

Caerphilly County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles
Well-being of Future Generations (Wales) Act 2015
Welsh Language (Wales) Measure 2011

PLEASE NOTE: Section 3 Socio-economic Duty only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

PLEASE NOTE: Overwrite any grey text, it is there to guide you. Make sure the font colour is converted to black for accessibility reasons.

1. Proposal Details

Lead Officer	Head of Service	Service Area & Department	Date
Andrea West / Lisa Thomas	Sue Richards	Place Shaping and Sustainable Communities for Learning	April 2024

What is the proposal to be assessed? *Provide brief details of the proposal and provide a link to any relevant report or documents.*

Due to the falling rolls and significant projected deficit budget at Rhydri Primary school, several meetings were arranged by the Head Teacher and the Governing body with Local Authority representatives including the Chief Education Officer, to discuss the future viability of the school. At the conclusion of these meetings in March 2024, the Governing Body advised that the school could no longer maintain a balanced budget and an appropriate staffing level, therefore requested the Local Authority start the consultation process to pursue the proposed closure of Rhydri Primary School with effect from July 2025.

The proposal relates to the closure of Rhydri Primary School with effect from July 2025, following a request to consult from the Governing Body of the School made at their meeting of the 14th March 2024.

For this proposal, our consultation process must follow the Welsh Government Statutory guidance as set out in the School Organisation Code 2018.

Background Information

Rhydri Primary School provides education to pupils between the ages of 3 and 11 and has a capacity figure of 91 places with a published admission number of 13.

In February 2014 the school was encouraged to work collaboratively with Bedwas Junior School to move out of special measures and support its financial outlook. As a result of this being successfully implemented, the school saw an initial increase in pupil numbers and a move out of special measures, the formal Federation of the Governing Bodies of Rhydri Primary School and Bedwas Junior School was established in September 2019.

However, the Head Teacher and Governing Body acknowledged that Rhydri Primary School faced a significant financial deficit with pupil numbers projected to decrease moving forward and approached the Local Authority to work together to look at all potential solutions and various financial models to explore the potential scenarios for recovery.

Under the School Funding (Wales) Regulations 2010, individual school budgets are determined using a locally agreed funding formula in accordance with factors which are property and learner led. Schools must be able to demonstrate via a financial action plan that the school will work to deliver a balanced budget.

In Summer of 2023, the advice was to reduce from 3 classes to 2 classes in order to maximise the time available to the school to recover its financial position. This advice was based on successful precedents in other local authorities and working closely with the Education Achievement Service. At this point, the Governing Body voted in favour of this proposal, as did the staff affected. The emphasis was on prolonging the viability of the school and minimising the impact on children and the education delivered.

However, due to concerns raised by parents, the decision was reversed by the Governing Body resulting in retaining 3 classes at the school and pursuit of additional pupils through a proactive marketing campaign designed to drive up pupil numbers.

The Local Authority made it clear to Governors when considering this alternative position, that should pupil numbers not significantly increase by the Spring of 2024 the school may have no option but to move to closure. The Governing Body ultimately chose to vote in favour of the parental desire to retain 3 classes and against the advice of the Local Authority, in spite of the accelerated risk to the future viability of the school.

Whilst there was an initial increase in pupil numbers noted, during this time, the costs of continuing with 3 classrooms have continued to increase the deficit facing the school. At the end of the 2023/2024 financial year the school reported on a deficit budget of £22,000, and despite cutting back in all areas working closely with the Local Authority, the school have submitted their 2024/2025 figures of a deficit budget of £175,000. When a school reports a deficit budget, they must produce a 3 year action plan that will return the budget to a surplus position. Whilst there is an option to explore this over a 5 year period with permission from the Local Authority's Section 151 Officer, even over a 5 year period, a surplus position remains unachievable for the school.

At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school. Based on the anticipated numbers for September 2024, surplus places will be at 62% and projected to increase in future years as the number of pupils predicted to attend the school is anticipated to decline linked to a reduction in live birth rates in the area and parental preference. All reasonable alternatives to closure have been explored, and all avenues presented by the Governing Body explored including the viability of a Church of Wales School option. However, the projected pupil numbers and resultant deficit financial outlook for the school provides a significant challenge to the Head and School Governors to agree a balanced budget to maintain the school and an appropriate staffing level, which has led to a request from the Governing Body at its meeting of the 14th March 2024 to the local authority to consider closing the school from July 2025 and undertake the required Statutory Consultation.

