeffnparc school is not financially sustainable then the funding formula should be changed to allocate more funding. The Governing Body of Craigeffnparc refute that the school is not sustainable in the longer term. Another objector felt that as so much financial support has been given to the school in recent years that it would not make financial sense to close the school at this stage.	Giving more money to Craigeffnparc Primary School would mean taking money from other schools and learners in Swansea, as there is no additional funding available. The council has a duty to share resources as fairly as possible for the benefit of all learners. The school has only set a balanced budget in the current financial year with additional financial support from the council (£15k initially and then a further £10k when they were still unable to balance their budget) while the consultation process is ongoing. A balanced budget was still only possible because the acting headteacher had moved on to another school and the position has been filled by the deputy headteacher from September 2018 (reducing the teaching staffing by one person overall). The school is unable to fund a caretaker or any supply cover for staff, and annual maintenance of the school buildings is extremely limited. The council is unable to provide this additional £25k every year and it is predicted that the school will have to declare a staff redundancy to balance their budget for the 2019-2020 financial year. This will lead to an increased adult to child ratio at the school.	2	5%
40	Council Tax should be reduced if the school is removed from this high-paying area (compared to funding £1,584.71 more per pupil than the average for Swansea).	Council Tax is not based on access to a school and is mainly related to value of property.	1	3%
41	The consultation paper should have given an accurate figure for the toilet refurbishment.	The figure is based on an initial local authority surveyor's budget estimate. As this is only a proposal we would not seek further quotes until we are sure that work needs to progress.	1	3%

42	If backlog maintenance of the school building is irrelevant why is it mentioned? The condition ranking is the same at Clydach Primary School. What is the nature of the backlog maintenance?	This is only backing information which is expected to be included within a consultation document and has no bearing on the proposal to consult to close. The current base line figure was established in 2007, the date when the initial condition surveys were commissioned. All schools were allocated a condition category of A – D to reflect the level of maintenance required to bring them to a certain standard. The backlog maintenance figures were based on bringing all C and D rated elements back to an A/B rating, and included all professional fees and associated costs e.g. building control fees. The figures also allowed for a logical refurbishment and did not just consider individual elements. Therefore, for example in a toilet block, the value would likely reflect the cost of an overall refurbishment if appropriate, rather than just repairing and replacing the life expired elements. Each financial year the base-line figures have been adjusted in accordance with the appropriate Building Maintenance Cost Indices, to ensure figures reflected the current industry costs, and also to reflect works undertaken for example.	2	5%
43	The council should invest in schools instead of risky capital projects in the city centre.	Capital and revenue budgets are from different funding sources.	1	3%
44	New staffing costs have not been included in the financial projection or the revised cost per pupil per year.	It is difficult to predict staffing requirements at a consultation stage as parents may not all choose to take learners to Clydach primary school if the proposal to close was progressed. Staffing requirements at the new school would depend on the number of learners attending from Craigcefnparc and would be at the discretion of the headteacher and governing body at that school and not the local authority.	1	3%
	Impact on Children and Staff			

45	It is stressful for children to move schools.	The council would work with learners and would introduce a transition plan where they would visit the new school in advance of any move, as they do when they transition to secondary school.	3	8%
46	It is claimed that staff will be redeployed but as it is the governors at Clydach that will make that decision how can assurance be given?	The local authority would work with Clydach Primary School to assess additional staffing requirements and if staff can be suitably redeployed to that school as, it would assist learners with their transition to see familiar faces. If staff are unable to be placed at Clydach they can consider redeployment to other schools or service areas in the council. Some staff may wish to consider early retirement.	1	3%
47	Saying the school is poor is damning for staff already in a vulnerable position.	The staff at the school are good. It is the overall school's ability to self-improve and face the new curriculum and increasing demands that is poor.	2	5%
	Alternative Options			
48	Change the catchment area so that some of the Clydach area is taken into Craigcefnparc.	Changing a catchment area does not mean that pupil numbers would increase at Craigcefnparc Primary School. Parents can choose where they send their children and, as there would be capacity at Clydach Primary for learners, the children would be likely to remain in Clydach.	1	3%

