

Rural Development Sub-Committee

Inquiry into Reorganisation of Schools in Rural Wales Response from Dwyfor Meirionnydd Constituency Labour Party

Dear Ms Morris

We are responding to the “**Call for evidence**” by the Rural Development Sub-Committee in its “**Inquiry into the re-organisation of schools in rural Wales**”.

As you and the Inquiry Committee will be aware, Dwyfor Meirionnydd features heavily in the proposals that have been drawn up by Gwynedd Council for closure of rural schools. This has been the dominant local political issue of the last 12 months and we have researched the issue and discussed the implications carefully.

The attached document is intended to assist the Inquiry. Our evidence addresses to a greater or lesser degree each of the areas that the Inquiry is focussing on in particular, viz:

- the educational context of rural schools;
- whether there are any wider social and educational issues associated with rural school reorganisation, such as the impact on rural communities, families and children and how this is taken into consideration as part of the decision-making process;
- examples of reorganisation in rural Wales and elsewhere to understand the experiences and learn from any innovative approaches;
- existing and proposed Welsh Assembly Government policy and guidance and whether they adequately deal with the wider issues that may be associated with the reorganisation of rural schools; and
- the role of Estyn in reporting on schools and LEAs.

We would be happy to expand upon, or to clarify, any aspects of our evidence either by email or in Cardiff Bay. I personally am a frequent visitor to Cardiff.

We are copying this email and attachment to Joyce Watson and Alun Davies, who are our local Assembly Members, of course.

A copy of our document has also been sent to you by post.

Yours sincerely,

Tom Brooks
Vice Chair Dwyfor Meirionnydd CLP
Glan Eifion
Seaview
Borth y Gest
Porthmadog
LL49 9TP

**Response by Dwyfor Meirionnydd
Constituency Labour Party to**

**The Call For Evidence By
The National Assembly For Wales
Rural Development Sub-Committee**

In Its

**Inquiry Into The Re-Organisation Of
Schools In Rural Wales**

29 June 2008

Submitted on behalf of Dwyfor Meirionnydd CLP
By Tom Brooks
Vice Chair

**Glan Eifion
Seaview
Borth-Y-Gest
Porthmadog
Gwynedd LL49 9TP**

**Tel : 07968 437 060
e-mail: Draxmont tjb@btinternet.com**

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SUMMARY

10 years ago the UK Government and Welsh Assembly Government promoted a policy in which rural and small schools, particularly at the primary level, were valued for their contribution to children's development and education. In England, the Secretary of State included in guidance a definitive presumption against closure of rural schools. The guidance on school closures states that: "In considering statutory proposals to close a rural school, the Decision Maker should have regard to the need to preserve access to a local school for rural communities. There is therefore a presumption against closure of rural schools."

Although in Wales there is no presumption against rural closures either in legislation or guidance, the current definitive document in Wales the "School Organisation Proposals - National Assembly for Wales Circular No: 23/02: July 2002", states, "This does not mean that rural schools should always remain open but the case for closure has to be robust and the proposals must be in the best interests of educational provision in the area".

In both countries, supplementary funding was ring fenced for the benefit of small and rural schools, including in Wales the use of the "Better Schools Fund".

In 2004 the Lyons Review on Asset Management in the public sector (Towards better management of public sector assets) was published. This triggered a change in emphasis, if not a change of policy. The total value of public sector assets is huge with land and buildings (including schools) accounting for two thirds of it. Since 2004, there has been greater pressure upon public bodies to consider their utilisation of assets as a high priority activity. In Wales the threat this has presented to rural schools has been evidenced by school reorganisation proposals in Powys and Gwynedd in particular. Hence we consider that 'Financial Pressures' should be added to the list of drivers in the background to the 'Call for Evidence'.

This 'Response' addresses to a greater or lesser degree each of the areas that the Inquiry is focussing on in particular, viz:

- the educational context of rural schools;
- whether there are any wider social and educational issues associated with rural school reorganisation, such as the impact on rural communities, families and children and how this is taken into consideration as part of the decision-making process;
- examples of reorganisation in rural Wales and elsewhere to understand the experiences and learn from any innovative approaches;
- existing and proposed Welsh Assembly Government policy and guidance and whether they adequately deal with the wider issues that may be associated with the reorganisation of rural schools; and
- the role of Estyn in reporting on schools and LEAs.

In Gwynedd the County's School Reorganisation Proposal envisaged closing 58 of the 106 primary schools, making 21 sites immediately available for disposal. 37 of the remaining sites are proposed to become remote classrooms attached to a new school in some form of "federalisation". These 37 sites would no longer be 'schools' and their use can be ceased and the sites can be disposed without further statutory public consultation.



The view of many in Gwynedd is that the County has been motivated more by the asset disposal pressures arising from 'Lyons' than the educational need of the children.

Evidence Based Conclusions

This document shows that:

- ◆ Although the prime consideration for rural Wales should be the One Wales Agreement pledge that "Schools must work in partnership with parents and the community to deliver real and lasting benefits for all children, whatever their background", the evidence from the Gwynedd Council primary schools reorganisation consultative document proposal is that the Council is in conflict with this pledge. By proposing to formally close 58 schools and to deny communities their own governing bodies and PTAs, Gwynedd Council is not supporting the development of community schools.
- ◆ The drastic programme of closures proposed for Gwynedd is based upon a figure of 90 pupils representing the number which is recognised by the Assembly as constituting a "viable" school. The Gwynedd 'Reorganisation of Primary Schools' document states¹ "90 pupils represents the number which is recognised by the Assembly as constituting a "viable school"". We have not been able to locate this statement in any published Welsh Assembly Government document, nor have we found any justification for the 'watershed number' of 90 pupils in the large quantity of research material on smaller schools that exists. **Our knowledge and experience in Gwynedd is that schools with 24 or more pupils are succeeding in providing quality education at primary level. This is supported by the number of compliments made in 'Estyn' reports on the attainment and child development within such schools. It would be of value to the Rural Development Sub-Committee's Inquiry to explore further with Welsh Assembly Government civil servants how this apparent definitive number of 90 pupils came to be adopted by Gwynedd as the number which is recognised by the Assembly as constituting a "viable school".** We have seen no evidence for such a high watershed in the minimal number of pupils needed to deliver a "viable school", and the existence or otherwise of this allegedly Welsh Assembly Government "viable" school figure is crucial to the Rural Development Sub-Committee's Inquiry.
- ◆ The quality of the education delivered in Gwynedd is not substandard. The Core Subject Indicator (CSI) statistics confirm this point. Many Estyn reports on Gwynedd schools are excellent. It would be irrational if Gwynedd Council were permitted to risk disturbing a largely successful education system by proposing such a major upheaval.
- ◆ Educational standards in Gwynedd have been good and the proposals in the Gwynedd Single Education Plan could fine tune delivery to slightly higher standards through judicious modification of the current arrangements. There is no numerate prediction in the Gwynedd reorganisation plan of the educational standards that would result from the major school reorganisation proposed.
- ◆ Education standards in Gwynedd currently are consistently high. However, removing the highly valued link between rural communities and their primary school, reducing parental and community opportunities to support their school, extending the school day for primary school

¹ Section 5.2.7



children through adding the travelling time needed to reach other sites, are all viewed by the community as likely to affect children's ability to maintain the current high standards.

