

BRIDGEND COUNTY BOROUGH COUNCIL

CONSULTATION REPORT

REPORT OF THE DIRECTOR OF EDUCATION AND FAMILY SUPPORT

**PROVISION FOR PUPILS WITH ADDITIONAL LEARNING NEEDS (ALN):
OUTCOME OF CONSULTATIONS ON PROPOSAL FOR CHANGES TO PIL
PRIMARY SCHOOL**

1. Purpose of Report

- 1.1 The purpose of this report is to inform of the outcome of the consultation on the proposals to close the moderate learning difficulties (MLD) learning resource centre provision at Pil Primary School.

2. Connection to Corporate Improvement Plan / Other Corporate Priorities

- 2.1 These proposals are related to the Corporate Plan (2016-2020) and the Education Inclusion Programme and, in particular, in the Corporate Plan Improvement priority one:
- Smarter use of resources

3. Background

- 3.1 These proposals also relate to the Educational Inclusion Strategy which was agreed by Cabinet in March 2009. Within that policy it states the desire for all our schools and education providers to be inclusive – learning communities that value diversity and that can accommodate as wide a range of needs as possible. It also states the belief that the needs of the overwhelming majority of school-age learners can and should be accommodated in local schools that are properly equipped and fit for purpose, and that reflect the diverse strengths of the communities they serve.
- 3.2 There has been a successful approach by the Inclusion Service in training staff in schools to support pupils with moderate learning difficulties. Staff is far better equipped to identify needs at an earlier stage and support pupils with moderate learning difficulties through a differentiated curriculum in mainstream classes, rather than placing children with these difficulties in a separate unit. However, there is also sufficient alternative provision within the County Borough for those pupils with moderate learning difficulties who are unable to access mainstream classes and need to make use of a separate learning resource facility.
- 3.3 The Council supports the principles that, when possible, children should be educated within a mainstream school environment as near to their home as possible.

4. Current situation / proposal

- 4.1 In order to progress the proposal to close the moderate learning difficulties (MLD) learning resource centre at Pil Primary School consultation exercises were carried out between 16 March 2016 and 28 April 2016 with staff, governors, parents and pupils of Pil Primary School and also the wider community in accordance with the Statutory School Organisation Code.

A copy of the consultation document was also made available during this time on the Council's website:

<http://www1.bridgend.gov.uk/services/consultation/hub/pil-primary-consultation.aspx>

<http://www1.bridgend.gov.uk/cy/gwasanaethau/ymgynggori/hub/ysgol-gynradd-y-p%C3%AEI-ymgynggori.aspx>

- 4.2 The consultation document invited views and opinions to be submitted in respect of the proposal.
- 4.3 Under the Statutory Code referred to above the Authority is required to publish a consultation report summarising any issues raised by consultees and the Authority's response and setting out Estyn's view of the overall merit of the proposals.
- 4.4 If approved by Cabinet, the next stage of the process is to publish a statutory notice outlining the proposals which would need to be published for a period of 28 days and any formal written objections would be invited during this time.
- 4.5 If there are no objections during the Public Notice period then the proposal can be implemented with Cabinet's approval.
- 4.6 If there are objections at this Public Notice stage, an objections report will be published summarising the objections and the authority's response to those objections. Cabinet will need to consider the proposal in light of objections. Cabinet could then accept, reject or modify the proposal.

5. Summary of Written Presentations

- 5.1 Key points from the consultation exercises were as follows, with full details appended at the end of this report.

Pupil Consultation

- 5.2 Pil Primary School Council met with BCBC representatives on 22 March 2016 to discuss the proposal. (Full details can be found in Appendix i)
The Local Authority response is as follows:
- 5.3 Pupils raised questions regarding what will happen to the one pupil in the class; the other pupils who access the class and why Pil was chosen.

The Local Authority response is as follows:

- 5.4 It was explained that the one pupil would have support from Cynffig Comprehensive in September on transition to secondary School and the other pupils could receive support from the Inclusion Service as not all schools have a MLD class. It was highlighted that Pil was chosen based on data; need and where pupils live.

Parent Consultation

- 5.5 A consultation meeting was held for parents and interested parties to discuss the proposal with BCBC representatives at Pil Primary School on 22 March 2016. (Full details can be found in Appendix ii)

The Local Authority response is as follows:

- 5.6 Parents expressed a desire for the class to remain because of the possibility of their child attending.

The Local Authority response is as follows:

- 5.7 An explanation was given to the parents regarding that there is only one pupil in the class currently who will transition to Secondary School in September 2016.

School Staff Consultation

- 5.8 A consultation meeting was held with Pil Primary School staff on 22 March 2016 (Full details can be found in Appendix iii)

The Local Authority response is as follows:

- 5.9 Staff raised questions regarding the selection of Pil; the resource being used by other pupils and the change in criteria.

The Local Authority response is as follows:

- 5.10 It was explained that the selection of the MLD class to close at Pil was based on data and that there were still places available across the locality.

- 5.11 It was emphasised that the Inclusion Service provided support and attendance at the ALN Request for Help meetings was encouraged.

- 5.12 An explanation was given regarding the fact that criteria had been looked at carefully and that it was appropriate in line with other local authorities.

Governing Body Consultation

- 5.13 A consultation meeting was held with Pil Primary School on 22 March 2016 (Full details can be found in Appendix iv)

The Local Authority response is as follows:

- 5.14 The governor asked a question around staffing.

The Local Authority response is as follows:

5.15 Procedures were explained by HR.

Summary of Written Presentations

5.16 There were 2 items of direct correspondence received during the consultation period.

5.17 The one respondent stated that they would like to see the moderate learning difficulties remain open as their child and other children would benefit from this class

5.18 The local authority's response to this would be that the Inclusion service provides support for pupils and training for school staff. Not all schools have a MLD class.

5.19 The other respondent stated that the reason for the decline in MLD provision is as a result of the change in criteria for MLD classes.

5.20 In response to this comment criteria had been looked at carefully and it is appropriate and in line with other local authorities

6. The view of Estyn, her Majesty's Inspectors of Education and Training in Wales

6.1 Estyn has considered the educational aspects of the proposals. (See Appendix (v).

6.2 It is Estyn's opinion that they are not able to assess with sufficient rigour the likelihood of the proposal to maintain the standard of education provision in the area. This is because the proposal does not provided sufficient information about pupil standards and the quality of provision and leadership in the two schools to which the local authority proposes to send pupils with learning difficulties from Pil Primary School.