49	<p>Federation needs further investigation. It had not been considered fully before consulting on the closure proposal. Clydach governors have only recently discussed federation, despite the council stating that discussions had taken place. The council cannot provide evidence of federation discussions with local schools under FOI. Federation of Clydach and Craigcefnparc schools is preferable to closure. The headteacher of Clydach should not be involved in the federation vote. Emails and letters sent from Craigcefnparc governors to Clydach governors have not been received by them. Craigcefnparc governors should have been invited to the presentation on federation at the Clydach governors' meeting.</p>	<p>The authority has fully considered federation as an option before consultation on the closure of Craigcefnparc but did not use its powers to 'force' federation, as it did not consider that this would be the best option. Under a federation each school continues to receive its own budget share and has applications from parents to each school. The main difference is that the federation has one governing body and the potential to have one headteacher, usually with backfill for non-teaching deputy headteachers at each site. The local authority has offered to discuss federation with many governing bodies in Swansea but it has not been possible to identify another school that wishes to federate with Craigcefnparc Primary School. Clydach Primary governors asked the local authority to attend their governing body meeting in January to explain how federation works. They then officially voted that they would not wish to pursue federation with Craigcefnparc. The headteacher of Clydach Primary School was entitled to vote on this matter. It is up to the governors of Clydach Primary School who they invite to their meetings but other schools who have discussed federation have also carried this out without others in attendance to allow for open and confidential discussions to take place. Other school governing bodies in the area have also discussed federation as an option but have chosen not to pursue this with Craigcefnparc. It is for Craigcefnparc governors to follow up on emails that they have sent to other schools/governors.</p>	14	36%
50	<p>Federation with Glais would address numbers on roll as pupils from Glais could be directed to Craigcefnparc.</p>	<p>This is not how Federation works. Under federation schools continue to admit pupils as separate schools. Children cannot be directed to another school. Parents</p>	1	3%

		will continue to apply to the school of their choice until the Admission Number for that school is reached.		
51	Open a Welsh language unit and relocate Felindre pupils.	There is a separate proposal to relocate Felindre pupils into a new build school for YGG Tan-y-lan. Pupils requesting Welsh-language provision from Craigcefnparc go to YGG Gellionnen in Clydach.	1	3%
	Process			
52	Objections are not being taken seriously. There has been predetermination and bias.	The consultation process has been carried out in accordance with the School Organisation Code and there has not been any predetermination.	6	15%
53	The Estyn report was included in the consultation papers but the follow up monitoring report, showing strong progress, was not.	The School Organisation Code only requires the last Estyn inspection report to be included.	1	3%
54	The ERW Challenge Advisor was not consulted during the process but this individual has the knowledge and understanding of the school to be best placed to give information on educational standards.	The Challenge Adviser for the school is fully aware of the closure proposal and has been fully involved in the categorisation process and case for proposed closure. She attended nearly all of the consultation meetings at Craigcefnparc and Clydach during the process. She engaged with the governors, parents and the wider community during the consultation meetings and responded to questions from these stakeholders. The Challenge Adviser notes that no governors attended SV1 (a required meeting that takes place with all schools to discuss performance). At a governor meeting they queried with the Challenge Adviser how to dispute their categorisation as they felt that the school was categorised as amber to support the authority's case for closure; however, the disagreement was never received.	1	3%
55	Challenge that the Equality Impact Assessment is flawed.	The local authority does not agree with this statement.	1	3%

56	Only councillors supporting the closure were allowed to attend scrutiny meetings. Objectors had asked for their own consultant to sit on the scrutiny committee but this was refused.	There is a formal membership of scrutiny meetings, including statutory co-opted members for which the only vacancy is for a faith school representative. If anyone on the panel declares an interest they can choose not to take part, based on legal advice.	2	5%
57	There is a covenant stating that the school is for the farming community and their children. If the school is closed the land will revert to the Somerset Trust.	Deeds have been checked by the council's solicitor and there is nothing that would prevent disposal. The proposal has not been made for financial reasons and is about the sustainability of educational provision for the children of Craigcefnparc.	4	10%
58	Statements made by parents about why they had taken their children from the school had been ignored when Cabinet decided to go to Statutory Notice.	All consultation responses were shared in full to all Cabinet members in advance of their meeting.	1	3%
59	Not considering the Wellbeing of Future Generations Act (does not take into account health of children and adults if they can no longer walk to school; removes equal access to education; prevents access to education in our own community; is only looking at present pupil numbers and not the longer term when numbers can rise)	Swansea Council acts in accordance with the Well-being of Future Generations (Wales) in all it does. Sustainable development has been a central organising principle since 2012 and each year the Council aims to further embed and build on sustainable practice. The focus is on integrating behaviour change so that the five ways of working and maximisation of each of the national well-being goals is implicit in how services operate as a whole Council. Integration - Our Corporate Plan 'Delivering a Sustainable and Successful Swansea' sets out how the organisation applies the five ways of working and maximises contribution to each of the national well-being goals. We believe this decision aligns with not only the Well-being Objective 'Improving Education and Skills' but other well-being objectives. Swansea's Local Well-being Plan prioritises Local Well-being Objectives for collective action. The achievement of Local Well-being Objectives are not threatened by this decision.	15	38%