- ◆ The small school closures planned are not addressing the challenge of surplus places. Schools serving small rural communities appear to be being sacrificed partly to address surplus places in larger schools and partly because site asset disposal (after Lyons) is likely to be easier to achieve and financially more attractive when the sites are located in rural areas.
- ◆ Gwynedd Council does not explain how the Primary School reorganisation plan would aid the successful introduction of the Welsh Assembly Government's revised curriculum for 3 to 19-year-olds in Wales, which is intended to be implemented from September 2008 onwards, nor the Welsh Assembly Government's new approach to learning for children from 3-7 years of age known as a 'Foundation Phase'. In our view the failure to address these initiatives were important omissions since the processes of teaching within the classroom are far more important to delivering quality education than any reorganisation of teaching premises
- ◆ The level of financial funding provided by the Welsh Assembly Government to Gwynedd Council did not create pressures that justified an educationally disruptive planning response, such as that Gwynedd Council made.
- ◆ The presentation of financial data in the Gwynedd Council proposal document is substandard and hence it is not surprising that several councillors have been confused by the presentation of the officers' case. There is a dearth, indeed on most topics an absence, of projected financial data which would result from implementing the proposed plan. Residents of Gwynedd feel they are simply being asked to gamble that the disruptive primary school reorganisation reshuffle offered might produce some unidentified improvement somewhere.
- ◆ Gwynedd Council states that it will require £30million plus of capital funds to implement the proposals, but the source of such funding is not identified.
- ◆ There are major problems created by Gwynedd's suggestion that school federalisation is adopted widely in the County. Federalisation creates a number of detached classrooms remote from the principle school site, cuts links between the school and the community by abolishing the local governing body and PTA, leads to staff reductions, much school transportation of children and funding reductions in rural areas. As yet, unlike England, there is no statutory instrument in place in Wales through which to implement a federalisation scheme, although WAG Civil Servants are said to be working on such a scheme.
- ◆ The Welsh Assembly is to be congratulated in promoting the Statutory Instrument, "The Collaboration Between Maintained Schools (Wales) Regulations 2008". This initiative to encourage **voluntary** cooperation between schools is much to be preferred to any **compulsory** 'federalisation scheme', such as that Gwynedd apparently prefers. We consider federalisation will undermine the WAG 'One Wales Agreement' principle that "we will support the development of community schools".



Preferences And Recommendations

- A. It is to be hoped that the Rural Development Sub-Committee's Inquiry will, after examining closely the evidence, conclude that community schools do directly enhance the direct educational achievement of children.
- B. In Wales there is no presumption against rural closures either in legislation or guidance. The Inquiry should examine the benefits to Wales of following England (and now Scotland) in adopting a formal presumption against rural closures
- C. To aid in operating the system of the presumption against closure of rural schools, England has published a definitive list of 5,156 schools designated by the Department for Children Schools and Families as "rural". The Rural Development Sub-Committee's Inquiry could do much to assist rural areas by recommending that the presumption against closure is included in a Welsh Statutory Instrument and that a list of rural schools in Wales should be published to complement the list in England.
- D. It is understood that the Welsh Assembly Government Minister for Education, Children & Young People (Minister) is seeking new plans from LEAs to be successors to the almost completed 'Single Education Plans', that the scope of these new plans will vary significantly from the scope of the 'Single Education Plans' **and it is hoped that the report of the Rural Development Sub-Committee's Inquiry will do much to inform the requirements for the new educational plans for rural areas.**
- E. We would ask the Inquiry to consider whether the Minister should have scrutinised the Gwynedd schools reorganisation plan **before** it went out to consultation to ensure that it conformed with WAG guidance. In particular, how the Welsh Assembly Government should have ensured that Gwynedd Council conformed with the guidance advice that had been given to it, when it drew up its primary schools reorganisation plan: For example, how could the Minister ensure that alternative strategies for developing "community based and sustainable schools in Gwynedd" were included?
- F. We would ask the Inquiry to recommend that the Minister scrutinises the general suitability and quality of LEAs school reorganisation plans early in the consultation process, as is the WAG practice on structure plans, for example.
- G. **The Rural Development Sub-Committee's Inquiry could assist rural areas by recommending** that the Welsh Assembly Government's criteria for sustainability of primary schools is both strengthened, by including within it definitive measures, and requiring LEAs to include the WAG criteria as mandatory requirements supplemented as necessary by local ones
- H. **The Rural Development Sub-Committee's Inquiry is invited to recommend** that the Welsh Assembly Government strengthen its guidelines to require LEAs to demonstrate in school reorganisation proposals how their reorganisational plans will build upon national educational initiatives to the benefit of our children
- I. Providing primary education in very small schools can be expensive and there is a debate to be had about maintaining schools with very small numbers, (say) less than 24 pupils. The Inquiry is invited to recommend that WAG should issue national guidelines on the "per capita monetary allocation formula for small schools" and on the 'safety net' feature



- J. The Gwynedd Primary Schools Reorganisation Proposal document does not include a detailed financial plan nor much financial detail in respect of its proposal. There is reference in the consultative document to the inevitable need for transitional funding, but this is not detailed. There is also a reference that area schools will require substantial capital, but the source of this funding and the total capital investment required is not identified. **The Inquiry is encouraged to conclude that rural schools should not be proposed for closure unless the resultant capital works on all affected sites have been identified and the source and availability of funding for these works has been identified**
- K. The Inquiry is invited to recommend to WAG that as part of a schools reorganisation consultation process, it should require LEAs to publish a detailed financial plan on the implement the proposals if they were to be approved, covering both capital and recurrent financial budget implications.
- L. The Inquiry is invited to recommend that WAG, in its guidance to LEAs, should recognise more strongly that demographics are changing. The latest ONS population projections, published during the last 12 months, suggest that a significant increase in the birth rate for Wales is underway and that it is likely to be sustained for some years, supplemented through immigration of new European Community families
- M. The Inquiry should examine the impact on local nursery education and special needs teaching of small school closures and may conclude that WAG guidance should ensure that a primary schools reorganisation proposal should contain details of the provision of nursery education and special needs provision, both of which are threatened by closure of small schools.
- N. It is understood that some WAG civil servants have been examining whether arrangements may be made for an SI to specifically embrace federalisation might be available in Wales, perhaps based on one of the English models. The Inquiry is invited to conclude that whereas such a move may ease the administrative burden for WAG, it is the principle of federalisation which severs links between communities and schools and hence to initiate a debate on whether or not federalisation was appropriate in rural Wales
- O. The Welsh Assembly approved 'the SI 2008/168 (W 21) 'Collaboration Between Maintained Schools (Wales) Regulations 2008' which came into effect in March of 2008. The Inquiry is invited to explore the use of these regulations (and other related regulation) to **encourage** collaboration between schools in rural Wales in a manner that **does not threaten the independent identity** of each school and its relationship with its community
- P. We encourage the Inquiry to consider whether a clear statement of the type made in the House of Commons by the 'Schools Minister in England', Jim Knight MP which re-emphasised the value of rural schools by recording:
- A reconfirmation of the presumption against closing rural schools
 - Encouraging Authorities to promote shared governance arrangements
 - Providing additional funding to meet the extra costs of primary schools which arise due to sparsity of population
 - Encouraging Authorities to remove surplus places by paying particular attention to poorly performing schools in their strategy



- Asking Authorities to recognise that there will be more 'surplus' places in rural areas than there should be in urban areas
- The UK Government guidance to remove temporary accommodation from sites and to consolidate or adapt some of the 'surplus' accommodation on sites for alternative community use
- That rural schools have been clearly designated under Section 70(3) of the education Act 2005.

would assist rural schools in Wales

Further clarification of any points in this submission may be obtained from

Tom Brooks
Vice Chair
Dwyfor Meirionnydd Constituency Labour Party



THE CONTEXT OF THE INQUIRY AND THIS SUBMISSION

1. During the last few years, both Powys and Gwynedd Councils have focused much attention upon the potential for the "re-organisation of rural schools". Each Council has produced proposals for consultation and each has commenced a process which is intended to reduce the number of schools that it operates in rural areas.
2. On June 4th 2008, Powys Community Schools Action ('Powys') was examined by the Sub –Committee in respect of the written evidence that it had submitted to the 'Inquiry'. The Powys submission combined both national and UK evidence with examples of rural school planning practice that referred directly to Powys. This submission from Dwyfor Meirionnydd Constituency Labour Party also includes national and UK evidence but limits its comment on rural school planning practice to the experience from Gwynedd.
3. The Welsh Assembly Government policy in operation is based upon the 'One Wales Agreement'. This contains two policy statements of deep significance to education in rural areas as below.