Extract of Letter released by Rhydri Primary School (15.3.24)

“Our Governing Body met yesterday evening (Thursday 14 March) to discuss further the future of Rhydri Primary and it is with sadness, that I need to inform you that they took the difficult decision to commence a formal process to seek the closure of the school from September 2025.”

“I appreciate this is a disappointing outcome for the whole school community, but you will be aware that over recent years we have seen fewer and fewer children attending Rhydri Primary. Sadly, the number of children forecast to attend in future is also very low, coupled with low birth rate and increased costs means that we find ourselves in a very difficult position.”

“This financial outlook is such a cause of concern that Governors have no choice but to seek the closure of Rhydri Primary at the end of the next academic year (July 2025).”

2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Age (people of all ages)	Negative Rhydri Primary School provides education to pupils between the ages of 3 and 11. Closure of the school will	In order to ensure there is no change to the catchment area for Secondary provision, it is proposed that the catchment	<ul style="list-style-type: none"> • Actual Pupil Numbers • Office of National Statistics census data

	<p>result in these pupils having to attend alternative educational provision.</p> <p>Neutral The St James Primary School school site is 2.2 miles from the current Rhydri Primary School site, which may result in additional travel for pupils dependent on their home address. At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school.</p>	<p>area remains within that for St Martins secondary school.</p> <p>To enable this, the nearest primary school with availability to accommodate all pupils from Rhydri Primary School across all age groups, and within the St Martins secondary school catchment is St.James Primary School. Therefore, should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>Transport will be provided in line with the Council's Transport Policy.</p>	<ul style="list-style-type: none"> • Local Health Board – Live Birth Data • Equality Act 2010 • Strategic Equality Plan 2020-2024 • Equal Wales 2020-2024 Easy read • Caerphilly - Censusward profiles • Pupil Level Annual School Census (PLASC)
<p>Disability (<i>people with disabilities/ long term conditions</i>)</p>	<p>Positive St James Primary features a Special Resource Base to accommodate pupils with Additional Learning Needs.</p> <p>Positive Built circa 1900 and situated in Rhydri, the school occupies a total area of approximately 0.1 Hectares, and accommodates 1 main structure, 2 demountables, Staff Room and Intervention space, with limited outside space utilised for curriculum activities.</p>	<p>Not applicable</p> <p>Transport will be provided in line with the Council's Transport Policy.</p>	<ul style="list-style-type: none"> • EOTAS Strategy - CCBC • Condition Surveys

	The school has a condition rating of C, a Suitability grading of D and a Display Energy Certificate category of G. In comparison, St James Primary School, which was replaced with a new building in 2011, has a condition rating of C+ and a suitability grading of A with a Display Energy Certificate of C.		
Gender Reassignment (<i>anybody who's gender identity or gender expression is different to the sex they were assigned at birth</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable
Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable
Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable
Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community	Not applicable

		regardless of other specific protected characteristics.	
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable
Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual, other</i>)	Neutral No anticipated change	Not applicable because alternative school facilities are available within the borough and accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable

3. Socio-economic Duty (Strategic Decisions Only)

(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

Armed Forces Community

Carers

Homeless people

Looked after children

Pensioners
 People of all ages leaving a care setting
 People involved in the criminal justice system
 People living in the most deprived areas in Wales (WIMD)
 People misusing substances
 People who have experienced the asylum system
 People with low literacy/numeracy Single parents and vulnerable families
 Single adult households
 Students

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p>Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Closure of the school will result in these pupils having to attend alternative educational provision.</p> <p>Should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>St James Primary school site is 2.2 miles from the current Rhydri Primary School site, which may result in additional travel for pupils dependent on their home address.</p> <p>Subject to the proposal gaining approval and the closure of Rhydri Primary School, the existing school building and site would then be classified as surplus to educational requirement and become an unallocated Corporate Asset. Future use of the building and site would</p>	<p>In order to ensure there is no change to the catchment area for Secondary provision, it is proposed that the catchment area remains within that for St Martins secondary school.</p> <p>To enable this, the nearest primary school with availability to accommodate all pupils from Rhydri Primary School across all age groups, and within the St Martins secondary school catchment is St.James Primary School. Therefore, should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>Transport will be provided in line with the Council's Transport Policy.</p>	<p>Rhydri Primary School is located within the Caerphilly Basin area and is a feeder school for St Martin's secondary school.</p> <p>Neighbouring Schools Data</p> <p>Distance from Rhydri Primary School St James Primary = 2.2 miles</p> <ul style="list-style-type: none"> • Equality Act 2010 • Wales Act 2017 - Public sector duty regarding socio-economic inequalities • Equality Act 2010 - Public sector duty regarding socio-economic inequalities