6.3 As a response to this comment the National Categorisation School Reports for Corneli and Cefn Cribwr Primary Schools are attached at Appendix (vi) and Appendix (vii). The moderate learning difficulties classes have been in existence in both schools for several years.

6.4 Estyn states that the proposer has given a clear rationale for the proposal, based on the very few pupils currently in the resource class, and the apparent availability of places in similar classes in other schools in close proximity.

6.5 The comment from Estyn regarding disadvantages to the proposal is that the local authority makes no broader consideration of possible disadvantages, such as increased travel times for pupils

6.6 The local authority's response to this would be that Pil Primary, Cefn Cribwr Primary and Corneli Primary are within a 2 mile radius.

6.7 Estyn comments that when considering future provision, the proposal considers only the number of places that may be available to pupils from Pil Primary in other local resource classes in September 2016, and not beyond. It

is therefore not possible to assess whether there will be sufficient places for pupils from Pil Primary in these other resource classes beyond this date.

- 6.8 In response to this comment there is prediction data attached at Appendix(viii)
- 6.9 Estyn states that the local authority has considered suitably the impact of learner travel arrangements at the current time.
- 6.10 In response to Estyn regarding the fact that the Local Authority has not considered the accessibility of out of hours, extra-curricular activities. The local authority does not provide transport for any child for out of hours or extra-curricular activity.
- 6.11 Estyn comments that the proposal does not create further surplus places in any of the schools named. However, it does reduce the number of places for pupils with moderate learning difficulties in the local area.
- 6.12 The local authority's response to this would be that there has been a successful approach by the Inclusion Service in training staff in schools to support pupils with moderate learning difficulties. Staff are far better equipped to identify needs at an earlier stage and support pupils with moderate learning difficulties through a differentiated curriculum in mainstream classes, rather than placing children with these difficulties in a separate unit.
- 6.13 It is Estyn's view that the proposal deals exclusively with learners from vulnerable groups. As projected numbers appear to indicate that there will be no learners in the resource class at Pil Primary School next year, the local authority assumes suitably that there will be no significant impact on vulnerable learners.
- 6.14 As there will be no learners in the resource class at Pil Primary from the end of this academic year, it would appear that there would be no disruption to learners in the short term.

7. Impact Assessments

7.1 Community Impact Assessment

There is no significant negative impact on the community.

7.2 Equality Impact Assessment.

An initial EIA was undertaken. The full EIA can be found in Appendix (ix) The full EIA holistically evaluates the pupils affected by the introduction of the proposal.

8. Financial Implications

- 8.1 There are projected full year savings of £45,000 from the closure of the MLD Learning Resource Centre at Pil Primary School.
- 8.2 Savings will be re-allocated within the Primary Schools ISB (Individual Schools Budget) to fund continuing Learning Resource Centre provision within other primary schools in Bridgend.

9. Statutory Process in Determining Proposals

9.1 Provisional Timetable:

| | |
|------------------|--|
| 10 May 2016 | Report to Cabinet on the outcomes of the consultation. |
| 24 May 2016 | Publish Consultation Report on BCBC website, hard copies of the report will be available on request. |
| 25 May 2016 | If agreed by the Cabinet of Bridgend County Borough Council, a Public Notice will be published and there will be a period of 28 days in which to submit any objections to the proposal in writing. |
| 22 June 2016 | End of Public Notice period. Cabinet will consider any objections and make decision based on all the information available. |
| 1 September 2016 | Potential Implementation |

Hard copies of this report are available on request.

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**Consultation Meeting with
 School Council
 Re. Proposal to change the
 Provision for Pupils with Additional
 Learning Needs (ALN) at Pil Primary
 School
 22 March 2016 - 2.30pm**

Present: Michelle Hatcher Group Manager - Inclusion Service
 Headteacher – Pil Primary
 1 Teacher
 Members of School Council

Michelle Hatcher introduced the consultation session and set out the purpose of the meeting, nature and process of the consultation and outlined the proposal.

Questions/Issues

Answer/Comments

What about all the pupils in the class?

Not all schools have a MLD class. There is a checklist that we have to use to place pupils in a class. The school has used the resource to support the pupils in school but not all schools have a class to be able to do that.

Why this one at Pil Primary School?

It is based on data and on need and where pupils live. There should be 15 pupils in a class. There is currently 1 pupil. If the class closes, the money will be used to support pupils with needs in a different way.

Will you change your mind?

There is a process that has to be followed. A cabinet report will be written based on the facts. I don't make the final decision; Cabinet makes that decision.

What is the point in closing the class down? Pupils are happy doing extra things in the class.

Other schools do not have the class. They support pupils in different ways. There is only one pupil here that has met the criteria to be in the class and that pupil is moving to Secondary School in September.

What if somebody came in September?

All the applications are already in for September. There are still 10 spaces left in Corneli and Cefn Cribwr Primary Schools.

What will happen to the one pupil in the class?

The one pupil is in Year 6 and will have support in Cynffig Comprehensive School. There are similar classes in Cynffig School to be able to support that pupil.

**Consultation Meeting with
Parents
Re. Proposal to change the
Provision for Pupils with Additional
Learning Needs (ALN) at Pil Primary
School
22 March 2016 - 5.30pm**

Present: Michelle Hatcher Group Manager - Inclusion Service
Julie Jones, Senior HR Advisor
Headteacher – Pil Primary School
1 School Governor
2 Parents

Michelle Hatcher introduced the consultation session and set out the purpose of the meeting, nature and process of the consultation and outlined the proposal.

Questions/Issues

We want the MLD class to stay here for when our child moves up in the school.

We want our child to stay in this school as she may be able to remain in this school and access MLD provision.

Answer/Comments

There is only 1 pupil in the class. Pupils need to meet the criteria. Other schools do not have MLD classes. Support from the Inclusion Service is provided. Individual need is important.

An offer was made to parents to meet to discuss their child's individual needs outside of the meeting.

**Consultation Meeting with
 Staff
 Re. Proposal to change the
 Provision for Pupils with Additional
 Learning Needs (ALN) at Pil Primary
 School
 22 March 2016 - 3.30pm**

Present: Michelle Hatcher Group Manager - Inclusion Service
 Julie Jones, Senior HR Advisor
 Headteacher – Pil Primary
 11 Members of Staff
 Unions: Neil Birkin - GMB
 St John Redmond - NUT

Michelle Hatcher introduced the consultation session and set out the purpose of the meeting, nature and process of the consultation and outlined the proposal.

