

Appendix C

RHONDDA CYNON TAF COUNCIL

EQUALITY IMPACT ASSESSMENT QUESTIONNAIRE

EQUALITY IMPACT ASSESSMENT QUESTIONNAIRE

Directorate: Education
Service Area: 21st Century Schools
Responsible officer: Lisa Howell
Date: Updated 1st of July 2019

This Equality Impact Assessment is written in association with the Community Impact Assessment, the Welsh Language Impact Assessment and also in conjunction with the information as detailed within the associated Consultation Document published in October 2018, the Consultation Report published in March 2019, and the Objection Report which will be published within 7 days of a decision on the proposals being taken.

1. Name of project: Reorganisation of School Provision in the Pontypridd and Hawthorn areas

The Project is to:

- Develop post 16 centres of excellence based at Bryncelynog Comprehensive School, Beddau and Coleg y Cymoedd, Nantgarw.
- Create two new 3-16 schools, in Pontypridd and Hawthorn, which will take a radically different approach to education in the areas, by sharing both primary and secondary sector resources;
- Improve and increase Welsh medium primary provision by closing Heol y Celyn Primary School, which is a dual language school, and YGG Pont Sion Norton; Welsh Medium learners attending both schools will transfer to a new, Welsh medium school, that will be constructed on the former site of Heol y Celyn;
- Amend the catchment areas of Pontypridd High and Hawthorn High to better meet and match the demand for school places;
- Improve the learning environments for learners with additional learning needs (ALN).

To achieve these changes, the Council, in partnership with Welsh Government, will invest £37.4m in building new or refurbishing/remodelling existing buildings to ensure the learners have a high quality, viable and sustainable 21st Century learning environment.

To achieve this, the proposal is to:

- Close the sixth forms of Hawthorn High School, Pontypridd High School and Cardinal Newman RC Comprehensive School and transfer the post-16 provision to Bryncelynnog Comprehensive School or Coleg y Cymoedd, Nantgarw. For those students who opt for a Roman Catholic education, sixth form provision will be available at St David's College, Cardiff;
- Close Pontypridd High School and Cilfynydd Primary School and create a new 3-16 'all through' school on the site of the current Pontypridd High School;
- Close Hawthorn High School, Hawthorn Primary School and Heol-Y-Celyn Primary School and create a new 3-16 'all through' school on the site of the current Hawthorn High and Hawthorn Primary Schools. The local authority designated ALN specialist class located Hawthorn High School will also transfer to the new school.
- Close Ysgol Gynradd Gymraeg Pont Sion Norton and open a new Welsh medium primary school to be constructed on the site of the current Heol-Y-Celyn Primary School. The learners educated through the Welsh medium at Heol-Y-Celyn will transfer to the new school and the Heol-Y-Celyn learners educated through the English Medium will transfer to the new 3 – 16 school at Hawthorn (see above);
- Amend the catchment areas for learners aged 11-16 of two of the LA maintained secondary schools by:
 - Transferring the Graig area of Pontypridd (that is part of the catchment area of Maesycod Primary School) to the new 3-16 school for Pontypridd (currently part of the Hawthorn High School catchment)
 - Transferring the catchment area of Coedpenmaen Primary School to the new 3-16 school for Pontypridd (currently part of the Hawthorn High School catchment)

2. Proposal Aims. Consider why the proposal is needed? What does the Council hope to achieve by it?
How will the Council ensure it works as intended?

Detailed information of the aims of the proposal is included within the Consultation Document to reorganise primary schools, secondary schools and sixth form provision in the greater Pontypridd area, which was published in October 2018. This has been widely circulated to all consultees and is still available to view online on the Council's website.

In recent years, Estyn has sharpened its approach to inspection of schools and local authorities and has raised the bar in respect of what it considers to be good and excellent provision. Furthermore, Estyn has taken a very hard line on local authorities in Wales that have weaknesses in key areas such as corporate governance, educational standards, financial management, attendance levels, surplus places and safeguarding.

Following the last formal inspection of Rhondda Cynon Taf's Education Service in 2012, Estyn also highlighted that the Council had the highest number of surplus places in Wales and that action had to be taken to address this issue. This was followed up by a letter from the Welsh Government Minister for Education and Skills in November 2012 that instructed the Council to take action in respect of surplus places or the Welsh Government would take responsibility for removing the surplus places.