“Schools must work in partnership with parents and the community to deliver real and lasting benefits for all children, whatever their background. To meet these challenges, our programme of government is that, over the four year term: (amongst other points) ”

◆ “We will support the development of community schools”

“We are determined that very young children will have every opportunity to develop and grow in a happy, healthy and supportive environment”

4. To meet its terms of reference to “examine the adequacy and interpretation of the guidance provided by the Welsh Assembly Government in relation to the management of education in rural areas, **the Rural Development Sub-Committee ‘Inquiry’ may wish to examine the extent to which the Welsh Assembly Government’s actual implementation of its policy in rural areas supports the One Wales Agreement commitments or otherwise.** In particular whether the ‘One Wales Agreement Delivery Plan’, which is light on actions in support of the above aims, should be strengthened? The relevant actions recorded in the ‘One Wales Agreement Delivery Plan’ are

Commitment number	One Wales commitment	Lead Department	2008-09	2009-10	2010-11	Delivery plan
112	Support development of community schools	DCELLS				Community focused schools grant increased to support out-of-school childcare element of programme throughout the planning period.

and

110	Progress provision of universal affordable childcare with additional support including extended free full time high quality childcare for 2 year olds in areas of greatest need	DCELLS				Additional funding in place in the Flying Start programme to implement increased provision throughout the planning period.
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5. **The Inquiry may wish to examine the extent to which the ‘Community focused schools grant’ and the ‘Flying Start programme’ are being effective in the schools in rural Wales or whether these actions need supplementing with other initiatives.**



6. The proposals produced for consultation by Gwynedd Council² neither proposed to enhance the way in which "Schools must work in partnership with parents and the community" nor outlined new provision to enable "very young children to have every opportunity to develop and grow in a happy, healthy and supportive environment". Gwynedd Council consulted on a proposal to reduce the number of primary schools in the County from 106 to 48 over a period of 5 years.
7. Gwynedd Council's proposal would, within 5 years, abolish 58 primary schools: The communities associated with 58 primary schools would lose their governing bodies, their school head teachers and their independent community Parent Teacher Associations. 21 communities would also lose their school buildings immediately, while other school buildings would be used as detached remote classrooms, for a period of time, possibly a short one, until further 'local LEA' reorganisation determines otherwise.
8. Any action, such as Gwynedd Council's proposal to abolish 58 primary schools, within 5 years, could hardly be projected as supporting the 'One Wales Agreement' objective that "schools must work in partnership with parents and the community to deliver real and lasting benefits for all children". The response of communities in the May County Election in Gwynedd was predictably one of anger, and 15 Gwynedd Councillors lost their seats to a new community organisation (Llais Gwynedd), despite Llais Gwynedd having only a few months available to organise.
9. The case presented by Gwynedd Council³ for the closure of more than half of its primary schools was recorded as:

"Here are the principal reasons for reorganisation of Gwynedd primary schools:

- Reduction in pupil numbers;
- Average size of schools low;
- Shortage of Headteachers and pressure of work;
- Career structure for Headteachers';
- Condition and suitability of the County's primary school buildings;
- Significant variation in cost per child;
- Low capacity utilisation of schools;
- Significant variation in class sizes;
- Financial factors"

10. As can be seen, **no direct educational factors, neither academic attainment nor the development of the child were cited as reasons for the proposed massive upheaval.** It is to be hoped that the Rural Development Sub-Committee's Inquiry will, after examining closely the evidence, conclude that community schools do directly enhance the direct educational achievement of children. The Powys statement to your Inquiry lists a number of national sources of evidence and this document includes the statistical evidence from Gwynedd.
11. Inquiry members will also be aware that the Welsh Assembly Government (WAG) required each local education authority (LEA) to submit by September 2006 a document entitled "a Single Education Plan". These were duly produced and laid out the LEA's strategy until August 2008. The Gwynedd 'Single Education Plan' is understood to be similar to others in Wales, in that it did **not** signal any intent to introduce a substantial programme of school closures. The 'Single Education Plans' were accepted by the then WAG Minister, since which time Gwynedd, at least, has made a proposal for primary education that varies significantly from its single educational plan.
12. It is understood that the current Minister is seeking new plans from LEAs to succeed the 'Single Education Plans', that the scope of these new plans will vary significantly from the scope of the 'Single Education Plans' **and it is hoped that the report of the Rural Development Sub-Committee's Inquiry will do much to inform the new educational plans for rural areas.**

² Reorganisation of Primary Schools in Gwynedd for the Educational Benefits of all our Children – Consultation Document January 2008

³ Reorganisation of Primary Schools in Gwynedd for the Educational Benefits of all our Children – Consultation Document January 2008 Section 3.1



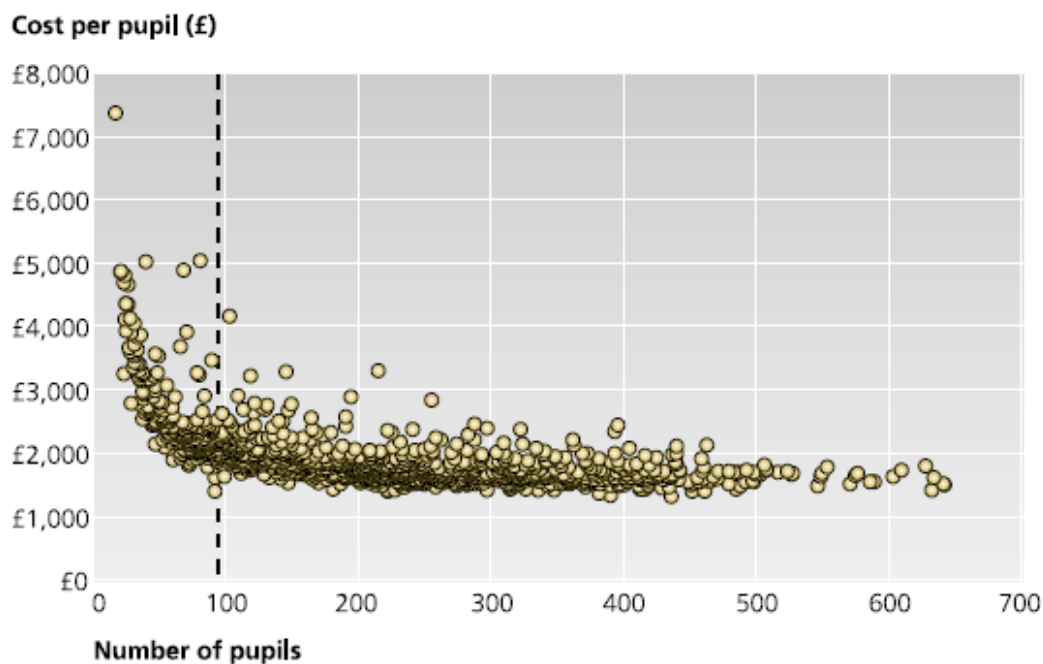
DEFINITIONS

What Is The Definition Of A Small School?

13. There is no conveniently available definition of a small school or of a rural school, that we have been able to obtain. Neither the Welsh Assembly Government (WAG) nor the English Department for Children Schools and Families publishes one on its web site.
14. In August 2007, Mrs Sylvia Lindoe of the Schools Management Division wrote to the Welsh Local Government Association on "the possibility of transferring current funding ring-fenced within the Better Schools Fund for small and rural schools into another grant for the same purpose".
15. We have asked the Welsh Assembly Government Minister for Education, Children and Young People for a copy of the definition of a "small school" and of a "rural" school used to direct the spending of the Better Schools Fund, but at the time of writing this submission we have not had a response. **The Inquiry may wish to obtain definitions from the Minister.**
16. It is sometimes said that the Audit Commission considers schools with less than 90 pupils to be small schools. We understand that this misrepresents their position in that the criteria that the Audit Commission uses to determine whether a school is "small" or not depends on the context. For example in 2002, the Audit Commission published a report entitled "Trading Places". This stated (6.21):

"There is no exact definition of what constitutes a small school. Analysis of school expenditure per pupil against numbers on roll shows a marked increase once numbers of pupils fall below a particular point. For example, spending per pupil in primary schools shows a marked increase for schools with fewer than about 90 pupils [EXHIBIT 7]."

Exhibit 7 Cost per pupil in primary schools



Unit costs are much higher for schools with fewer than 90 pupils.