Questions/Issues

Sad moment. Class running 25 years. Saw remarkable job done. Pil is a challenging area. The teacher has been with the class for many years. Things have to move forward, I understand. Is it all or selective MLD with this exercise?

A final point. A child in need. The school are now using resources here and will they now be integrated into regular classes?

I am concerned about how pupils would cope outside of the MLD class and the shift in criteria. We know pupils are not in there officially and we know pupils out there who should meet criteria. The children who do meet criteria. It is parental choice to keep a child in this school. We have built up trust with

Answer/Comments

The decision has been based on data. Needed to be sure of data for September, There is one pupil in the class. We do recognise the good work but need to look at need across the authority. The process started with the facts and figures. There are still available places across the locality having received all applications.

The school can use the services available within Inclusion. The ALN request for help meetings encourage schools to attend to discuss needs and the service will support. There are services to support so the right person from the school goes with information and a professional makes determination.

The criteria has been looked at carefully and has been set. If pupils are not being supported – need to look at it. The criteria is appropriate for pupils to go in and is in line with other authorities. Please call on Inclusion services. We are here to support.

parents. The pressure put on every one of the teachers is immense.

We do. When every hour of support is taken up with that pupil, you can say that support is taken away from other pupils.

Possible rise in referrals for behaviour support. Permanent exclusions could rise. I feel that if pupil has been in MLD, they wouldn't have been excluded.

Does Corneli have Foundation Phase provision? Need to look at school's Foundation Phase into KS2, so pupils are settled and school life is continuous. Losing pupils we are not going to see them through transition.

Every school I would say, need a provision from Foundation Phase to KS2.

What has Corneli got?

If you have identified Corneli, you need to put it through Foundation to KS2. Cefn has capacity for 15?

There are similar schools in the area who don't have MLD provision either. I need to look at the whole as a local authority on a needs basis. I meet with the ALNCos on a termly basis.

It is not just Pil, it's across the authority. There is an increase in exclusions. I can't say there has been an increase in behaviour referrals from a school where a MLD class has closed. There is increased provision. Behaviour and Wellbeing team now come under The Bridge. There is KS2 at The Bridge.

This is not a money saving exercise. This resource will be used across the services. We need to look at Foundation Phase and Nurture. We are currently funding £45k for one pupil in the MLD class at Pil Primary School.

There are 10 spaces spare in September. It is continuously looked at and difficult to predict future need.

**Consultation Meeting with
School Governors
Re. Proposal to change the
Provision for Pupils with Additional
Learning Needs (ALN) at Pil Primary
School
22 March 2016 - 4.30pm**

Present: Michelle Hatcher Group Manager - Inclusion Service
Julie Jones – Senior HR Advisor
Headteacher – Pil Primary
T House (Vice Chair)

Michelle Hatcher introduced the consultation session and set out the purpose of the meeting, nature and process of the consultation and outlined the proposal.

Questions/Issues

If there is only one child in the unit, what would happen to the Teacher?

Answer/Comments

This would be dealt with via an agreed process. Letters have gone out to all staff asking for interest in voluntary redundancy and only one response has come back so far. The Governing Body is part of this process so the relevant committee will be involved.

Estyn's response to the proposal to change the provision for pupils with additional learning needs at Pil Primary School.

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 Bridgend County Council.

The local authority proposes to close the resource class for pupils with moderate learning difficulties at Pil Primary School.

Summary/ Conclusion

Estyn is not able to assess with sufficient rigour the likelihood of the proposal to maintain the standard of education provision in the area. This is because the proposal does not provide sufficient information about pupil standards and the quality of provision and leadership in the two schools to which the local authority proposes to send pupils with learning difficulties from Pil Primary School.

Description and benefits

The proposer has given a clear rationale for the proposal, based on the very few pupils currently in the resource class, and the apparent availability of places in similar classes in other schools in close proximity.

The proposer sets out advantages for the proposal in terms of financial savings only, and does not considered well enough other, wider benefits. The local authority does not consider the disadvantages of the proposal well enough. It states only that, 'There will not be a separate MLD unit that can accommodate 15 pupils at Pil Primary School'. It makes no broader consideration of possible disadvantages, such as increased travel time for pupils.

The local authority appears to consider the risks associated with the proposal suitably, and makes appropriate comment on how the risks may be minimised. However, when considering future provision, the proposal considers only the number of places that may be available to pupils from Pil Primary in other local resource classes in September 2016, and not beyond. It is therefore not possible to assess whether there will be sufficient spaces for pupils from Pil Primary in these other resource classes beyond this date.

The local authority has considered suitably the impact of learner travel arrangements at the current time. However, while the proposal does state that the local authority will provide travel for eligible pupils to resource classes in other schools; it does not appear to have considered the possible impact of travel on this vulnerable group of learners. For example, would they be able to access out of hours, extra-curricular activities?

The proposal does not create further surplus places in any of the schools named. However, it does reduce the number of places for pupils with moderate learning difficulties in the local area.

The local authority has taken sufficient account of the impact of the proposal on Welsh medium provision. This would appear to be negligible, as none of the schools mentioned in the proposal teaches Welsh as a first language, and all teach Welsh as a second language.

Educational aspects of the proposal

The proposer does not consider the impact of the proposal on the quality of outcomes, provision and leadership and management sufficiently well. Neither does the local authority consider the likely impact of the proposals to ensure delivery of the full curriculum at the Foundation Phase and key stage 2 well enough. This is because, while the report considers in good detail each of these elements in Pil Primary School, the local authority provides no information on the two other schools to which it proposes to send pupils with learning difficulties from Pil Primary in the future.

The proposal deals exclusively with learners from vulnerable groups. As projected numbers appear to indicate that there will be no learners in the resource class at Pil Primary School next year, the local authority assumes suitably that there will be no significant impact on vulnerable learners.

However, as pupils' standards and the quality of provision and leadership in the two other schools are unknown, Estyn is not able to consider the impact of the proposals on this vulnerable group of learners in future years well enough.

As there will be no learners in the resource class at Pil Primary from the end of this academic year, it would appear that there would be no disruption to learners in the short term.