The Elected Members accepted Estyn's recommendations and have been continually reviewing school provision in Rhondda Cynon Taf ever since. The criteria that has been used for selecting schools for review is one or more of the following:

- Surplus places in excess of 25% of published capacity;
- Buildings that are beyond economic repair/not fit for purpose;
- Financially unviable (usually due to a sharp fall in pupil numbers);
- Schools considered to be 'small' schools, i.e. schools with 90 or fewer learners;
- Separate infant and junior schools in close proximity;
- 'Paired' schools, i.e. where children progress from one of the schools to the other;
- Mixed aged classes where there are more than two age groups in one class;
- Schools considered to be at risk, based on their academic Key Stage data and the quality of the leadership, or meeting Estyn's criteria as a school in need of significant improvement or special measures.

Consideration for these proposals has been aligned with the 21st Century Schools and Education Programme's long term strategic investment in the education estate throughout Wales. The priorities for this investment are:

- Addressing growth in demand for Welsh medium education;
- Reducing surplus capacity and inefficiency in the system;
- Expansion of schools in areas of increased demand for educational services;

- Addressing condition of educational assets;
- Making assets available for community use where demand exists, to optimise the infrastructure and resources for public services;
- Addressing specific demand for places in faith based provision.

The primary schools and secondary schools included within these proposals have been assessed against the aforementioned criteria:

- 3 of the 5 schools have surplus places in excess of 25%;
- The combined maintenance backlog of the schools is over £4M;
- Key Stage 4 outcomes:
 - The educational performance of Pontypridd High for L2+ from 2016-18 has been below the all Wales average for 2 out of the last 3 years and above the RCT average for all 3 years.
 - The educational performance of Hawthorn High Level 2+ from 2016-18 has been below the all Wales and RCT average for 2 out of the last 3 years.
 - The educational performance at both Bryncelynnog and Cardinal Newman for L2+ outcomes have been above both the local and national averages for the last 3 years 2016-18.
- Key Stage 5 outcomes:
 - The percentage of learners achieving 3A* - C grades in Hawthorn High School was below both local and national averages for 3 out of the 4 years from 2015-18, with significant improvement made in 2018.
 - In Pontypridd High School the percentage of learners achieving 3A* - C grades was below both local and national averages from 2015-18.
 - Outcomes for the same measures were more variable in Cardinal Newman RC School over the same 4 year period.
 - In Bryncelynnog Comprehensive School the outcomes for 3A*-C were above the local and national averages for 3 out of 4 years from 2015-18.

The sixth form pupil retention rates at the 4 secondary schools that are included within the proposals are low, as are the post-16 pupil projections. However, cumulatively they will provide the numbers needed to deliver a sustainable and viable sixth form. Deteriorating pupil numbers and the consequent reduction in post 16 funding from the Welsh Government has resulted in Cardinal Newman School, Pontypridd High School and Hawthorn High School having cumulative deficit budgets of circa £1.5M.

The opportunity exists to reconfigure the primary and secondary schools, including post 16 provision, to create educationally and financially viable schools that serve the local communities. These proposals seek to achieve this.

Educational Considerations

School organisational change should point to the educational benefits that any change will offer, particularly in relation to overall improvements in standards, but also in terms of the social and emotional development of children and young people, which would usually impact beneficially on their overall achievement and outcomes.

It is the Council's view that creating larger sixth forms and 3-16 schools will:

- **Improve educational outcomes;**
 - Create larger school departments or faculties that will promote the sharing of skills and expertise across more viable teams;
 - Provide teaching and support staff with more opportunity to develop professionally;
 - Enable greater opportunities for staff to move between key phases/stages and further develop expertise;
 - Provide a more appropriate skills-based curriculum and wider extra-curricular opportunities which should improve attendance and educational outcomes;
 - Improve transition.