	then be subject to a stringent series of tests to ensure Welsh Language and Local Community Use are prioritised. Any current community groups would be encouraged to relocate and will be engaged with as part of the consultation process.		<ul style="list-style-type: none"> • Is Wales Fairer? – The state of equality and human rights • Welsh Index of Multiple Deprivation (gov.wales)
Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)	<p>Should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>St James Primary school site is 2.2 miles from the current Rhydri Primary School site, which may result in additional travel for pupils dependent on their home address.</p> <p>Any current community groups would be encouraged to relocate and will be engaged with as part of the consultation process.</p>	<p>At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school.</p> <p>Transport will be provided in line with the Council’s Transport Policy.</p>	<p>Neighbouring Schools Data</p> <p>Distance from Rhydri Primary School St James Primary = 2.2 miles</p> <ul style="list-style-type: none"> • Equality Act 2010 • Wales Act 2017 - Public sector duty regarding socio-economic inequalities • Equality Act 2010 - Public sector duty regarding socio-economic inequalities • Is Wales Fairer? – The state of equality and human rights • Welsh Index of Multiple Deprivation (gov.wales)
Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)	Not applicable because all schools are accessible to pupils and the wider community regardless of other specific protected characteristics.	Not applicable	Not applicable

<p>Area Deprivation (<i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i>)</p>	<p>Closure of the school will result in these pupils having to attend alternative educational provision.</p> <p>Should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p>	<p>At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school.</p> <p>Transport will be provided in line with the Council's Transport Policy.</p>	<ul style="list-style-type: none"> • Welsh Index of Multiple Deprivation (gov.wales) • 2021 Census • 2011 Census
<p>Socio-economic Background (<i>social class i.e. parents education, employment and income</i>)</p>	<p>Not applicable because all schools are accessible to pupils and the wider community regardless of other specific protected characteristics.</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Socio-economic Disadvantage (<i>What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged</i>)</p>	<p>Not applicable because all schools are accessible to pupils and the wider community regardless of other specific protected characteristics.</p> <p>St James Primary features a Special Resource Base to accommodate pupils with Additional Learning Needs.</p>	<p>Not applicable</p>	<p>Not applicable</p>

4. Corporate Plan – Council's Well-being Objectives

(How does your proposal deliver against any/all of the Council's Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) [Corporate Plan](#)

<p>Objective 1 - Enabling our Children to Succeed in Education</p>	<p>As per the request to the Local Authority and the letter released by the Head and Governing Body of Rhydri Primary School; The proposal would address the concerns relating to declining numbers and remove financial pressures relating to delivery of a balanced budget. Whilst this would result in the closure of the</p>
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	<p>school, pupil education and welfare remain the utmost priority for all parties involved in bringing this proposal.</p> <p>Should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>The proposed changes would be planned carefully to minimise any negative impact.</p>
<p>Objective 2 - Enabling our Residents to Thrive</p>	<p>Any current community groups would be encouraged to relocate and will be engaged with as part of the consultation process.</p>
<p>Objective 3 - Enabling our Communities to Thrive</p>	<p>Rhydri Primary School provides education to pupils between the ages of 3 and 11. Closure of the school will result in these pupils having to attend alternative educational provision.</p> <p>Should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>The proposed changes would be planned carefully to minimise any negative impact.</p> <p>Subject to the proposal gaining approval and the closure of Rhydri Primary School, the existing school building and site would then be classified as surplus to educational requirement and become an unallocated Corporate Asset. Future use of the building and site would then be subject to a stringent series of tests to ensure Welsh Language and Local Community Use are prioritised. Any current community groups would be encouraged to relocate and will be engaged with as part of the consultation process.</p>
<p>Objective 4 - Enabling our Economy to Grow</p>	<p>Not applicable as the proposal is linked to an existing school</p>
<p>Objective 5 - Enabling our Environment to be Greener</p>	<p>There is a Statutory duty placed upon the Authority to provide pupils with free transport to their nearest suitable school if they reside beyond 'walking distance' to that school. All pupils are assessed in accordance with the Learner Travel (Wales) Measure 2008.</p>