Quality and Standardisation Group

Grŵp Ansawdd a Safoni

National Categorisation School Report 2015 / 2016
(Provisional pending National Verification)

| Quality Assurance | |
|-------------------|--|
| Reg. Mod | |
| Nat. Ver | |

| | |
|----------------|--------------------------------|
| School: | Corneli Primary School |
| Region: | Central South Consortium (CSC) |

Step 1 - Standards

Based upon the National Categorisation for standards the school is in standards group: 3

School Context

- The percentage of pupils eligible for free school meals (e-FSM) in 2014-2015 was 30.2%, (local authority (LA) 21.2%, Wales 19.6%) compared with 30.45% in 2013-2014, when the school moved from group 5 to group 4, and 32.78% in 2012-2013.
- The school houses a 14 place learning resource base (LRB) in key stage 2 for pupils with moderate learning difficulties.
- The percentage of pupils with a special educational need (SEN) both at school action (18.7%) and school action plus (17.5%) is higher than local and national averages.
- There were 37 pupils in the Year 2 cohort and 55 pupils in Year 6.

Key Strengths

The challenge adviser agrees with the school's self-evaluation and analysis of performance which identifies the following:

- In the Foundation Phase, pupils who have been at the school from entry until the end of the key stage, make good progress against their on-entry baseline scores at both the expected level and expected level plus 1, (47% of pupils had scores below the expected range at baseline while 92% achieved outcome 5+, and 8% of pupils had scores above the expected range at baseline while 27% achieved outcome 6). Performance has improved in the Foundation Phase outcome indicator (FPOI) over the last 4 years.
- In key stage 2, disaggregated data shows that performance has improved in English and the core subject indicator (CSI) over the last 3 years. Performance of more able pupils (L5) has improved in English and mathematics.
- Pupils with SEN in both key stages, including those in the LRB, make good progress against their prior attainment.
- The gap in attainment between e-FSM and non FSM pupils has closed at Foundation Phase and reduced at key stage 2.

Areas for further improvement

The School has, correctly, identified the following areas for improvement which senior leaders, governors and the challenge adviser agreed represented areas for improvement:

- The pace of improvement in mathematics has been slower than that in English and performance in mathematics, particularly of girls in Foundation Phase and boys in key stage 2 is not strong enough.
- Performance at higher levels, as indicated in national test outcomes and teacher assessment outcomes, and particularly in science, (a drop from 40% in 2012 to 21% in 2015) is not strong enough.
- While attendance has improved slightly (by 0.8% to 93.6%), the school has fallen to the fourth quartile.

The challenge adviser also highlighted other areas where performance is not yet strong enough:

- In the Foundation Phase, standards in language, literacy and communication (LLC), mathematical development (MD) and the FPOI have remained static with no improvement over the last three years.
- The performance of e-FSM pupils is lower than that of non-FSM pupils in LLC and the FPOI at O5+ and in all areas at O6. Underperformance of e-FSM pupils is greater at higher levels.
- In Key Stage 2, the performance of e-FSM pupils is lower than that of non-FSM pupils year on year at both L4+ and L5, and, while the gap has reduced, it remains too wide.

Step 2 – Improvement Capacity

The categorisation based upon evidence and discussion at Step 2 is C because:

Key strengths in leadership and teaching and learning

- Self-evaluation is thorough and leaders and staff are clear about the priorities that need to be addressed.
- Most staff have a shared understanding of the characteristics of excellent and good teaching.
- Teachers have improved their analysis of attainment data to identify specific areas of weakness and they plan strategies accordingly.
- Strong progress has been made in challenging and engaging all learners, particularly the more able; for example, in pupils' extended writing.
- All teachers have undertaken a termly self-evaluation of their teaching skills and identified areas to improve. Monitoring evidence shows all lessons observed were judged to be good or better.
- Coaching triads are beginning to have a positive impact on outcomes; for example, Foundation Phase teams have worked closely together to develop shared learning zones.
- Well-led by the chair, governors have a good understanding of the school's strengths and areas for improvement.
- Leaders and staff demonstrate commitment to, and engagement with, action planning for improvement.

Areas for improvement

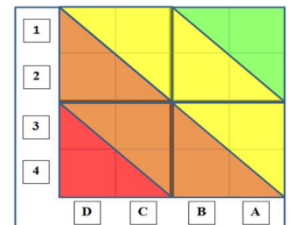
- The identification and sharing of effective practice are in early stages of development and are not yet systematic enough.
- The senior leadership team does not yet use data well enough to identify whole school strategic priorities or to evaluate their actions.
- While members of the senior leadership team are beginning to hold teachers more accountable for the progress of pupils in their classes, their role in raising standards is underdeveloped.
- While a high priority is given to performance management and staff development, professional development activities are not always linked closely enough to school improvement priorities.
- There are undue variations across the school in the quality and quantity of pupils' work, the implementation of assessment strategies and provision in the Foundation Phase.

Estyn judged the school to have made insufficient progress in relation to the recommendations following the core inspection in June 2014, and it is to remain in Estyn monitoring for a further six months.

An action plan is in place to address all areas for improvement

Evidence scrutinised to make the judgement

- Governors' evaluation against categorisation matrix
- Whole-school performance data over the last three years including national benchmarking data and the all-Wales core data sets
- National literacy and numeracy test data
- The school's self-evaluation report
- The school's improvement plan
- The school's Estyn follow-up report from September 2015
- The challenge adviser's previous school improvement report, notes of school visit and progress reports.
- Notes of visits to the school



Exceptions have been applied: No

Step 3 – Support Category

The support category for the school is judged to be amber.

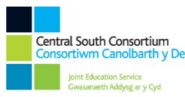
The new senior leadership team are open to challenge and are fully engaged with external support.

Categorisation Overview

| Step 1 | Step 2 | Step 3 | Exceptions applied |
|--------|--------|--------|--------------------|
| 3 | C | Amber | No |

The judgements at Step 2 and Step 3 are provisional until national verification has been completed.

This categorisation report will be shared with Governing Body after the national verification meeting on: 7th and 8th January 2016



Llywodraeth Cymru
Welsh Government



ADEW

Quality and Standardisation Group

Grŵp Ansawdd a Safoni

National Categorisation School Report 2015 / 2016 (Provisional pending National Verification)

| Quality Assurance | |
|-------------------|--|
| Reg. Mod | |
| Nat. Ver | |

| | |
|---------------------------|--------------------------------|
| School: | Cefn Cribwr Primary School |
| Region: | Central South Consortium (CSC) |
| Challenge Adviser: | Philip Buxton |

Step 1 - Standards

Based upon the National Categorisation for standards the school is in standards group 3.