- **Improve educational provision;**
 - Provide the conditions that will enable a broader and more diverse curriculum to be developed to better meet the needs of the school's young people and in ways that will be viable and sustainable over the longer term;
 - Improve the range and quality of facilities, technology and learning resources available to the benefit of all learners;
 - Enable greater continuity in teaching and learning, and in the levels of support provided for vulnerable groups of learners;
 - Allow for the potential for financial savings in terms of staffing structures and the purchase of services, which accrue in a larger school;

- Broaden the range of extra-curricular and out-of-school activities and develop them in ways that are sustainable over the longer term;
 - Deliver the future capital investment benefits that would arise from the modernisation of a small number of institutions rather than many;
 - Create schools of a sustainable size for their catchment area by removing surplus capacity, providing greater educational and financial stability;
 - Release resources that will be reinvested in improving the buildings and in improving standards of teaching and learning, which otherwise would not have been available;
 - Enable schools to build better relationships with parents and carers over time.
- **Improve leadership and management;**
 - Provides the opportunity for the headteacher to distribute key leadership tasks such as child protection, literacy, numeracy, additional learning needs, wellbeing and attendance etc to a greater number of staff. Often in a small primary school, the headteacher takes responsibility for the vast majority of these tasks;
 - Creates leadership opportunities for other staff, and for others to specialise in key areas, which will enhance educational provision and outcomes, and improve succession planning;
 - Allow teaching and support staff access to a wider range of responsibilities:
 - Improved career prospects;
 - Improved curriculum co-ordination;
 - The opportunity to teach across a wider age range;
 - An increased range of expertise;
 - Improved opportunities for staff interaction and collaboration.

These benefits apply equally to mainstream learners and learners with additional learning needs (ALN). This argument is supported by Estyn in its report “School Size and Educational Effectiveness” (Dec 2013), which stated:

- *“Pupils’ standards are good or better in a higher proportion of large primary schools than small and medium-sized primary schools. This may be because large schools tend to have more expertise and capacity to address the needs of more vulnerable pupils and the more able and talented pupils.”*

- *“Examination results for large secondary schools are better than those for small and medium-sized secondary schools for nearly all measures”;*
- *“In general, curriculum provision is broader and better balanced in large secondary schools. Nearly all large secondary schools provide good or better learning experiences for their pupils. Large secondary schools are able to offer a wider range of options due to economies of scale”.*

What is the educational case for creating larger sixth forms?

Over the past few years secondary schools have sought to collaborate to meet the requirements of the Learning and Skills Measure 2009 and to offer a good quality post 16 learning experience to their learners. Despite the best efforts of the headteachers, schools and the Council:

- There are too many small sixth forms and a rationalisation would better meet the educational needs of learners by strengthening management arrangements, improving the effective and efficient use of resources, and better ensuring a quality educational experience. The percentage of learners opting to stay on in their respective school for a sixth form education in September 2018, was very low. This ranged from 32-36% in Cardinal Newman, Pontypridd and Hawthorn High Schools and 44% in Bryncelynog. A viable sixth form, both educationally and financially should, ideally, have at least 250 students. In January 2019 (source: PLASC return), Hawthorn High School had 83 sixth form learners attending, Pontypridd High 101, and Cardinal Newman 71, totalling 255 between the three schools. Bryncelynog Comprehensive had 144 sixth form learners at the same point in time.
- The delivery of post-16 education is inefficient and for many the educational experience could be considerably better and outcomes improved. There is still unnecessary post 16 duplication of provision between schools and colleges, choice for many learners is restricted, class sizes are too small, and secondary school surplus places in the County Borough are projected to be almost 3,500 by 2022, and over 785 in the greater Pontypridd area alone. In order to sustain post 16 education in schools with low retention rates, valuable education funds are being directed at additional staff costs and infrastructure when they would be better directed at the learners and the learner experience. Currently, across Rhondda Cynon Taf, funds amounting to over £600 per pupil that were originally provided to educate 11-16 pupils are redirected at sixth form learners, to subsidise loss making courses due to small class sizes. This amount increases to an average of £700 per pupil across both Hawthorn and Pontypridd High Schools; at Cardinal Newman this figure is almost £800.

- Small class sizes found in many sixth forms leads to limited learner interactions, which diminishes the effectiveness of learning. Poor collaborative learning experiences for learners and the restricted choice of subjects available in schools with low retention rates is adversely impacting on the quality of post 16 education. Where providers have made the greatest progress in collaborating across schools to reduce inefficiencies and improve effectiveness, learner opportunities and interactions have increased. However, travel between providers is seen by some learners as a barrier to accessing a wider choice of courses and continuity in teaching in learning.
- Choice is often dependent upon learner postal code and budget deficits suggest that consortia arrangements are not having the desired impact. There are no equitable post 16 options entitlement for learners in the County Borough and the proposals offer an opportunity to improve choice and the quality of learner experience and engagement.