	<p>Built circa 1900 and situated in Rhydri, the school occupies a total area of approximately 0.1 Hectares, and accommodates 1 main structure, 2 demountables, Staff Room and Intervention space, with limited outside space utilised for curriculum activities. The school has a condition rating of C, a Suitability grading of D and a Display Energy Certificate category of G. In comparison, St James Primary School, which was replaced with a new building in 2011, has a condition rating of C+ and a suitability grading of A with a Display Energy Certificate of C.</p>
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<p>Links to any other relevant Council Policy <i>(How does your proposal deliver against any other relevant Council Policy?)</i></p>
<p>Caerphilly Local Authority Education Strategy (2022 – 2025) ‘Pursuing Excellence Together’ This proposal will deliver upon the Council’s ambition to provide every learner with the best life chances through the provision of high quality teaching, learning and leadership across our impressive 21st Century school settings.</p> <p>Due to the falling rolls and significant projected deficit budget at Rhydri Primary school, several meetings were arranged by the Head Teacher and the Governing body with Local Authority representatives including the Chief Education Officer, to discuss the future viability of the school. At the conclusion of these meetings in March 2024, the Governing Body advised that the school could no longer maintain a balanced budget and an appropriate staffing level, therefore requested the Local Authority start the consultation process to pursue the proposed closure of Rhydri Primary School with effect from July 2025.</p>

5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
Long Term	<p>The Council must act in a manner that seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.</p> <p>This proposal has been brought forward at the request of the Head and Governing Body of Rhydri Primary School having acknowledged concerns relating to falling pupil numbers and delivering a balanced budget.</p>

<p>Prevention</p>	<p>All reasonable alternatives to closure have been explored:</p> <ul style="list-style-type: none"> • Collaboration with Bedwas Junior School (implemented in February 2014) • Federation with Bedwas Junior School (implemented in September 2019) • Recommendation from LA relating to Class Reduction from 3 to 2 (not taken up) • Parental marketing campaign • The agreed timeline for the Governing Body to produce a balanced budget was extended from 3 to 5 years as agreed by the Authority's Section 151 Officer. <p>In addition, all avenues presented by the Governing Body and raised at Cabinet on the 24th July 2024 have been explored including the viability of a Church of Wales School option, the option to extend to 5-year financial recovery plan, by permission of Section 151 Officer and consideration of ALN provision.</p>
<p>Integration</p>	<ul style="list-style-type: none"> • Collaboration with Bedwas Junior School (implemented in February 2014) • Federation with Bedwas Junior School (implemented in September 2019)
<p>Collaboration</p>	<p>In February 2014 the school was encouraged to work collaboratively with Bedwas Junior School to move out of special measures and support its financial outlook. As a result of this being successfully implemented, the school saw an initial increase in pupil numbers and a move out of special measures, the formal Federation of the Governing Bodies of Rhydri Primary School and Bedwas Junior School was established in September 2019.</p> <p>However, the Head Teacher and Governing Body acknowledged that Rhydri Primary School faced a significant financial deficit with pupil numbers projected to decrease moving forward and approached the Local Authority to work together to look at all potential solutions and various financial models to explore the potential scenarios for recovery.</p> <p>Under the School Funding (Wales) Regulations 2010, individual school budgets are determined using a locally agreed funding formula in accordance with factors which are property and learner led. Schools must be able to demonstrate via a financial action plan that the school will work to deliver a balanced budget.</p> <p>In Summer of 2023, the advice was to reduce from 3 classes to 2 classes in order to maximise the time available to the school to recover its financial position. This advice was based on successful precedents in other local authorities and working closely with the Education Achievement Service. At this point, the Governing Body voted in favour of this proposal. The emphasis was on prolonging the viability of the school and minimising the impact on children and the education delivered.</p> <p>However, due to concerns raised by parents, the decision was reversed by the Governing Body resulting in retaining 3 classes at the school and pursuit of additional pupils through a proactive marketing campaign designed to drive up pupil numbers</p>