School Context

- The percentage of pupils eligible for free school meals (e-FSM) in 2014-2015 was 26.0%, (CSC 21.4%, Wales 19.6%) compared with 25.7% in 2013-2014 and 27.0% in 2012-2013.
- The percentage of pupils on the Additional Learning Needs (ALN) register is 24.5%.
- There are no pupils at stages A-C on the national language acquisition scale for English as an additional language (EAL).
- There were 18 pupils in Year 2 and 9 pupils in Year 6 in 2014-2015.
- The school has three learning resource bases (LRBs), two in Foundation Phase and one in key stage 2.
- There were 16 mainstream pupils in Year 2 and 6 pupils in Year 6 in 2014-2015.
- The school was last inspected in January 2014. The summary grades were good/good.
- There are plans to federate the school with Afon Y Felin Primary School in January 2016.

Key Strengths

The school's analysis of its performance correctly evaluates the following as strengths:

- In Foundation Phase (mainstream), at outcome 5+, standards in language, literacy and communication (LLC) are good. Within its benchmarking group the school has been in quarter 1 for the past three years. The three-year average stands at 97.9%, which is above the family, local authority and Wales averages.
- Similarly, for the mainstream, the foundation phase outcome indicator (FPOI) has been in quarter 1 or 2 for the past three years. The three-year average stands at 95.8%, which is above all other indicators.
- The three-year average for mathematical development (MD) stands at 95.8%, which is above all other indicators.
- The three-year average for personal and social development (PSD) is 97.9%, again above all other indicators.
- In key stage 2 (mainstream), at level 4+, standards in English are good. The school has been in quarter 1 for the past three years.
- Standards in science in key stage 2 (mainstream) are also good at level 4+. The school has been in quarter 1 for the past three years.
- The national test results are good. In Foundation Phase, all mainstream pupils achieved a standardised score of 85+ in the reading, numeracy procedural and numerical reasoning tests.
- A similar pattern exists for the national test results in key stage 2. For the reading and numeracy procedural test, all cohorts, except year 6, are in benchmarking quarter 1 at 85+ and quarters 1 or 2 at 115+.

- When comparing the school's performance over a three-year period, it is outperforming the family, local authority and Wales in all areas.
- The school exceeded the Fischer Family Trust 'high' estimates in both English and science.
- In the core subjects, all pupils made at least two levels of progress between Foundation Phase and key stage 2. In addition, two pupils in mathematics and three pupils in science achieved three levels of progress.
- Targets for both key stages are ambitious. For example, in key stage 2, 100% of mainstream pupils are targeted to achieve level 4+ in all areas for the next three years.
- The pupils in the learning resource base classes are making very good progress in all areas as evidenced by the B Squared data.

Areas for further improvement

Appropriate attention is given to the following areas for improvement:

- Standards at the higher levels are not as good as in the last few years.
- In Foundation Phase, at outcome 6+, the school is in quarter 3 for LLC and MD and in quarter 4 for PSD.
- In key stage 2, at level 5+, the school is in quarter 3 for mathematics, having been in quarter 2 in 2013 and 2014. It is in quarter 4 for English and science.
- The achievement of pupils who are e-FSM has been inconsistent over the past three years.
- Attendance has improved over the past three years and now stands at 94.1% (2014 figure). However, this still leaves the school in quarter 3 of the benchmarking group for similar schools.

Step 2 – Improvement Capacity

Based upon scrutiny of evidence and discussion at the review, challenge and support meeting the headteacher, governors and the challenge adviser agree that the capacity to bring about improvement is B. This because:

Key strengths in leadership and teaching and learning

- The school's leaders and staff have a shared vision and a clear strategy that has improved outcomes for most learners.
- Self- evaluation is regular and thorough in most areas. Leaders plan and implement change and sustain improvement successfully in most respects. They enable staff and other partners to participate well in the change process.
- Leaders and staff are clear about the priorities that need to be addressed in the school's improvement plan. Action, and the use of resources, is effective in securing improvement in key indicators for most pupils including for pupils eligible for free school meals and other vulnerable groups.
- There has been sustained improvement against most of the recommendations from the previous inspection which formed the core of the school's priorities.
- There is a clear emphasis on raising standards. Through its targets the school has high expectations for the achievement of its pupils.
- Leaders and staff take advantage of opportunities to work with schools and other partners. Collaboration is developing well and makes an important contribution to capacity building and improvement.
- The school gives good attention to national and local priorities and in general implements these effectively.

Areas for improvement

The headteacher and senior leaders continue to be open to challenge and set their sights on continuous improvement. They are committed to developing the quality of learning and teaching and recognise that:



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Welsh Government



ADEW

- the proportion of excellent teaching is not yet quite as high as it might be;
- distributive leadership is underdeveloped and staff are not fully aware of their roles and responsibilities within the whole school self-evaluation cycle;
- assessment for learning strategies are not fully embedded across the school.

The school's leaders and governors have chosen rightly to focus on the following priorities in 2015-2016:

1. Improve standards in numeracy across the school.
2. Improve standards in literacy across the school.
3. To develop listening to learners and pupil participation.
4. Ensure that systems for monitoring, evaluating and reviewing the work of the school are rigorous enough and are used more effectively to provide clear direction for school improvement.
5. To improve standards in Literacy and numeracy through the use of ICT.
6. To move towards Federation successfully.

Evidence scrutinised to make the judgement

- Whole-school performance data over the past three years including national benchmarking data and the all-Wales core data sets.
- Data at individual pupil level including the performance of specific groups of pupils such as e-FSM pupils and pupils with EAL and value-added data.
- National literacy and numeracy test data.
- The school's self-evaluation report.
- The school's improvement plan.
- The school's inspection report from January 2014.
- The school's analysis of the outcomes of classroom observation and book scrutiny.
- The challenge adviser's previous school improvement report and notes of school visit.

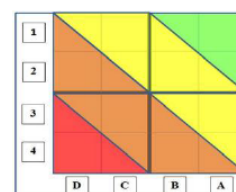
Exceptions have been applied: No

Step 3 – Support Category

It was agreed at the meeting that the support category is yellow. The school will take steps to increase the proportion of excellent teaching and develop pupil voice so that pupil have a greater say in their own learning. There will be a stronger focus on improving outcomes for eFSM pupils. Distributive leadership will also be further developed this year, so that a robust MER cycle is in place.