21. In Trading Places, the Audit Commission classified schools where there was a "marked increase in spending per pupil" as a small school. Hence the size of a small school will vary from LEA to LEA depending upon the financial support structure implemented to support smaller schools subsidized by the WAG Better Schools Fund.
22. The English Department for Children Schools and Families does not publish a precise definition but English guidance for small schools assumes that the school includes "mixed year teaching" and addresses such factors as guidance for two years curriculum cycles to attain mixed year teaching.
23. Under this interpretation of including mixed year teaching, many schools in counties such as Gwynedd would qualify as "small schools".
24. It is interesting that the Gwynedd 'Reorganisation of Primary Schools' document states⁴ "90 pupils represents the number which is recognised by the Assembly as constituting a "viable" school. We have not been able to locate this statement in any published Welsh Assembly Government document, nor have we found any justification for the watershed of 90 pupils in the large quantity of research material on smaller schools that exists.
25. **Our knowledge and experience in Gwynedd is that schools with 24 or more pupils are succeeding in providing quality education at primary level. This is supported by the number of compliments made in 'Estyn' reports on the attainment and child development within such schools.**
26. **It would be of value to the Rural Development Sub-Committee's Inquiry to explore further with Welsh Assembly Government civil servants how this apparent definitive number of 90 pupils came to be adopted by Gwynedd as the number which is recognised by the Assembly as constituting a "viable school".** We have seen no evidence for such a high watershed in the minimal number of pupils needed to deliver a "viable school", and the existence or otherwise of this allegedly Welsh Assembly Government "viable school" figure is crucial to the Rural Development Sub-Committee's Inquiry.

What Is The Definition Of A Rural School?

27. Again there is no conveniently available definition of a rural school.
28. We understand that the definitive document in Wales remains the "School Organisation Proposals - National Assembly for Wales Circular No: 23/02: July 2002" This refers to rural schools but does not define them stating⁵

"In the case of rural schools particular considerations include:

- the educational challenges faced by small schools
- the home to school transport implications and increased journey times
- the overall effect on the community of closure and the extent to which the school is serving the whole community as a learning resource

This does not mean that rural schools should always remain open but the case for closure has to be robust and the proposals must be in the best interests of educational provision in the area".

29. As Powys pointed out in their evidence to the Inquiry, presumption against closure has been the statutory basis in England since 1998. On 18th February 2008, the Department for Children Schools and Families responded in Hansard to a series of questions in relation to the English policy and rural schools. The questions and answers are reproduced as Annex 'A' of this submission.
30. To aid in operating the system of the presumption against closure of rural schools, England has published a definitive list of 5,156 schools designated by the Department for Children Schools and Families as "rural". **The Rural Development Sub-Committee's Inquiry could do much to assist rural areas by recommending that the presumption against**

⁴ Section 5.2.7

⁵ 1.11



closure in included in a Welsh Statutory Instrument and that a list of rural schools should be published as in England.

What Is The Definition Of A Community School?

31. The "School Organisation Proposals - National Assembly for Wales Circular No: 23/02: July 2002" states "The guidance applies to community, voluntary and foundation schools", but the Circular does not define community schools. The word 'community' is used in relation to schools frequently in the document.
32. It is clear from the context of the use of the phrase 'community schools' that the National Assembly intended 'community' to embrace choice. The document does NOT define a school as synonymous with a geographic area. Parental choice has been a significant factor in the planning of educational provision for least 30 years.
33. A community school is one that serves a grouping of persons who in broad terms wish to associate one with another in the education of their children. Persons living in the same geographic locality may wish to form a community for educational purposes based upon geography, or they may wish to join a community the conducts its education in the medium of either Welsh or English. They may also wish to associate with a community that adheres to a particular faith such as a Roman Catholic school or an 'Anglican' Church school and more recently a Jewish or Muslim school.
34. The key issue is that people **choose** to join a particular community for educational purposes and the current statute requires that those parental wishes should be satisfied where possible.



WELSH ASSEMBLY GOVERNMENT RESPONSIBILITY AND POLICIES

Do the responsibilities laid down in the Education Act 1996 still hold?

35. The Education Act 1996 lays down that:

10. General duty of Secretary of State.

The Secretary of State shall promote the education of the people of England and Wales.

11. Duty in the case of primary, secondary and further education.

— (1) The Secretary of State shall exercise his powers in respect of those bodies in receipt of public funds which—

(a) carry responsibility for securing that the required provision for primary, secondary or further education is made—

(i) in schools, or

(ii) in institutions within the further education sector, in or in any area of England or Wales, or

(b) conduct schools or institutions within the further education sector in England and Wales, for the purpose of promoting primary, secondary and further education in England and Wales.

— (2) The Secretary of State shall, in the case of his powers to regulate the provision made in schools and institutions within the further education sector in England and Wales, exercise his powers with a view to (among other things) improving standards, encouraging diversity and increasing opportunities for choice.

36. These over-riding duties of the Welsh Assembly Government Minister are understood to hold today, notwithstanding her delegation of detailed responsibilities to LEAs nor in some cases, the delegation by the National Assembly to the Minister of some of powers in relation to education that reside with the National Assembly.

How is the Educational Minister discharging those responsibilities?

37. In addressing that aspect of its terms of reference which state:

“The Rural Development Sub-Committee will conduct a short inquiry into the adequacy and interpretation of the guidance provided by the Welsh Assembly Government with regard to the management of education in rural areas, focusing specifically on the reorganisation of rural schools, which has been a major social and political issue in communities throughout Wales.”

the Inquiry will be forming a judgement, directly or indirectly on how, and how well, successive ‘Education’ Ministers in Wales have discharged their 1996 Education Act duties.

38. We note the terms of reference for the Rural Development Sub-Committee Inquiry to consider:



- Examples of reorganisation in rural Wales and elsewhere to understand the experiences and learn from any innovative approaches;
 - Existing and proposed Welsh Assembly Government policy and guidance and whether they adequately deal with the any (sic) wider issues that may be associated with the reorganisation of rural schools;
39. Within this context we would ask the Inquiry to consider whether the Minister should have scrutinised the Gwynedd schools reorganisation plan before it went out to consultation to ensure that if it was approved, it would meet the requirement of "improving standards, encouraging diversity and increasing opportunities for choice".
40. We would also ask the Inquiry to consider whether the Minister should have reviewed the Gwynedd Schools Reorganisation Plan in the context of the Gwynedd Single Education Plan which she had received and approved.

The Consultation Process In Gwynedd

41. To assist the Inquiry, as required in its terms of reference, in exploring "examples of reorganisation in rural Wales and elsewhere to understand the experiences and learn from any innovative approaches" we would comment upon the consultation process in Gwynedd.
42. Education is a service that is important to every resident of an area. The Gwynedd Council focus on consultation with "governors and parents"⁶ instead of consultation with the whole community, demonstrate the narrowness of the consultation process that Gwynedd Council undertook when formulating the consultation document.
43. This approach by Gwynedd was contrary to advice given in the "School Organisation Proposals - National Assembly for Wales Circular No: 23/02: July 2002", which advises LEAs⁷ to take into consideration "the views of parents **and other local residents**, including views relating to parental choice and the impact on the local community".
44. The Wales Circular No: 23/02: July 2002" also advises LEAs to consider alternatives to closure. The Gwynedd Schools Reorganisation Plan offers few alternatives for the community to consider. The consultation document does not offer varying sets of 'Aims and Objectives' that the residents of Gwynedd can choose between. Alternative strategies for developing "community based and sustainable schools in Gwynedd" were not offered for consultation. Gwynedd Council confirmed that it had agreed a strategic approach of a comprehensive plan **before** any consultation had commenced. The Gwynedd Schools Reorganisation Plan document states⁸ "It was agreed some time ago that a Comprehensive Plan was required of the entire County, which identified a new arrangement and contemporary structure for primary education".
45. The Inquiry terms of reference includes the consideration of, "Whether there are any wider social and educational issues associated with rural school reorganisation, such as the impact on rural communities, families and children and how this is taken into consideration as part of the decision making process". In this context, we would ask the Inquiry to consider whether the Minister should have scrutinised the Gwynedd schools reorganisation plan before it went out to consultation to ensure that alternative strategies for developing "community based and sustainable schools in Gwynedd" were included.
46. The section in the Gwynedd Schools Reorganisation Plan consultation document on 'Aims and Objectives' contains several unsubstantiated 'sound bytes', such as "it is impossible for the LA to maintain 106 sites in future"⁹, and "increase the average size of the County's primary schools"¹⁰. The aims 'Aims and Objectives' in the Plan are devoid of measurable goals. For the timeline of the Gwynedd Schools Reorganisation Plan, no targets were set, or forecasts made, for the educational improvement standards to be achieved, such as through the CSI indicator attainment forecast, nor for the number of surplus places to be removed, nor for the educational budget to be saved nor for the capital to be raised through site disposal etc.