Creating a larger sixth form at Bryncelynnog, together with the existing comprehensive post 16 provision at Coleg y Cymoedd creates the capacity and economies of scale to be able to improve:

- **Standards and Achievement** – raising standards of success and achievement and increasing rates of progression to Higher Education and employment.
- **Choice** – improving the breadth and depth of curriculum on offer creating greater choice for all young people so that they can choose learning pathways that best enable them to mix and match vocational, academic and occupational qualifications and experience.
- **Participation** – increasing participation and engagement due to the right curriculum offer
- **Equality** – to ensure every sixth form student in the Pontypridd area is able to access the curriculum of choice and a range of educational pathways suitable to their individual needs.
- **Ability to respond to future learners, community and business needs** – improving qualifications and employability, and re-skilling and up-skilling the population of Rhondda Cynon Taf as the commercial environment changes, thus allowing people to compete effectively in the job market.
- **Financial viability and effectiveness** – providing a cost effective and efficient model for delivery, removing unnecessary duplication, aligning capacity with demand (in light of demographic change), generating economies of scale and expanding economies of scope. This will result in the removal of surplus places, the reduction in the number of small sixth form classes, budget deficits and the duplication of provision between providers.

What is the educational case for creating 3-16 schools?

The great strength of all-through education is the continuity of educational experience which negates the transition “dips” in pupil performance. A 3-16 school provides the opportunity to provide a “bridge” between key stages in order to create a seamless transition for learners in terms of curriculum planning and the quality of teaching and learning. In addition, it can allow for a significant sharing of subject expertise and primary pedagogy, in particular across key stages 2 and 3.

In 2012, the Council established a new 3-19 school at Ysgol Llanhari and to date the school is making good progress. The cross phase learning and communication with staff is having a positive effect on learners. The all through school eases the transition process between the key stages and staff and teachers know the children and families and carers well as they progress through the year groups. This enables them to assist learners where additional support is required. The School has strong leadership, which creates a shared vision that resonates with all phases, all staff are fully engaged and the school benefits from ‘coherence and continuity’ which assists learners learning progression.

In September 2018, a further 3 all-through schools were established in the Rhondda, two 3-16 schools and a 3-19 school, and in September 2019 a further 3-19 school will be established.

Another important benefit of all-through schooling is being able to achieve greater effectiveness through the sharing of resources, and being able to target these resources, whether financial, physical or human, at key areas of school improvement. Some reported benefits include:

- Enhanced opportunities for specialist teaching and roles across school phases/stages;
- Access for primary phase learners to the specialist facilities of secondary phase;
- Providing scope for acceleration programmes for more able and talented learners;
- Enhanced opportunities for providing a robust and graduated response for learners with additional learning needs;
- Joint professional development opportunities and learning;
- Directing resources at early intervention and prevention;
- Planning a seamless curriculum and opportunities for ensuring continuity in teaching and learning;
- Sharing equipment, hardware and accommodation;
- Increasing the range and capacity for extra-curricular/after school learning;

- Creating common administrative appointments.

What will be the impact on the other “partner” primary schools in the community?

Other partner/associated primary schools in each community will also benefit from the proposal. Pupil transition is important and the Council through its 21st Century Band A programme, has instigated some innovative programmes to ensure the quality of transition and integration into Year 7 is seamless regardless of where learners have received their primary education. No pupil will be disadvantaged when they join the new school at Year 7 and opportunities for strengthening cluster arrangements have been adopted in the clusters of the new all-through schools through the development of leadership programmes and the development of transition programmes.

What is the likely impact of the proposals on school pupils?

In making the proposed changes, many things will be different for the learners from the Pontypridd area, depending on parents exercising their right of choice, but some things will remain the same. Possible differences could include

- Some may have a longer or a different route to school, and some may be transported to school by bus. Some children may lose their entitlement to free transport, but others could gain entitlement;
- Some learners who travel to school by home to school transport might have difficulties in accessing activities before and after school hours, although this would clearly be a potential issue for all learners accessing home to school transport;
- Some vulnerable learners (e.g. learners with ALN, mental health needs, young carers, children looked after etc) might experience difficulties in adapting to home to school transport and/or to a new school or college environment;
- Some learners from RCT and neighbouring authorities will have to travel to Cardiff for faith based education;
- For sixth form students, there will be less travelling during the school day to access the curriculum and therefore there will be greater opportunities for more unstructured/informal interaction between learners and teachers during the school day. The time saved from not travelling to other schools during the school day to access post 16 consortia arrangements can also be used to focus on independent study or completing course work;
- Being in classes with predominantly their own age group, the teacher will be better able to offer primary learners with a wider and more varied curriculum to support the needs of a range of learners, including the most vulnerable;