Categorisation Overview

| Step 1 | Step 2 | Step 3 | Exceptions applied |
|--------|--------|--------|--------------------|
| 3 | B | Yellow | No |



The judgements at Step 2 and Step 3 are provisional until national verification has been completed.

This categorisation report will be shared with the governing body after the national verification meeting on: (7 and 8 January 2016)

P. H. Buxton
23/10/2015

CEFN CRIBWR Learning Resource Centre

SEPTEMBER 2015

| | |
|---|---|
| 4 | 6 |
| | 6 |
| | 6 |
| | 6 |
| 2 | 5 |
| | 5 |
| 2 | 4 |
| | 4 |
| 1 | 3 |

9 places taken and 6 surplus places available 2015/16.

4 pupils will be leaving in July 2016.

5 pupils have been offered places for September 2016

SEPTEMBER 2016

| | |
|---|---|
| 2 | 6 |
| | 6 |
| 2 | 5 |
| | 5 |
| 1 | 4 |
| 5 | 3 |
| | 3 |
| | 3 |
| | 3 |
| | 3 |

10 places taken and 5 surplus places available 2016/17.

2 pupils will be leaving in July 2017.

There are an unknown number of pupils entering September 2017.

SEPTEMBER 2017

| | |
|------------|---|
| 2 | 6 |
| | 6 |
| 1 | 5 |
| 5 | 4 |
| | 4 |
| | 4 |
| | 4 |
| | 4 |
| Unknown Y3 | |

8 known places taken and 7 known available places for 2017/18

2 pupils will be leaving in July 2018.

There are an unknown number of pupils entering September 2018.

SEPTEMBER 2018

| | |
|------------|---|
| 1 | 6 |
| 5 | 5 |
| | 5 |
| | 5 |
| | 5 |
| | 5 |
| Unknown Y4 | |
| Unknown Y3 | |

6 known places taken and 9 known available places for 2018/19

1 pupil will be leaving in July 2019.

There are an unknown number of pupils entering September 2019.

SEPTEMBER 2019

| | |
|------------|---|
| 5 | 6 |
| | 6 |
| | 6 |
| | 6 |
| | 6 |
| Unknown Y5 | |
| Unknown Y4 | |
| Unknown Y3 | |

5 known places taken and 10 known available places for 2019/20

5 pupils will be leaving in July 2020.

There are an unknown number of pupils entering September 2020.

SEPTEMBER 2020

| |
|------------|
| Unknown Y6 |
| Unknown Y5 |
| Unknown Y4 |
| Unknown Y3 |

CORNELI Learning Resource Centre

SEPTEMBER 2015

| | |
|---|---|
| 8 | 6 |
| | 6 |
| | 6 |
| | 6 |
| | 6 |
| | 6 |
| | 6 |
| | 6 |
| 3 | 5 |
| | 5 |
| | 5 |
| 1 | 4 |
| 3 | 3 |
| | 3 |
| | 3 |

15 places taken and 0 surplus places available 2015/16.

8 pupils will be leaving in July 2016.

1 pupil has been offered a place for September 2016

SEPTEMBER 2016

| | |
|---|---|
| 3 | 6 |
| | 6 |
| | 6 |
| 1 | 5 |
| 3 | 4 |
| | 4 |
| | 4 |
| 1 | 3 |

8 places taken and 7 surplus places available 2016/17.

3 pupils will be leaving in July 2017.

There are an unknown number of pupils entering September 2017.

SEPTEMBER 2017

| | |
|------------|---|
| 1 | 6 |
| 3 | 5 |
| | 5 |
| | 5 |
| 1 | 4 |
| Unknown Y3 | |

5 known places taken and 10 known place available for 2017/18

1 pupil will be leaving in July 2018.

There are an unknown number of pupils entering September 2018.

SEPTEMBER 2018

| | |
|------------|---|
| 3 | 6 |
| | 6 |
| | 6 |
| 1 | 5 |
| Unknown Y4 | |
| Unknown Y3 | |

4 known places taken and 11 known places available for 2018/19

3 pupils will be leaving in July 2019.

There are an unknown number of pupils entering September 2019.

SEPTEMBER 2019

| | |
|------------|---|
| 1 | 6 |
| Unknown Y5 | |
| Unknown Y4 | |
| Unknown Y3 | |

1 known place taken and 14 known places available for 2019/20

1 pupil will be leaving in July 2020.

There are an unknown number of pupils entering September 2020.

SEPTEMBER 2020

| | |
|------------|--|
| Unknown Y6 | |
| Unknown Y5 | |
| Unknown Y4 | |
| Unknown Y3 | |

There are the following admissions into the three Moderate Learning Difficulties Learning Resource Centres between 2010 and 2016:

Cefn Cribwr

2016: 5 pupil

2015: 1 pupil

2014: 2 Pupils

2013: 2 pupils

2012: 4 pupils

2011: 1 pupil

2010: 4 pupils

Corneli

2016: 1 pupil

2015: 3 pupils

2014: 1 Pupil

2013: 3 pupils

2012: 8 pupils

2011: 5 pupils

2010: 0 pupils

Pil

2016: 0 pupils

2015: 0 pupils

2014: 0 Pupil

2013: 0 pupils

2012: 1 pupils

2011: 2 pupils

2010: 2 pupils

Total: 19 pupils

Total: 21 pupils

Total: 5 pupils

Grand Total: 45 pupils over 7 years.

- On average 6.5 pupils per year between the three schools.
- (One pupil in Pil moved to Corneli so those figures have been considered in Corneli)

If Pil were to close these numbers would be distributed between two schools.

Predictions

Consider 3 pupils per year in Cefn Cribwr; predictions would be:

2017: 11

2018: 12

2019: 14

2020: 12

Consider 3.5 pupils per year (3 and 4 pupils on alternate years) in Corneli; predictions would be:

2017: 9 (+4 pupils)

2018: 11 (+3 pupils)

2019: 12 (+4 pupils)

2020: 14 (+3 pupils)

Based on these predictions there should be enough capacity in Cefn and Corneli LRCs should Pil close.

Travelling distances

- Cefn Cribwr Primary is 1.9 miles from Corneli Primary – a 5 minute journey by car.
- Pil Primary is 0.9 miles from Corneli Primary – a 4 minute journey by car.