⁶ 1.1.3

⁷ 2.2

⁸ 4.1.2

⁹ 4.2.10

¹⁰ 4.3.1



47. Again we would ask the Inquiry to consider whether and how the Welsh Assembly Government Minister should have ensured that Gwynedd Council, when drawing up the Gwynedd Schools Reorganisation Plan, had conformed with the guidance advice that had been given to it.



EVIDENCE FROM THE GWYNEDD CONSULTATION

Small Schools Do Not Lead To Poorer Educational Standards

48. Gwynedd Council received a report from Mr Roy James, Education Adviser and Former Principal Inspector for Education in Wales, on primary schools organisation in the County, at the end of 2004; This was a prime source of professional advice relied upon as evidence in the Gwynedd consultation document, "Reorganisation of Primary Schools in Gwynedd for the Educational Benefits of all of our Children". Mr James opinions were supplemented by those of Mr Gareth Davies Jones, former H. M. Inspector and independent consultant on the subject of federated schools.
49. The Gwynedd Primary School Reorganisation consultation report records some analysis work undertaken by Mr Roy James. This states¹¹ "there is no significant difference between the standards that smaller schools achieve and those achieved by larger sized schools". Hence Mr James confirmed that there was no educationally based justification of any change in policy by Gwynedd Council when he reported in 2004.
50. The current arrangements in Gwynedd continue to be successful. These benefits are evidenced by the percentage of pupils attaining the Core Subject Indicator (CSI) in each key stage in Gwynedd and Wales in 2006. The Gwynedd attainment reflects the success of the current arrangements. These were:

	Key stage 1	Key stage 2	Key stage 3	Key stage 4
Gwynedd	82.4%	76.5%	60.7%	47%
Wales	80.6%	74.2%	58.2%	40%

51. Nor did Gwynedd Council forecast any deterioration in the standards of attainment when it published its forecasts for educational attainment in 2006, as part of the Gwynedd Single Education Plan. The forecast made in this plan was:

Targets:	2006 Actual	2006-07 Target	2007-08 Target
Percentage of pupils in schools maintained by the LEA achieving the Core Subject Indicator in KS2	76.5	79.5	80.0
Percentage of pupils in schools maintained by the LEA achieving the Core Subject Indicator in KS3	60.7	58.6	60.7
Percentage of pupils in schools maintained by the LEA achieving the Core Subject Indicator in KS4	47.0	52.2	48.0

These laudable attainment levels were anticipated without any change to the structure of primary schools in Gwynedd. Importantly, Gwynedd has never published any figures for what CSI results it expects to achieve between 2009 and 2013 during the period of greatest disruption of Gwynedd primary schools, if its proposed plans were to be implemented. The consultation document simply asserts that "the objective of this plan is to ensure that all Gwynedd's children and young people receive education of the highest possible quality"¹², without providing any specific promises of what the "highest possible" will be after 58 primary schools have been closed!

52. The consultation document "Reorganisation of Primary Schools in Gwynedd for the Educational Benefits of all of our Children" is **viewed by Gwynedd residents as seeking to disrupt** the successful partnership of community and parents. As shown above, education standards in Gwynedd currently are consistently high. However, removing the highly valued link between rural communities and their primary school, reducing parental and community opportunities to support their school, extending the school day for primary school children through adding the travelling time needed to reach other sites, are all viewed by the community as likely to affect children's ability to maintain the current high standards.

¹¹ 3.3.7

¹² 2.4.1



The Small School Closures Proposed Are Not Addressing The Challenge Of Surplus Places.

53. The "School Organisation Proposals - National Assembly for Wales Circular No: 23/02: July 2002" is clear in its advice¹³.

"It is important that funding for education is used cost effectively. Some surplus places are necessary to enable schools to cope with fluctuations in numbers of pupils, but excessive numbers of unused places mean that resources are tied up unproductively. Where there are excessive numbers of surplus places LEAs should review their provision and, where feasible, make proposals for their removal especially where a school has significant levels of surplus places."

54. But Wales Circular No: 23/02: July 2002 also helpfully defines what it considers to be excessive numbers of surplus places. This is defined¹⁴ as:

"Significant surplus is defined as 25% or more of a school's capacity and at least 30 unfilled places; for example a small school with a total capacity of 100 places might have 28 unfilled places but this would not be classed as significant surplus."

Only a small number of rural schools have at least 30 unfilled places.

55. An analysis of the Gwynedd Council Single Education Plan shows that a third of **all** primary schools in Gwynedd have "significant surplus capacity" by the above definition. Just 12 of the 29 sites selected for closure in the plan meet the criteria of "25% or more of a school's capacity being unfilled places with a minimum of 30 unfilled places". Over 20 sites that have "significant surplus capacity" have not been selected for closure. For example, all three voluntary aided schools have "significant surplus capacity" but there is no suggestion that any of them should be closed.
56. Of the 18 "small rural schools" (by any likely definition) that are earmarked for closure, only 9 meet the criteria of 30 unfilled places. The Gwynedd Council Single Education Plan identifies 2,516 surplus capacity in total in all primary schools in Gwynedd, which has a total primary school capacity of 11,862 pupils, i.e. 21.2% nominal surplus capacity. Closure of all 9 rural schools that meet the unfilled places criteria will release a maximum of 508 places assuming that sufficient places can be provided in other schools within a possible travelling distance leaving over 2,000 'surplus' places.
57. The reality of the Gwynedd reorganisation plan is that small schools are proposed to be sacrificed to fill vacant surplus places in larger schools. For example, near Penrhyndeudraeth, Croesor and Y Gareg are proposed to close to fill surplus places in Cefn Coch (Penrhyndeudraeth) school: Morfa Nefyn school is proposed to close to fill surplus places in Nefyn school: near Tywyn, Abergynolwyn and Llwyngwrl schools are proposed to close to fill surplus places at Brynchrug (Tywyn).
58. Schools serving small rural communities appear to be being sacrificed partly to address surplus places in larger schools and partly because site asset disposal (after Lyons) is likely to be easier to achieve and financially more attractive when the sites are located in rural areas.

Lack Of WAG Funding is Not A Justifiable Excuse To Close Schools

59. Sustainability of any public service is achievable if, and only if, the responsible management deploys an appropriate level of managerial competence. The subjects considered in the consultation document "Reorganisation of Primary Schools in Gwynedd for the Educational Benefits of all of our Children" raise serious questions about the level of management skills present in Gwynedd Council.

¹³ 1.9

¹⁴ Footnote 4



60. Fundamental to sustainability is availability of finance. Statements in the consultation document such as “receiving a low level of grant from the Assembly”¹⁵ are simply disingenuous. Gwynedd Council has enjoyed excellent access to financial resources from the Assembly. The consultation document fails to record the fundamental fact that Gwynedd Council has been in receipt of generous central funding settlements since the Assembly was established.
61. In the eleven years since the Assembly became operative the central funding¹⁶ to Gwynedd has increased by 71% in money terms and by 30% in real terms. Gwynedd’s lack of confidence in its ability to maintain a sustainable base for education from the 30% real terms extra money that it has received is a reflection on the level of skills and competence in those who have ‘run’ the Council.