		<p>As this body of evidence demonstrates wide ranging impacts across the well-being goals have been documented. Swansea Council considers these issues not only individually by addressing specific concerns in isolation but by considering informally the collective impact on well-being and how issues raised can impact on wider well-being. This indirectly considers the collective impact on the seven well-being goals as a set.</p> <p>Long term - The decision takes account not only of the well-being of learners currently at Craigcefnparc but the well-being of all Swansea's learners today and in the future. This includes taking account of long-term trends that inform the development of the Council's policies and strategies.</p> <p>Prevention - The Council has acted having identified adverse impacts on future learning and sustainability. This decision aims to stop or prevent problems getting worse.</p> <p>Collaboration - The consideration of impacts on social, economic, environmental and cultural well-being has been informed both by the expertise of services across our organisation and from external organisations such as the Audit Commission. Collaborative opportunities e.g. federalisation were explored as part</p> <p>Involvement- The consultation document demonstrates considerable involvement activities with those with an interest or who were affected by the proposal in a way that reflects the diversity of the population</p>		
60	<p>Inadequate consultation with children. Consultation paper difficult for children to understand, particularly nursery. Consultation meetings were only with a few children. Unclear how children at Clydach were consulted.</p>	<p>The School Organisation Code requires consultation meetings with the school council of affected schools and this has taken place at Craigcefnparc and Clydach schools. The school council members represent their peers and</p>	6	15%

		had discussed the proposal with their classmates prior to the meeting with local authority officers. Consultation papers have been issued to all learners in both schools.		
61	The proposal does not identify clearly enough the impact of the proposal on pupils with special educational needs.	The Equality Impact Assessment attached to the proposal covers special educational needs. All schools must address the needs of all of their learners and schools are funded to support learners with special needs.	2	5%
62	The Minister for Education has a clear agenda to protect small and rural schools, given their importance to those local communities.	The Welsh Government have published their new School Organisation Code and have not classified Craigefnparc as a rural school. The Code change requires an additional step to take place before the commencement of consultations where alternatives to closure are considered. The council had acted within the spirit of the new Code and had considered alternatives to closure.	1	3%
63	No visit or consultation with the community took place to produce the Community Impact Assessment. The Community Impact Assessment only considers use of the school buildings. There was no Community Impact Assessment for Clydach.	The required content of the Community Impact Assessment is laid out in the School Organisation Code. The assessment needs to consider what the school offers to the community in respect of community access (Craigefnparc school does not offer community access other than the parent and toddler group) and out-of-hours provision for learners. A well-used community centre services the village of Craigefnparc. The assessment also covered community use of the Clydach school building.	8	21%
64	No consultation was attempted with the school to secure the Small and Rural Schools Grant. Why isn't Craigefnparc on the list of small and rural schools produced by the Welsh Government? The bids that the working party wish to submit could have supported the school remaining open. Why was the first bid to the Welsh Government rejected?	The local authority is required to submit bids for this grant as it is a local authority grant and not a school grant. As noted above, Craigefnparc Primary School is not on the Welsh Government's list of rural schools. The criteria for submitting bids is limited and the Welsh Government did not feel that the local authority bid for FY2017-2018 met this criteria, although the	4	10%

		<p>local authority would still argue the case. The local authority was successful in bidding for a feasibility project in FY2018-2019 so that a full business case can be worked up with the governing body with a view to submitting bids for the grant for FY2019-2020.</p> <p>Authority officers have also offered to support the working party in their bid to establish wraparound at the school, although this offer has only recently been taken up.</p> <p>It should be noted that the local authority were successful in bidding for this grant in FY2018-2019 to provide supply cover to assist staff at Craigcefnparc to attend training and professional development.</p>		
65	<p>No formal meetings were held for the community, only drop-in sessions which put off some residents from attending. The drop-in session style should not have been piloted in Swansea for a school closure proposal. The scribbled notes would not have been able to be shared in any meaningful way.</p>	<p>The School Organisation Code does not require that meetings are held. Many local authorities hold drop-in sessions. All notes taken were transcribed in full for Cabinet members to view and points raised were included in the Consultation Report.</p>	3	8%
66	<p>Questions have not been answered during the consultation period. FOIs have had to be submitted but answers were not fully provided or timely. Questions were not answered at the drop-in sessions, they were just recorded.</p>	<p>The drop-in sessions allowed the views of the public to be recorded. Answers were provided where they were known. All questions raised in the formal consultation period have been answered in the Consultation Report that has been widely shared. All FOIs have been answered. If those requesting information under FOI are not happy with the response given there is a clearly identified process to follow but there has been no follow up process evoked.</p>	1	3%
67	<p>Cabinet members should have visited Craigcefnparc and Clydach before voting. Cabinet members should have met with the community.</p>	<p>This is not required by the School Organisation Code; however, Cabinet members are familiar with the area and the schools. Educational and other statistics have been presented in the Cabinet reports and consultation paper.</p>	9	23%

68	The distance between the schools in the consultation paper has been challenged.	"About a mile" is a quote from Estyn and is to give a background to those not from the area on the rough location of the school in relation to the town of Clydach. The schools are 1.8 miles apart by road.	1	3%
69	The lack of a permanent headteacher should not be used as a reason to close the school.	The governing body have been unable to appoint another headteacher while the substantive headteacher that they appointed was still in post (but not in work), as a school cannot employ two headteachers.	1	3%
70	One objector felt that an officer of the council had a [tenuous] link with the village and should not have been involved in the process.	The Director of Education is fully satisfied that officers involved in the process have no interest that should have been declared.	1	3%

All objections have been made available in full for Cabinet to view.