APPENDIX (ix)

Full Equality Impact Assessment

| | |
|---|--|
| Name of project, policy, function, service or proposal being assessed: | Proposal to change the provision for pupils with additional learning needs (ALN) at Pil Primary School |
| Date assessment completed | 26 April 2016 |

At this stage you will need to re-visit your initial screening template to inform your discussions on consultation and refer to [guidance notes on completing a full EIA](#)

An Initial Equality Impact Assessment Screening was undertaken on this proposal on 20th January 2016. The recommendation from the EIA Screening was that a Full Equality Impact Assessment would be required.

The consultation is to invite your views on the proposal to close the moderate learning difficulties learning resource class for 15 pupils with Moderate Learning Difficulties at Pil Primary School.

A consultation exercise lasting from 16 March until 28th April sought the views of staff, parents, pupils, interested parties and the governing body as the first step in the statutory process. If the proposals are supported they would come into effect on 1 September 2016.

1. Consultation

| | | Action Points |
|---|--|--|
| Who do you need to consult with (which equality groups)? | Within each of the protected characteristic groups the council will need to consult with: Head Teacher, Teachers, Governing Body, Parents, carers and guardians of children and the general public. | The consultation tools and mechanisms to be used should include: Focused Meetings, Public Meetings, a consultation document and associated questionnaire, publication of all information on the council's website and school websites, press releases, information on the council's customer service screens, all partners, social media, Bridge members, schools texting service, Local Service Board, citizens panel |
| How will you ensure your consultation | The council is mindful that as wide a | |

| | | |
|--|--|--|
| <p>is inclusive?</p> | <p>range of consultation and engagement activities and tools need to be deployed in order to reach as wide an audience of consultees as possible. Consultation and engagement must be maximised in order that public views and concerns are “heard and considered” by the council to identify better ways of working and influence difficult decision making from a representative group.</p> <p>Methods of consultation will include (where appropriate) bilingual (Welsh / English) materials, information produced in languages other than English and Welsh, large print documents, easy read versions of information, provision of audio information and will include a mix of hard copy documents and provision of online forms and information. The council recognises that, key to the council’s consultation and engagement strategy is the commitment to visiting the public and other consultees in their own locations / communities at times that are convenient to them. Another key element is liaising with pupils of the school through engagement with the school council.</p> | |
| <p>What consultation was carried out? Consider any consultation activity already carried out, which may not have been specifically about equality</p> | <p>Interested / impacted parties were invited to consider the proposal and submit views as to whether or not they supported the proposal to close one moderate learning</p> | |

| | | |
|---|--|--|
| but may have information you can use | difficulties class at Pil Primary School with effect from 1 September 2016 via consultation meetings held for the different interested parties. Interested and impacted parties were invited to attend meetings to hear an explanation of the proposal, put questions and express any views or concerns. | |
|---|--|--|

Record of consultation with people from equality groups

| Group or persons consulted | Date, venue and number of people | Feedback, areas of concern raised | Action Points |
|---|---|---|---|
| Members of School Council of Pil Primary School | 22 nd March 2016. Further details are included in this EIA | Feedback documents were circulated to all attendees at the event for individual considered views to be shared with the council | Please see tables within this Full EIA. |
| Pil Primary school staff (1 meeting) | 22 nd March 2016. Further details are included in this EIA | Feedback documents were circulated to all attendees at the event for individual considered views to be shared with the council. | Please see tables within this Full EIA. |
| Governing Body of Pil Primary School | 22 nd March 2016. Further details are included in this EIA | Feedback documents were circulated to all attendees at the event for individual considered views to be shared with the council. | Please see tables within this Full EIA. |
| Parents of pupils at Pil Primary School | 22 nd March 2016. Further details are included in this EIA | Feedback documents were circulated to all attendees at the event for individual considered views to be shared with the council. | Please see tables within this Full EIA. |

2. Assessment of Impact

Based on the data you have analysed, and the results of consultation or research, consider what the potential impact will be upon people with protected characteristics (negative or positive). If you do identify any adverse impact you **must**:

a) Liaise with the Engagement Team who may seek legal advice as to whether, based on the evidence provided, an adverse impact is or is potentially discriminatory, and

b) Identify steps to mitigate any adverse impact – these actions will need to be included in your action plan.

Include any examples of how the policy helps to promote equality.

The attached Cabinet Report provides a summary of Consultation responses, data and feedback.

| Gender | Impact or potential impact | Actions to mitigate |
|---|---|--|
| Identify the impact/potential impact on women and men. | None | Neither men nor women will be disproportionately negatively affected by this proposal. |
| Disability | Impact or potential impact | Actions to mitigate |
| Identify the impact/potential impact on disabled people (ensure consideration of a range of impairments, e.g. physical, sensory impairments, learning disabilities, long-term illness). | Disabled children could be negatively impacted by the proposal. | Additional Learning Needs Education (ALN) services will be protected, however will be delivered differently. There is an informed expectation that ALN pupils currently at Pil Primary school will continue to receive ALN services and will maximise their potential. |
| Race | Impact or potential impact | Actions to mitigate |
| Identify the impact/potential impact of the service on Black and minority ethnic (BME) people. | Black and minority ethnic people will not be disproportionately negatively affected by this proposal. | None |
| Religion and belief | Impact or potential impact | Actions to mitigate |
| Identify the impact/potential impact of the | There will be no impact on Religion and | None |

| | | |
|--|---|----------------------------|
| service on people of different religious and faith groups. | Belief as a result of this proposal if it is approved. | |
| Sexual Orientation | Impact or potential impact | Actions to mitigate |
| Identify the impact/potential impact of the service on gay, lesbian and bisexual people. | There will be no impact on Sexual orientation as a result of this proposal if it is approved. | None |
| Age | Impact or potential impact | Actions to mitigate |
| Identify the impact/potential impact of the service on older people and younger people. | There will be no impact on Age as a result of this proposal if it is approved. | None |
| Pregnancy & Maternity | Impact or potential impact | Actions to mitigate |
| | There will be no impact on Pregnancy and Maternity as a result of this proposal if it is approved. | None |
| Transgender | Impact or potential impact | Actions to mitigate |
| | There will be no impact on Transgender people as a result of this proposal if it is approved. | None |
| Marriage and Civil Partnership | Impact or potential impact | Actions to mitigate |
| | There will be no impact on Marriage and Civil Partnership as a result of this proposal if it is approved. | None |

United Nations Convention on the Rights of the Child (UNCRC)

The UNCRC is an agreement between countries which sets out the basic rights all children should have. The United Kingdom signed the agreement in 1991. The UNCRC includes 42 rights given to all children and young people under the age of 18. The 4 principles are:

1. Non-discrimination
2. Survival and development
3. Best interests
4. Participation

This section of the Full EIA contains a summary of all 42 articles and some will be more relevant than others, depending on the policy being considered however, there is no expectation that the entire convention and its relevance to the policy under review is fully understood. The Engagement Team will review the relevant data included as part of its monitoring process. The EIA process already addresses two of the principle articles which are non-discrimination and participation. This section covers “Best interests” and “Survival and development”.