- There will be more collaborative learning opportunities and access to good peer models to enhance learning and mentoring;
- There will be increased opportunities for establishing extracurricular activities and teams within larger schools due to enhanced staffing and improved facilities;
- The teachers and teaching assistants may be different, however, the majority of teachers and teaching assistants should be able to transfer between the schools, if they wish to do so; and
- Strengthened community links and access to improve sporting and recreational areas.

The Welsh Government and the Council has adopted the UN Convention on the Rights of the Child which is expressed in seven core aims that all children and young people:

1. have a flying start in life;
2. have a comprehensive range of education and learning opportunities;
3. enjoy the best possible health and are free from abuse, victimisation and exploitation;
4. have access to play, leisure, sporting and cultural activities;
5. are listened to, treated with respect, and have their race and cultural identity recognised;
6. have a safe home and a community which supports physical and emotional wellbeing;
7. are not disadvantaged by poverty.

We consider that this proposal benefits the children in the communities of the Pontypridd and Hawthorn High School in accordance with the seven core aims set out above.

In addition, we consider that these proposals, contribute positively to Rhondda Cynon Taf's well-being agenda as well as each of the 7 goals of the Well-being of Future Generation Act Wales 2015:

1. A prosperous Wales
2. A resilient Wales
3. A healthier Wales
4. A more equal Wales
5. A Wales of cohesive communities
6. A Wales of vibrant culture and thriving Welsh language

7. A globally responsible Wales

In addition, an assessment of the proposals on The Well-being of Future Generations Act's five ways of working is detailed as follows:

<p><u>Long Term</u> (The importance of balancing short term needs with the need to safeguard the ability to also meet long term needs)</p>	<p>How does your project / activity balance short-term need with the long-term and planning for the future?</p> <p>Maintaining the existing educational premises within Rhondda Cynon Taf places enormous strain on Council resources. It is recognised that there is an opportunity through the 21st Century Schools funding to manage these pressures more efficiently and effectively in future years.</p> <p>The long term vision for RCT is to provide all learners with the best opportunity possible to achieve their full potential through the means of education by providing access to the very best learning opportunities with modern, flexible facilities appropriate for delivering the new curriculum.</p> <p>Improved learning environments will act as a stimulus to creating a better future through delivering brand new 21st Century Schools facilities for our young learners through all phases of their educational journeys from foundation phase through to delivering a more efficient and effective post-16 provision.</p>
<p><u>Prevention</u> (How acting to prevent problems occurring or getting worse may help public bodies meet their objectives)</p>	<p>How does your project / activity put resources into preventing problems occurring or getting worse?</p> <p>The Council recognises the challenges of providing everyone with the facilities and opportunities to receive an excellent education in accessible 21st Century facilities. These proposals aim to enhance and improve the educational environment for all 3-19 year olds affected, and create enhanced opportunities for the development of more specialist roles and strengthen the graduated responses for learners with additional learning needs. The post 16 proposals will ensure that resources intended for key stage 3 and 4 learners will be redirected to enhance the quality of provision.</p>

<p><u>Integration</u> (Considering how the public body's well-being objectives may impact upon each of the wellbeing goals, on their objectives, or on the objectives of other public bodies)</p>	<p>How does your project / activity deliver economic, social, environmental and cultural outcomes together?</p> <p>The Council recognises the importance of the Welsh language as a vital element to achieve and reinforce social and cultural benefits. These proposals will deliver more Welsh medium places in the Pontypridd area, opportunities for wider community collaboration and participation, more sustainable educational buildings meeting BREEAM targets all providing a more integrated and improved learning experience.</p>
<p><u>Collaboration</u> (Acting in collaboration with any other person (or different parts of the body itself) that could help the body meet its well-being objectives)</p>	<p>How does your project / activity involve working together with partners (internal and external) to deliver well-being objectives?</p> <p>As a part of this school organisation programme the Council has already consulted with thousands of learners, staff, parents and carers, throughout the Pontypridd area. If these proposals are to go ahead then this collaboration will continue when further consultation will be undertaken to ensure that all stakeholders and partners have an opportunity to shape the 21st Century Schools provision to ensure benefits and well-being opportunities are maximised.</p>
<p><u>Involvement</u> (The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves)</p>	<p>How does your project / facility involve stakeholders with an interest in achieving the well-being goals? How do those stakeholders reflect the diversity of the area?</p> <p>Consultation meetings were held with the student councils of all of the schools directly affected by the proposals, as well as with staff and governors, and open evenings were held in various locations throughout the area which were open to the public. All comments that were submitted during the consultation process were considered by Cabinet.</p> <p>Moving forward, engagement with learners, staff and RCT residents will continue and input and information gleaned from these sessions will shape the new school facilities. In addition, information gathered will influence and inform our future projects so all consultation undertaken shapes the legacy of the 21st Century Schools Programme.</p>