YEAR	CENTRAL GOVT SUPPORT - MONEY TERMS (£000s)	CENTRAL GOVT SUPPORT - REAL TERMS (£000s) Using Treasury GDP deflators
1997-8	95,204	92,498
1998-9	98,925	93,741
1999-00	101,838	94,592
2000-01	107,060	98,047
2001-02	115,591	103,384
2002-03	122,142	105,929
2003-04	133,076	112,161
2004-05	136,288	111,782
2005-06	140,740	113,046
2006-07	153,090	119,536
2007-08	159,150	120,356
2008-09	163,320	120,204

Source: StatsWales (001050) and Welsh Assembly Government

Criteria For Selection Need To Be Measurable And Visible

62. Gwynedd Council produced and published “criteria for sustainability of primary schools” in Gwynedd. The Gwynedd list was a list of sound bytes only, without any benchmarks that Councillors and parents could associate with. The published criteria consisted only of a list of topics that should be considered. No numerate measures which would enable the informed observer to identify whether or not a particular school met the criteria to be an “unsustainable site” or not, was included in the consultation document.
63. The practice deployed by Gwynedd Council was decidedly opaque. Gwynedd Council’s selection process for schools to be reorganised appears to the public to have been a random one.
64. **The Rural Development Sub-Committee’s Inquiry could assist rural areas by recommending** that the Welsh Assembly Government’s criteria for sustainability of primary schools is both strengthened, by including within it definitive measures, and requiring LEAs to include the WAG criteria as a mandatory requirement supplemented as necessary by local ones.

In Any School Reorganisation, The Scale Of Disruption Proposed Should Be Minimal And Timely

¹⁵ 3.10.3

¹⁶ The funding comprises revenue support grant, redistributed non-domestic rates, council tax reduction scheme and transitional grants. It excludes non-police specific grants



65. The scale of the disruption proposed for Gwynedd's primary school children is mind blowing. The consultation document states "The process will need to involve all schools within the County, large and small, rural and urban, as the provision across the entire spectrum requires rationalisation" This assertion is not offered for consultation, nor is it evidence based. It is presented by Gwynedd Council as a dogma!
66. The Council's proposal is to reduce the number of schools in Gwynedd by more than half from 106 to 48 by 2013. This is disruption on a formidable scale that has every potential to damage the education of all Gwynedd children born in the current and next decade.
67. The timing of any proposed change should be carefully selected. The Gwynedd Plan does not take into consideration the valued initiatives being introduced by the Welsh Assembly Government over the next few years to schools in Wales, that if implemented successfully, should improve the education standards of Gwynedd's primary school age children even further.
68. The consultation document does not make any detailed assessment of the impact that the Primary Schools Reorganisation Plan will have on Gwynedd's ability to introduce successfully the revised curriculum for 3 to 19-year-olds in Wales, which is intended to be implemented from September 2008 onwards. The Welsh Assembly Government describes the revised school curriculum as aiming to:
 - focus on the learner
 - ensure that appropriate skills development is woven throughout the curriculum
 - offer reduced subject content with an increased focus on skills
 - focus on continuity and progression 3-19, by building on the Foundation Phase and linking effectively with the 14-19 Learning Pathways programme
 - be flexible
 - support Government policy, including: bilingualism, Curriculum Cymreig/Wales, Europe and the World, equal opportunities, food and fitness, sustainable development and global citizenship, and the world of work and entrepreneurship
 - continue to deliver a distinctive curriculum that is appropriate for Wales.

Gwynedd Council does not explain how the Primary School reorganisation plan would aid this process.

69. During the next few years, the Welsh Assembly Government (WAG) is introducing "a new approach to learning for children from 3-7 years of age known as a 'Foundation Phase'. It will combine what is currently known as the Early Years and Key Stage 1 of the National Curriculum. The Welsh Assembly Government states "The early years of a child's life form the basis for their future development. It is during the early years that we have the opportunity to enhance each child's disposition to learning and to start them on the road to being 'lifelong learners'. The Foundation Phase is a vital part of the journey which is based on learning through play, active involvement, practical activities and enhances creativity, knowledge, skills and understanding."

Gwynedd Council does not explain how the Primary School reorganisation plan would aid this process.

70. Despite some funding problems with new WAG initiatives, it is the WAG initiatives, not a major disruption of the organisation on Gwynedd's primary schools, that offer the potential of benefits that Gwynedd's children should enjoy! The likelihood of the benefits from the Welsh Assembly Government's initiative being delivered to the children of Gwynedd will be severely reduced if the proposed major disruption of Gwynedd primary educational provision takes place on the same timescale. Gwynedd Council appears to wish to undermine its children's education in those crucial formative early years, by proposing to embark upon such an untimely major disruption of Gwynedd's primary education.
71. **The Rural Development Sub-Committee's Inquiry is invited to recommend** that the Welsh Assembly Government strengthen its guidelines to require LEAs to demonstrate in school reorganisation proposals how their reorganisational plans will build upon national educational initiatives to the benefit of our children.



Community Schools Are Recognised As Having Substantial Advantages.

72. In February, 1998, Stephen Byers, an Education Minister in the then new Labour government, released the following statement:

“Closing a village school can be a death-blow to the community,” he said. “We have lost 450 of them since 1983. Today, I am announcing tough new protection for village schools to end this stream of closures. When a school closes, the village loses a vital focus. Children spend longer travelling to other schools. Young families will come under pressure to move elsewhere. School closures can have a knock-on effect on other services, like village shops, setting up a spiral of decline. This is what we want to stop. So we have decided that any proposal by a Local Education Authority to close a rural school will be called in to the Secretary of State for decision”.

“Further, Ministers will have a presumption against closure. And Ministers will have particular regard to the need to provide access to a local school for rural communities”.

73. Ten years later, in February 2008, the ‘Schools Minister in England, Jim Knight MP re-emphasised the value of rural schools by recording¹⁷ in the House of Commons:

- A reconfirmation of the presumption against closing rural schools
- Encouraging Authorities to promote shared governance arrangements
- Providing additional funding to meet the extra costs of primary schools which arise due to sparsity of population
- Encouraging Authorities to remove surplus places by paying particular attention to poorly performing schools in their strategy
- Asking Authorities to recognise that there will be more ‘surplus’ places in rural areas than there should be in urban areas
- The UK Government guidance to remove temporary accommodation from sites and to consolidate or adapt some of the ‘surplus’ accommodation on sites for alternative community use
- That rural schools have been clearly designated under Section 70(3) of the education Act 2005.

We encourage the Inquiry to consider whether a clear statement of this type would assist rural schools in Wales.

¹⁷ The Hansard extract is included as Annex ‘A’ to this submission



FINANCIAL ISSUES

Are Financial Issues Threatening Education Provision In Rural Areas

74. The Gwynedd consultation document "Reorganisation of Primary Schools in Gwynedd", is disingenuous in its statements on financial savings. The document¹⁸ denies that "financial savings were at the heart of the plan" and claims that if they were "the proposals would be very different". Yet the document includes "financial factors" in its principal reasons for reorganisation and claims¹⁹ it "will lead to savings in the region of £1.5m".
75. In 2004 the Lyons Review on Asset Management in the public sector (Towards better management of public sector assets) was published. This triggered a change in emphasis in various public service areas, if not a change of policy. The total value of public sector assets is huge with land and buildings (including schools) accounting for two thirds of it. Since 2004, there has been greater pressure upon public bodies to consider their utilisation of assets as a high priority activity. In our view, the threat this has presented to rural schools has been evidenced by the school reorganisation proposals in Powys and Gwynedd in particular.
76. Powys in their evidence²⁰, stated that, "one of the key issues is that what we have seen is councils taking certain actions and then claiming, as justification, that they have been forced into doing such and such because of pressure from the Welsh Assembly Government to reduce surplus places and so on". In Gwynedd, we have had many similar statements in public consultation meetings. In fact, a leading Gwynedd councillor, Coun Michael Sol Owen, in a letter to the Caernarfon & Denbigh Herald explained that if the Gwynedd plan is not pursued, it would "result in the Welsh Assembly Government stepping in with a far more vigorous agenda resulting in all probability in more school closures".
77. There is written evidence of pressure also from a report published by Estyn and the Welsh Audit Office. In a joint report²¹ they criticised Gwynedd Council because "the progress in taking forward school re-organisation has been too slow". The Estyn/WAO report also records that:

"Gwynedd has recently received information from the Welsh Assembly Government about its likely financial settlement for 2007 – 2008, and beyond. This information will inevitably lead to a reappraisal by the council of the school re-organisation working group's proposals on school organisation."