	<p>The Local Authority made it clear to Governors when considering this alternative position, that should pupil numbers not significantly increase by the Spring of 2024 the school may have no option but to move to closure. The Governing Body ultimately chose to vote in favour of the parental desire to retain 3 classes and against the advice of the Local Authority, in spite of the accelerated risk to the future viability of the school.</p> <p>Whilst there was an initial increase in pupil numbers noted, during this time, the costs of continuing with 3 classrooms have continued to increase the deficit facing the school. At the end of the 2023/2024 financial year the school reported on a deficit budget of £22,000, and despite cutting back in all areas working closely with the Local Authority, the school have submitted their 2024/2025 figures of a deficit budget of £175,000. When a school reports a deficit budget, they must produce a 3 year action plan that will return the budget to a surplus position. Whilst there is an option to explore this over a 5 year period with permission from the Local Authority's Section 151 Officer, even over a 5 year period, a surplus position remains unachievable for the school.</p> <p>At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school. Based on the anticipated numbers for September 2024, surplus places will be at 62% and projected to increase in future years as the number of pupils predicted to attend the school is anticipated to decline linked to a reduction in live birth rates in the area and parental preference.</p> <p>All reasonable alternatives to closure have been explored, and all avenues presented by the Governing Body explored including the viability of a Church of Wales School option. However, the projected pupil numbers and resultant deficit financial outlook for the school provides a significant challenge to the Head and School Governors to agree a balanced budget to maintain the school and an appropriate staffing level, which has led to a request from the Governing Body at its meeting of the 14th March 2024 to the local authority to consider closing the school from July 2025 and undertake the required Statutory Consultation.</p>
<p>Involvement</p>	<p>Due to the falling rolls and significant projected deficit budget at Rhydri Primary school, several meetings were arranged by the Head Teacher and the Governing body with Local Authority representatives including the Chief Education Officer, to discuss the future viability of the school. At the conclusion of these meetings in March 2024, the Governing Body advised that the school could no longer maintain a balanced budget and an appropriate staffing level, therefore requested the Local Authority start the consultation process to pursue the proposed closure of Rhydri Primary School with effect from July 2025.</p> <p>The proposed changes would be planned carefully to minimise any negative impact. Subject to approval, the Governing Body of Rhydri Primary School will be disbanded at the time of closure.</p>

	<p>Rhydri Primary School is currently federated with Bedwas Junior School and the federation has been established since February 2019 after a successful period of collaboration. Subject to approval to close, the federation will automatically dissolve, and the authority will work with the Governing Body of Bedwas Junior School to ensure that any statutory processes and support are followed.</p>
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6. Well-being of Future Generations (Wales) Act 2015

Well-being Goals	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Prosperous Wales <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>The proposal relates to the closure of Rhydri Primary School with effect from July 2025, following a request to consult from the Governing Body of the School made at their meeting of the 14th March 2024.</p> <p>The proposed changes would be planned carefully to minimise any negative impact.</p> <p>Based on current pupil numbers, the large percentage of pupils attending Rhydri Primary School who reside outside of its catchment; therefore it is envisaged that there will be minimal impact on any of the neighbouring schools.</p> <p>The proposed new catchment of St James Primary School has sufficient capacity to accommodate all pupils who are currently attending Rhydri Primary School, subject to parental preference and all Year 6 pupils will naturally progress to a Secondary provision subject to parental preference.</p>
<p>A Resilient Wales <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>The proposal relates to the closure of Rhydri Primary School with effect from July 2025, following a request to consult from the Governing Body of the School made at their meeting of the 14th March 2024.</p> <p>Rhydri Primary School is located within the Caerphilly Basin area and is a feeder school for St Martin’s secondary school.</p>

	<p>In order to ensure there is no change to the catchment area for Secondary provision, it is proposed that the catchment area remains within that for St Martins secondary school.</p> <p>To enable this, the nearest primary school with availability to accommodate all pupils from Rhydri Primary School across all age groups, and within the St Martins secondary school catchment is St.James Primary School. Therefore, should this proposal be agreed by Cabinet, all pupils will be able to transition to St. James Primary School subject to parental preference.</p> <p>Transport will be provided in line with the Council’s Transport Policy.</p>
<p>A Healthier Wales <i>A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>The Council must act in a manner that seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.</p> <p>This proposal has been brought forward at the request of the Head and Governing Body of Rhydri Primary School having acknowledged concerns relating to falling pupil numbers and delivering a balanced budget.</p>
<p>A More Equal Wales <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>Pupils that are currently in Year 6 will receive the usual transition opportunities to prepare for the next stage of education in St Martin’s Secondary School or elsewhere. This will include opportunities, prior to the start of the new academic year, for pupils to engage in pre-planned relationship-building activities with peers across the St Martin’s cluster. Discussions will also take place between schools to promote continuity of learning and ensure that individual needs will be met in the new setting. Regular meetings between the Local Authority and the school will monitor the induction and progress of this group of pupils.</p> <p>Similarly, robust transition arrangements will be provided for pupils moving to another primary school. Senior leaders of St James Primary School will meet monthly with the Local Authority throughout 2024-25 to consider progress against the recommendations of the recent Estyn Inspection. These meetings</p>