Some policies will have **no direct impact** on children such as a day centre for older people.

Some policies will **have a direct impact** on children where the policy refers to a childrens’ service such as a new playground or a school.

Some policies will **have an indirect impact** on children such as the closure of a library or a cultural venue, major road / infrastructure projects, a new building for community use or change of use and most planning decisions outside individual home applications.

What do we mean by “best interests”?

The “Best interest” principle does not mean that any negative decision would automatically be overridden but it does require BCBC to examine how a decision has been justified and how the Council would mitigate against the impact (in the same way as any other protected group such as disabled people).

- The living wage initiative could be considered to be in the “Best interests”. The initiative could potentially lift families out of poverty. Poverty can seriously limit the life chances of children.
- The closure of a library or cultural building would not be in the “Best interests” of children as it could limit their access to play, culture and heritage (Article 31.)

Please detail below the assessment / judgement of the impact of this policy on children aged 0 – 18. Where there is an impact on “Best interests” and “Survival and development”, please outline mitigation and any further steps to be considered. The 42 rights are detailed below.

Article 1: Everyone under 18 years of age has all the rights in this Convention.

Article 20: Children who cannot be looked after by their own family must be looked after properly, by people who respect their religion, culture and language

Article 21: When children are adopted the first concern must be what is best for them.

Article 22: Children who come into a country as refugees should have the same rights as children born in that country.

Article 23: Children who have any kind of disability should have special care and support so that they can lead full and independent lives.

Article 24: Children have the right to good quality health care and to clean water, nutritious food and a clean environment so that they will stay healthy.

Article 25: Children who are looked after by their local authority rather than their parents should have their situation reviewed regularly.

Article 26: We should provide extra money for the children of families in need.

Article 27: Children have a right to a standard of living that meets their physical and mental needs. We should help families who cannot afford this.

Article 28: Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29: Education should develop each child's personality and talents to the full.

Article 30: Children have a right to learn and use the language and customs of their families.

Article 31: All children have a right to relax and play, and to join in a wide range of activities.

Article 32: We should protect children from work that is dangerous or might harm their health or their education.

Article 33: We should provide ways of protecting children from dangerous drugs.

Article 34: We should protect children from sexual abuse.

Article 35: We should make sure that children are not abducted or sold.

Article 36: Children should be protected from any activities that could harm their development.

Article 37: Children who break the law should not be treated cruelly.

Article 38: Governments should not allow children under 15 to join the army.

Article 39: Children who have been neglected or abused should receive special help to restore their self - respect.

Article 40: Children who are accused of breaking the law should receive legal help. Prison sentences should only be used for the most serious offences.

Article 41: If the laws of a particular country protect children better than the articles of the Convention, then those laws should stay.

Article 42: We should make the Convention known to all parents and children.

| Impact or potential impact on children aged 0 - 18 | Actions to mitigate |
|--|---------------------|
| | |

In terms of this policy, the relevant articles to be considered are articles 3, 12, 28 and 30.

Article 3: The council works towards what is best for each child. There is no impact of this policy on article 3.

Article 12: Children have been given the opportunity to say what they think as they have been included in the consultation and engagement programme. Their views and opinions have been taken into account. There is, therefore, no impact on article 12.

Article 28: Children in Bridgend County Borough Council have a right to an education. The methods of discipline in our schools respect childrens' human rights and dignity. There is, therefore, no impact on article 28.

Article 30: Children in Bridgend are supported and encouraged to learn and use the language and customs of their families. There is, therefore, no impact on article 30.

The Corporate Improvement Plan. The proposals relate, in particular, to principle two and three. The Education Inclusion Strategy was agreed by the council's Cabinet in March 2009.

The council is mindful that a further period of time is required to enable a full and meaningful assessment of the impact of this proposal to be made. The council will need to address a number of questions:

- the impact of the closure on the outcomes of the pupils directly affected by the closure,
- a clearer understanding (based on further evaluation and assessment) of the realignment of the council's provision for pupils with additional learning needs.

The council has already carried out an Initial Screening Equality Impact Assessment and this identified a number of potential risks which have been addressed in this Full Equality Impact Assessment. These risks include the impact of the closure on future service need and the possible impact of increased class sizes. It recognises appropriately that a full assessment of the impact on attainment levels needs to be included together with more information on ages and levels of disability of the pupils in receipt of the service.

This Full Equality Impact Assessment is considered to be a live document and its fluidity will be reflected in the ongoing assessment of the impact on Children with Additional Learning Needs of the policy.

The full EIA holistically evaluates the pupils affected by the introduction of the proposal.

Please outline how and when this EIA will be monitored in future and when a review will take place:

3. Action Plan

| Action | Lead Person | Target for completion | Resources needed | Service Development plan for this action |
|---|--|---|------------------|--|
| Continue to review and monitor MLD places available | Group Manager Inclusion. Lead Educational Psychologist. Team Manager ALN | Reviewed annually. | Staff time. | Yes. |
| Continue to track and monitor individual pupil progress within the MLD learning resource centres. | Group Manager Inclusion. Team Manager ALN. Cognition and Learning Specialist Teachers. | Termly data tracking. Annual review. | Staff time. | Yes. |
| Provide relevant training for the MLD in the primary schools in order to build capacity | Team Manager ALN. Cognition and Learning Teachers | Ongoing from September 2016 | Staff time. | Yes. |

Please outline the name of the independent person (someone other the person undertaking the EIA) countersigning this EIA below:

Paul Williams, Equality and Engagement Officer.

Signed:- Michelle Hatcher

Date: 26th April 2016.

4. Publication of your results and feedback to consultation groups

It is important that the results of this impact assessment are published in a user friendly accessible format.

It is also important that you feedback to your consultation groups with the actions that you are taking to address their concerns and to mitigate against any potential adverse impact.

Please send completed EIA form to [Paul Williams, Equalities and Engagement Officer](#)