78. In a letter to us the Minister says "My understanding is that Gwynedd County Council's proposed reorganisation programme is an attempt by the Authority to act to overhaul what it considers to be an unsustainable, ineffective and uneconomic existing school structure". She continues with the assurance "I hope that you can see that it is not the Assembly Government that is driving this change". We naturally accept her assurance, but must then **encourage the Inquiry to investigate where the driving for closing small rural schools is coming from?**

Capital Funding

79. The Gwynedd Primary Schools Reorganisation Proposal document does not include a detailed financial plan nor much financial detail in respect of its proposal. When small schools are closed and the pupils are moved to another site, that site often requires financial investment for improvements to the school hall, playground improvements, school lunch facilities, parking and road safety improvements to accommodate school transport, etc. There is reference in the consultative document to the inevitable need for transitional funding, but this is not detailed and a reference that area schools will require substantial capital, but the source of this funding and the total capital investment required is not identified. Nor is the impact revealed, on other elements of Gwynedd Council's education budget, of seeking to provide such funding. **The Inquiry is encouraged to conclude that rural schools should not be proposed for closure unless the resultant capital works on all affected sites have been identified and the source and availability of funding for these works has been identified**

¹⁸ Appendix 1 5.1

¹⁹ Appendix 1 5.2

²⁰ Transcript of 04/06/2008 Para 29

²¹ Estyn and the Welsh Audit Office Inspection of Gwynedd LEA - Access and School Organisation 2006



80. What is clear is that the actions of Gwynedd and Powys Councils in launching primary school reorganisation plans pre-empt the development of an appropriate policy by WAG. Capital funding is needed to implement school mergers as the Gwynedd report makes clear. It says²², "The intention is to invest £30 million in 8 brand new area schools on new sites." There is no detail presented of the source of the capital funding. The evidence is that it is very difficult to raise capital from PFI or otherwise. The difficulty of raising finance in the 'Partnership for Schools' initiative, raises substantial doubts as the ability to raise the £30 million finance for new primary schools required by Gwynedd to commence its reorganisation. The Inquiry is encouraged to explore this topic.
81. However, the Minister told us in a letter that "on the issue of capital funding, we are hoping to develop new arrangements which will link the allocation of additional capital funding to an authority's track record in planning school places, bringing forward proposals to rationalise provision and having a robust investment programme. This targeted grant funding is likely to be in addition to a continuation of formula based School Building Improvement Grant, although the details are subject to consultation with the WLGA". On 7 February 2008, the Minister gave a speech to the WLGA/SOLACE Planning of Schools Places conference where she made similar comments to those in her letter to us.
82. Did Gwynedd Council act on 'promises' of funding from a "targeted grant funding scheme" that is not yet formally part of WAG policy and of which the details had not been developed when Gwynedd included significant capital funding in its primary school reorganisation proposals? **The Inquiry is encouraged to investigate the link between WAG school capital financing schemes that are additional to formula based School Building Improvement Grant and the impact that this may have on proposals for the future of rural schools.**

Small school safety net funding:

83. The Welsh Assembly Government is alert to the demands of education in rural areas and supports authorities such as Gwynedd and Powys that must provide such rural educational services. In a letter to the Welsh Local Government Association, the Minister for Education, Children and Young People confirmed in August 2007, that the Welsh Assembly Government's 'One Wales' Agreement contains a commitment to funding for small and rural schools continuing. She also described the substantial funding available through ring fenced grants for small and rural schools.
84. In England and Wales, supplementary funding is ring fenced for the benefit of small and rural schools, including in Wales through the use of the "Better Schools Fund". This funding is reserved for qualifying rural schools through safety net formulae. The Gwynedd Primary Schools Reorganisation Proposal states²³ "every school with fewer than 37 pupils received additional funding to ensure that this is possible, at a total cost of £544,000 annually". **The Inquiry is encouraged to compare the size of this ring-fenced sum with the total WAG Central Government support to Gwynedd Council for 2008-09 of £163,320,000 and reflect upon its likely significance.**
85. The Inquiry is encouraged to examine also how the £544,000 annual cost of ring fencing in Gwynedd compares with the grant to Gwynedd from the Better School Fund and other rural funding schemes. The Inquiry may wish to consider whether the £544,000 annual expenditure is a good value for money investment in preserving the cultural heritage of community life in rural Wales?
86. Gwynedd Council criticises its own current performance in terms of making proper provision for schools in areas of deprivation and suggest that this is one reason for the programme of proposed closure of rural schools. Table 6 of the Gwynedd consultation document identifies that currently schools in socially deprived urban wards receive less per capita monetary allocation than the average per capita monetary allocation for the schools in the remainder of the Gwynedd. This failing can be rectified of course by an appropriate modification to the per capita monetary allocation formula. Gwynedd could update its formula: It does not require the closure of significant numbers of schools in rural areas to address this issue.
87. Further issues on safety net funding are discussed after the section on 'Federalisation Of Schools'.

²² Appendix 1 5.4

²³ Appendix 1 5.3



FEDERALISATION OF SCHOOLS

Gwynedd's Flirtation With School Federalisation.

88. The WAG 'School Organisation Proposals - National Assembly for Wales Circular No: 23/02' guidance on consideration of proposals requires the Minister to consider "whether alternatives to closure have been actively considered, in particular whether **federation, clustering or collaboration** with other schools have been looked at (taking account of the scope for use of ICT links between school sites) and the reasons for not pursuing these as an alternative to closure".
89. The Gwynedd Primary Schools Reorganisation Proposal includes a scheme of "federalisation", but does not consider any alternative means of clustering or collaboration.
90. A report has been produced by Mr Gareth Davies Jones, former Her Majesty's Inspector and independent consultant on "The Federal School". In reading Mr Gareth Davies Jones' report the Inquiry should note that he states in his introductory section 1, "It appears that there is a consensus that the current situation is unsustainable and that retaining the status quo is not a logical option". Mr Gareth Davies Jones was not asked to assess the merits of a federalisation scheme with alternatives and **did not recommend federalisation**. In the conclusion to his report, he states, "Whatever system is adopted, certain conditions are central to achieve success; everybody's commitment, a willingness to accept new delivery methods, detailed planning and open communication." In Gwynedd, there is anything but commitment from everybody to federalisation, for good reason.
91. The consultation document provides inadequate information to parents and others on the Gwynedd Council proposed scheme for federalisation of primary schools. In 2000, there were only a dozen such school federations in existence in the UK. Recent research indicates that federalised schools still educate just 1% of primary school children in both England and Wales. The evidential base for their success or failure is currently incomplete. Committing to such a federalised schools approach on a large scale in Gwynedd is a gamble with Gwynedd's children's future!
92. To date, Welsh Assembly Government Ministers have been sufficiently dubious about the applicability of the various federalisation methods to education in Wales, that they have not adopted for use in Wales any of the school federation Statutory Instruments that apply in England. We share the suspicion of federalisation, since, in our view, federalisation would undermine the One Wales Agreement commitment to "support the development of community schools".
93. The Gwynedd consultative document does not define in detail the scheme for federalisation that Gwynedd proposes. Parents are naturally confused as to the proposed nature of federated schools in Gwynedd. The consultation document refers to "federal arrangements". Details in the consultation document, mainly in the Appendix produced by Mr Gareth Davies Jones, indicate that Gwynedd intends to follow an early model for "federating" schools such as that used in Hampshire.
94. The federalisation approach proposed by Gwynedd has no apparent basis in statute in Wales but appears to conform with the following. In the Gwynedd proposal, when a federated school is formed, the schools involved combine to create a single school in law²⁴, with a single formal headteacher (lead headteacher) and a single governing body. Communities that retain outlier school sites will lose their Parent Teacher Associations on those sites, will lose their Governing bodies and lose much of their close community liaison, since all managerial decision will be made by a head teacher who is based on the remote main school site.
95. Federalised schools will initially operate on two or more sites but Gwynedd acknowledges that subsequently the governors may rationalise the 'school estate' by withdrawing facilities from an outlying site without any statutory right for parents or the outlying community to object.
96. Under the Gwynedd variant of a "federated school", all of the schools in the cluster, except perhaps one, must be legally closed during the next few years and before 'federalisation' takes place. The Gwynedd consultation report makes clear that 58 of Gwynedd's primary schools are proposed to be legally closed leaving only 48 schools remaining.