	<p>will also identify the integration of Rhydri Primary pupils into their new setting, identifying any further support that the school may require. Pupils moving to other primary schools will be subject to the usual transition arrangements between schools. As above, discussion will take place between schools to promote continuity of learning and raise awareness of individual needs.</p>
<p>A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i></p>	<p>Subject to Cabinet approval, the School Admissions Team will work with parents to support transition to a new school.</p> <p>As this proposal is to close at the end of the academic year 2025. There will be no impact on the delivery of education during the school year.</p> <p>Rhydri Primary School is a feeder for St Martins Secondary School and the proposed allocation of St James Primary School is also a feeder school for St Martins. As such, this proposal will have no perceived impact on the current arrangement at Secondary level.</p>
<p>A Wales of Vibrant Culture and Thriving Welsh Language <i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>Consideration will be given to the Welsh Language Education: White Paper to enhance Welsh language provision in maintained schools that are not already designated Welsh-medium schools.</p>
<p>A Globally Responsible Wales <i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Under the School Funding (Wales) Regulations 2010, Individual school budgets are determined using a locally agreed funding formula in accordance with factors which are learner led. Schools must be able to demonstrate via a financial action plan that the school will work to deliver a balanced budget. However, the Head Teacher and Governing Body have acknowledged that Rhydri Primary School is facing a significant financial deficit with pupil numbers projected to further decrease moving forward.</p> <p>The proposal, if agreed, will result in the closure of Rhydri Primary School which has been identified as no longer financially viable to operate by the Governing Body.</p>

	Community provision will continue to operate from other neighbouring schools/venues and further use will be encouraged which will include the opportunity for families to learn / engage in multiple activities including Welsh Language where this is not already established
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7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have ‘due regard’ for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [Policy Making Standards - Good Practice Advice Document](#)

Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
Links with Welsh Government’s Cymraeg 2050 Strategy and CCBC’s Five Year Welsh Language Strategy 2022-2027 and the Language Profile	This proposal has no anticipated impact on the current Welsh language curriculum offer provided.	Consideration will be given to the Welsh Language Education: White Paper to enhance Welsh language provision in maintained schools that are not already designated Welsh-medium schools.	Not applicable
Compliance with the Welsh Language Standards. Specifically <i>Standards 88 - 93</i>	<p>This proposal has no anticipated impact on the current Welsh language curriculum offer provided.</p> <p>All documentation including the website relating to the proposal is produced in Welsh and English, further supporting use the Welsh language and treating the Welsh language no less favourably than the English language.</p>	<p>The process during both the Consultation period and Objection period will ensure that key consultees are targeted as outlined in the CCBC Consultation and Engagement Framework; the process will provide opportunities to respond in the language of choice – Welsh or English.</p> <p>In addition, the views of children and young people affected by this proposal will be consulted upon through targeted information and</p>	Historical Consultation Processes involving Bi-lingual Signage as standard across all Council facilities to future proof buildings and increase exposure to the Welsh Language

	All consultation responses can be sent and received in Welsh and English ensuring that the Welsh language is treated no less favourably than the English language.	feedback sessions and the production of child friendly versions of the documentation also available in either Welsh or English.	
Opportunities to promote the Welsh language <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i>	This proposal has no anticipated impact on the current Welsh language curriculum offer provided.	Consideration will be given to the Welsh Language Education: White Paper to enhance Welsh language provision in maintained schools that are not already designated Welsh-medium schools.	All documentation published on the Sustainable Communities for Learning website relating to the proposal will be translated through the Council's Equalities and Welsh Language Team.
Opportunities for persons to use the Welsh language <i>e.g. staff, residents and visitors</i>	All documentation including the website relating to the proposal is produced in Welsh and English, further supporting use the Welsh language and treating the Welsh language no less favourably than the English language. All consultation responses can be sent and received in Welsh and English ensuring that the Welsh language is treated no less favourably than the English language	Not applicable	Not applicable
Treating the Welsh language no less favourably than the English language	Any meetings with the school to discuss provision of education through the child / family's preferred language and the right that they have to this under the	Not applicable	Historical Engagement Activities undertaken through the School Organisation Code and the Council's Consultation and Engagement Strategy

	<p>Welsh Language Measure can be accommodated on request.</p> <p>All documentation including the website relating to the proposal is produced in Welsh and English.</p>		
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<p>Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.</p>
<p>The headteacher and governing body have requested the closure of the school due to falling numbers and issues with financial viability. This proposal will have no negative impact on the Welsh language curriculum delivery to pupils when compared with the existing offer, other than this provision will solely be delivered through an alternative primary school the location of which is subject to parental preference.</p> <p>As outlined previously, there is the potential to widen access to community facilities and activities through the medium of Welsh which will be explored if the proposal progresses.</p> <p>The School Organisation Code 2018 is the prescribed process for progressing this proposal.</p>

8. Data and Information

(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?
<p>Rhydri Primary School provides education to pupils between the ages of 3 and 11 and has a capacity figure of 91 places with a published admission number of 13.</p> <p>At time of writing, the number of pupils anticipated to attend the school in September 2024, is 39 pupils (31 Full Time</p>	<p>At the end of the 2023/2024 financial year the school reported on a deficit budget of £22,000, and despite cutting back in all areas working closely with the Local Authority, the school have submitted their 2024/2025 figures of a deficit budget of £175,000. When a school reports a deficit budget, they must produce a 3 year action plan that will return</p>	<p>All reasonable alternatives to closure have been explored, and all avenues presented by the Governing Body explored including the viability of a Church of Wales School option. However, the projected pupil numbers and resultant deficit financial outlook for the school provides a significant challenge to the Head and School Governors to agree a</p>

<p>and 8 Part Time) with 79% of these pupils residing outside of the catchment area of the school. Based on the anticipated numbers for September 2024, surplus places will be at 62% and projected to increase in future years as the number of pupils predicted to attend the school is anticipated to decline linked to a reduction in live birth rates in the area and parental preference.</p> <ul style="list-style-type: none"> • Collaboration with Bedwas Junior School (implemented in February 2014) • Federation with Bedwas Junior School (implemented in September 2019) • Recommendation from LA relating to Class Reduction from 3 to 2 (not taken up) • Parental marketing campaign • The agreed timeline for the Governing Body to produce a balanced budget was extended from 3 to 5 years as agreed by the Authority's Section 151 Officer. 	<p>the budget to a surplus position. Whilst there is an option to explore this over a 5 year period with permission from the Local Authority's Section 151 Officer, even over a 5 year period, a surplus position remains unachievable for the school.</p>	<p>balanced budget to maintain the school and an appropriate staffing level, which has led to a request from the Governing Body at its meeting of the 14th March 2024 to the local authority to consider closing the school from July 2025 and undertake the required Statutory Consultation.</p>
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<p>Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled? <i>Details of further consultation can be included in Section 9.</i></p>
<p>Additional Supporting information considered included:</p> <ul style="list-style-type: none"> • 2021 Census Data • Welsh Language Use Survey 2019-2020 • Position of the Welsh Language – Commissioner's Report • Annual Population Survey

- Welsh Language Commissioner’s Assurance Reports
- National Survey for Wales: culture and Welsh language
- Cymraeg 2050: Annual Reports Cymraeg 2050: annual reports
- Health and Welsh Language Data
- Data relating to the Welsh Language and the economy

9. Consultation

(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. [Consider the Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.

Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.

Through [TeamCaerphilly - Better Together](#), the Council is committed to ensuring high quality, citizen focused services for the communities that comprise our county borough. In future-proofing public services, we recognise the need to ensure effective engagement which is central to our decision making - [Read more about our approach to Consultation and Engagement here](#)

For this proposal, our consultation process must follow the Welsh Government Statutory guidance as set out in the School Organisation Code 2018.

The formal consultation process begins on Monday 9th September 2024

This consultation document and response form are available electronically on the Council website.

If you would like this information in any other format, for example large print, or help with interpretation in a different language, please contact us on 01443 864817 / 21stCenturySchools@caerphilly.gov.uk so that the necessary arrangements can be made to provide this service.

The closing date for responses to this consultation is midnight on Tuesday 22nd October 2024

Unfortunately, we will not be able to consider any responses received after this date.

Your views matter and we want you to tell us what you think about the changes we have proposed in this document. We would like you to consider the information contained within the document and to hear your views as to whether or not you support the proposal. All views are welcomed in support of or opposed to the proposal. This is your chance to ask questions and make comments that will be considered when the Council decides how to proceed.

If you would like to comment on the proposal, you can do this by:

- Completing the online response form on the Council’s website
- Complete a printed response form and return via post
- Email your comments to the Sustainable Communities for Learning Team at Caerphilly

Further information is available on the [Sustainable Communities for Learning webpage](#)