²⁴ A report on Federal Schools by Gareth Davies Jones para 1.3



97. The true impact of the school federation proposals has not been laid out in the consultation document proposal. Although the identity of the particular schools that will be formally closed have been indicated, the preferred location for the prime site on which the headteacher will be in residence has often not been disclosed. Many parents in Gwynedd have not understood that a federated school has a prime site which usually undertakes all the school administration, curriculum development, teacher development and appraisal, children's progress monitoring, community liaison, interfacing with local education authority, premises maintenance, supplies ordering, appointments with parents, liaison with the secondary school etc. Indeed, even since the May election a former Councillor has written to the local press claiming that federalisation leaves all schools as they are.
98. The centralisation of all school management, leadership and administrative activity on one site reduces the requirement for staff on the outlier detached classroom sites. Experience in some established federalised schools that adopted the Hampshire model is that the outlier site often lose at least 0.75 of a WTE teacher from its staffing allocation, or replace a teacher with a classroom assistant. The consultation document contains no clear detail of Gwynedd's plans in regard to staffing allocation.
99. Only in the 'small print' of the Gwynedd Council proposal is it recorded that some of the early federalised schools have been rearranged with key stage one pupils attending on one site and key stage two pupils attending on another. This potentially reduces the number of teachers required for the school at the cost of increase of school transport. Gwynedd's intention in regard to teaching allocations on outlier sites has not been clarified in the consultation document.
100. Also within the type of federalised scheme proposed by Gwynedd Council there is often rationalisation for "nursery" education with three and four year olds being taught on one site only. Again, there is no clear statement of Gwynedd's intentions in this regard either. Similar observations apply to education for special needs children, with the detailed plans for providing such education in Gwynedd is not included in the consultation document.
101. The Gwynedd 'safety net' formula is currently based upon the number of pupils in a school (37 being the watershed). The Gwynedd Council aim is that Federated schools should have 90 pupils or more. Hence under the current formula they would have no financial subsidy to support their outlier detached classrooms. The 'safety net' under the Plan will apply only to school federations with less 37 pupils and **not to school sites** with less than 37 pupils. Gwynedd Council has not made clear that there is a likely safety net funding loss and appropriate staffing and other adjustments will need to be made.

The Alternative Of Co-operation

102. Currently, it is understood that federalised schools would be created by use of a combination of the use of SI 1999/1671 entitled "The Education (School Organisation Proposals) (Wales) Regulations 1999" for closures and The SI 2006/175 (W.26) "The New School (Admissions) (Wales) Regulations 2006" as the framework for establishing a new 'multisite' school.
103. If all 58 schools that have been proposed for closure in Gwynedd appeal to the Welsh Assembly Government Minister against the closure of their school, the workload of handling the appeals will create a major diversion for both Gwynedd Council and the Welsh Assembly Government from their task of providing quality education. The destructive nature of the current likely approach is clear.
104. It is understood that some WAG civil servants have been examining whether arrangements may be made for an SI similar to **one of those** existing in England to be available in Wales. The Inquiry is invited to conclude that whereas such a move may ease the administrative burden for WAG, it is the principle of federalisation which severs links between communities and schools and hence to initiate a debate on whether or not federalisation was appropriate in rural Wales.
105. The alternative to federalisation is clustering or cooperation. Gwynedd has run a clustered school operation for Bodfeurig And Tregarth Schools. A report²⁵ published by Gwynedd Council summarises the benefits which cooperative clustering might provide while emphasising that securing their independent school identity was most important.
106. The Welsh Assembly approved 'the SI 2008/168 (W 21) 'Collaboration Between Maintained Schools (Wales) Regulations 2008' which came into effect in March of 2008. The Inquiry is invited to explore the use of these

²⁵ Visit of Carys Thomas and Alun Puw



regulations (and other related regulation) to encourage collaboration between schools in rural Wales in a manner that does not threaten the independent identity of each school and its relationship with its community.



ANNEX 'A'

RURAL SCHOOLS – PRESUMPTION AGAINST CLOSURE IN ENGLAND

Extract From Hansard - 18 Feb 2008 : Column 216W

Schools: Rural Areas

Mr. Drew: To ask the Secretary of State for Children, Schools and Families how many rural schools he has agreed to close since the presumption against such closure was introduced; which such schools have closed; and on what dates, broken down by local authority. [184992]

Jim Knight: The Secretary of State has not agreed to close any rural school since the presumption against closure of such schools was introduced in 1998. Local authorities are responsible for taking decisions on proposals to close schools, including rural schools. Where there is an appeal against a proposed closure the schools adjudicator makes the decision. Ministers do not have a role in this process.

Bill Wiggin: To ask the Secretary of State for Children, Schools and Families pursuant to the written ministerial statement of 31 January 2008, *Official Report*, column 24WS, on the future of rural schools, and the letter placed in the Library, what estimate he has made of the percentage of rural schools which may need to (a) close and (b) merge; and if he will make a statement. [185024]

Jim Knight: The Department has not made an estimate of the number of rural schools which may need to close or merge. Local authorities are responsible for planning school places in their area and they, or the schools adjudicator, make the decisions about school closures. Both must have regard to statutory guidance which contains a presumption against closing rural schools.

We do not expect local authorities to rush to close rural schools. They should consider other options first such as rationalising school space, for example by removing temporary accommodation, or broadening the services their schools offer in line with the likely future pattern of children's services and the needs of local communities. We also encourage authorities to look at promoting shared governance arrangements between small primary schools as a way of addressing financial and educational challenges resulting from falling primary school rolls.

Bill Wiggin: To ask the Secretary of State for Children, Schools and Families pursuant to the written ministerial statement of 31 January 2008, *Official Report*, column 24WS, on



the future of rural schools, and the letter placed in the Library, how much of the £188 million of funding referred to in the dedicated schools grant 2007-08 for the extra costs of primary schools which arise due to sparsity of population has been allocated to Herefordshire; and if he will make a statement. [185025]

Jim Knight: For the financial year 2007-08 we calculate that £2.87 million of Herefordshire's funding for schools through the Dedicated Schools Grant is for the extra costs of primary schools which arise due to sparsity of population.

Bill Wiggin: To ask the Secretary of State for Children, Schools and Families pursuant to the written ministerial statement of 31 January 2008, *Official*

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Report, column 24WS, on the future of rural schools, and the letter placed in the Library, under what circumstances his Department's policy is that a (a) primary and (b) secondary school should remain open in a rural area when there is in excess of 10 per cent. surplus spaces; and if he will make a statement. [185026]

Jim Knight: The Department's policy is that it is for local authorities to plan school provision in their area and to develop strategies for removing high levels of surplus places, where they exist, with particular attention to poorly performing schools.

We accept that in order to preserve access for young children there may be more empty places in rural areas than in urban areas. In preparing their plans authorities must take into account the presumption against closing rural schools contained in statutory guidance. Reducing surplus places need not mean school closures. It can also be achieved by removing temporary accommodation, or consolidating, or adapting accommodation for alternative community use, or federating groups of schools together.

Mr. Laws: To ask the Secretary of State for Children, Schools and Families which rural schools are (a) on and (b) not on the list of rural schools for which there is a presumption against closure; and if he will make a statement. [185330]

Jim Knight: The presumption against closure applies to all rural schools. Rural primary schools are designated by the Secretary of State under the provisions of Section 70(3) of the Education Act 2005. There is no designation process for rural secondary schools. The rural classification is based on the Office of National Statistics rural indicator.

A copy of the list of rural primary schools has been placed in the Library. The list is also available on

<http://www.dfes.gov.uk/publications/otherdocs.shtml>.



Mr. Laws: To ask the Secretary of State for Children, Schools and Families when his Department drew up the list of rural schools for which there is a presumption against closure, with reference to his letter of 31 January 2008 to Directors of Children's Services in England. [185331]

Jim Knight: The order designating the list of rural primary schools to which the presumption against closure applies under Section 70(3) of the Education Act 2005 came into force on 16 March 2007.