10. Monitoring and Review

<p>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</p>	<p>The Council’s will work closely with all relevant parties to ensure that processes are adhered to, and support is provided as required.</p>
<p>What are the practical arrangements for monitoring?</p>	<p>The consultation period will be for 42 days (with at least 20 of these being school days) to provide adequate time for consideration and response and conscientious consideration will be given to any responses received.</p> <p>The principles of engagement outlined in the Local Authority's Consultation and Engagement Framework 2020 will also be acknowledged and the team will engage with any additional 'interested parties' as required, through appropriate channels to ensure the dissemination of information and provision of a suitable platform for the consultees to make their views known is made available.</p> <p>Following the consultation period, a consultation report along with any responses received will be collated and reported back to Members, where a decision will be made as to whether to proceed with the proposal as outlined and publish a Statutory Notice.</p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p>Once a final determination is made on the proposal by Cabinet, should the proposal then be implemented as outlined, the Council will work closely with the school to ensure the transition has minimal impact on the pupils, staff, families and local community.</p>
<p>When is the proposal due to be reviewed?</p>	<p>It is currently anticipated that the consultation process would be undertaken as per the following timeline based on approval at each stage of the process:</p> <ul style="list-style-type: none"> ● Consultation Opens – 9.9.24 ● Scrutiny (as consultee) – 15.10.24

	<ul style="list-style-type: none"> • Consultation Ends – 22.10.24 • Scrutiny (to consider Consultation Report & endorse publication of Statutory Notice) – 26.11.24 • Cabinet (to consider Consultation Report & agree publication of Statutory Notice) – 11.12.24 • Statutory Notice / Objection Period Opens – 13.1.25 • Statutory Notice / Objection Period End – 10.2.25 • Scrutiny (to consider Objection Report) – 11.3.25 • Cabinet (to make final determination) – 16.4.25
Who is responsible for ensuring this happens?	<p>Scrutiny Members and Cabinet Members will be asked to review the proposal and endorse / make the final determination as to whether to implement the proposal.</p> <p>If approved, it will be the responsibility of the Author(s) of this report (or nominated officer within their section) to ensure the Integrated Impact Assessment and proposal is reviewed and any mitigating actions followed up on and actioned.</p>

11. Recommendation and Reasoning

	Implement proposal with no amendments
X	Implement proposal taking account of the mitigating actions outlined
	Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance? Yes

12. Reason(s) for Recommendation

(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the “Summary of Integrated Impact Assessment” section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).

Local authorities are responsible for the planning and management of school places and must secure provision efficiently so as to focus resources on improving. This is something which both Welsh Government and Estyn recognise.

In addition, it is the responsibility of the Council to identify those school organisation and asset management strategies that contribute most positively to outcomes for learners.

Due to the falling rolls and significant projected deficit budget at Rhydri Primary school, several meetings were arranged by the Head Teacher and the Governing body with Local Authority representatives including the Chief Education Officer, to discuss the future viability of the school. At the conclusion of these meetings in March 2024, the Governing Body advised that the school could no longer maintain a balanced budget and an appropriate staffing level, therefore requested the Local Authority start the consultation process to pursue the proposed closure of Rhydri Primary School with effect from July 2025.

All reasonable alternatives to closure have been explored:

- Collaboration with Bedwas Junior School (implemented in February 2014)
- Federation with Bedwas Junior School (implemented in September 2019)
- Recommendation from LA relating to Class Reduction from 3 to 2 (not taken up)
- Parental marketing campaign
- The agreed timeline for the Governing Body to produce a balanced budget was extended from 3 to 5 years as agreed by the Authority's Section 151 Officer.

In addition, all avenues presented by the Governing Body and raised at Cabinet on the 24th July 2024 have been explored including the viability of a Church of Wales School option, the option to extend to 5-year financial recovery plan, by permission of Section 151 Officer and consideration of ALN provision.

It is therefore the recommendation of this Integrated Impact Assessment and in line with the processes outlined in the School Organisation Code 2018 that Members endorse/approve the proposal:

- The proposal relates to the closure of Rhydri Primary School with effect from July 2025, following a request to consult from the Governing Body of the School made at their meeting of the 14th March 2024.

13. Version Control

(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time)

Version No.	Author	Brief description of the amendments/update	Revision Date
1	Andrea West / Lisa Thomas	This Integrated Impact Assessment has been undertaken to ensure compliance with the socio-economic duty set out in section 1 of the Equality Act 2010. Original Publication Date: September 2024	Subject to approvals at each stage, post Statutory Notice.

Integrated Impact Assessment Author

Name:	Andrea West
Job Title:	Place Shaping and Sustainable Communities for Learning Service Manager
Date:	April 2024

Name:	Lisa Thomas
Job Title:	Place Shaping and Sustainable Communities for Learning Manager
Date:	April 2024

Head of Service Approval

Name:	Sue Richards
Job Title:	Head of Education Planning and Strategy
Date:	May 2024
Signature	<i>S. Richards</i>