Benefits of a new school building for YGG, Pont Sion Norton

To comply with Welsh Government guidance and its initiative to create a million Welsh speakers by 2050, which includes an expectation on local authorities to promote Welsh Medium education, the Council is reviewing its Welsh Medium school provision. This will ensure that evidenced demand for places is met and that wherever possible, provision is expanded and improved to encourage parents to select a Welsh Medium education for their children. The proposal to close YGG Pont Sion Norton and construct a brand new, purpose built school, with additional pupil capacity is one of the schemes being planned to assist in achieving this aim.

All local authorities in Wales now have to produce a Welsh in Education Strategic Plan (WESP). This document indicates how the local authority intends to promote the teaching of the Welsh Language, how it intends working towards increasing the number of children taught through the medium of Welsh and how it can assist achieving the Welsh Government's target of having one million people in Wales speaking Welsh by 2050. The WESP for RCT can be viewed and downloaded from the Council website via this link

<https://www.rctcbc.gov.uk/EN/Council/WelshServices/Relateddocs/WelshinEducationStrategicPlan201720.pdf>.

Included among the list of actions and outcomes the Council will undertake to help achieve the targets set out in the WESP, by increasing the number of seven year-old children being taught through the medium of Welsh are the following:

- New and improved school buildings with appropriate capacity levels to fully meet forecasted demand for WM provision in their catchment areas
- Consideration of making dual language Primary schools in to full WM schools

This part of the overall proposal, which is to close YGG Pont Sion Norton and build a brand new school, constructed to 21st Century Schools standards and with an increased capacity of 480 pupils plus Nursery provision, will work towards achieving these targets in this area of the County Borough.

Following the recent consultation on the Welsh Government's draft Welsh in Education Strategic Plans Regulations (Wales) 2019 guidance which advocates an increase in Welsh medium education provision for all learners, including those with ALN, and in accordance with the ALN and Education Tribunal (Wales) Act 2018, RCT will seek future approval to consult on establishing a Welsh medium Foundation Phase and Key Stage 2 ALN provision in the new school.

What is the likely impact of the proposal on the staff of the schools?

As previously stated, all schools involved in the proposal in the Pontypridd and Hawthorn area will close and new schools will be opened with a new governing body. These include the new Welsh medium primary school, and both 3-16 schools. Should the proposal proceed, all the proposed new schools will need to appoint temporary governing bodies for the interim period until the new schools open. These temporary governing bodies will be responsible for establishing the school, agreeing new staff structures and undertaking the appointment process for all of the staffing posts.

The temporary governing bodies will firstly need to appoint new headteachers, who will then formulate and propose the leadership, management and staffing structures for the new schools. The staffing structures for the Hawthorn and Pontypridd 3-16 schools will need to be developed for the schools taking into account a number of factors, including delivering a curriculum without sixth form provision.

The Council recommends that if the proposal is accepted that the temporary governing bodies of new schools “ring fence” the appointment process for all teaching and associated staff posts to staff within the existing schools in the first instance.

No changes will be required to the governing body of Cardinal Newman, but a revision to their staffing structure will be required due to the loss of the sixth form provision.

The Council has well established Human Resource policies and procedures that give reassurance to staff and employers about the management of organisational change, as illustrated by the recent school organisation changes in the Rhondda and Aberdare areas.

3. Who does it apply to? Please indicate by highlighting or deleting as appropriate

Members of the public

School Staff

Children and young people aged 3-19 years in the Greater Pontypridd area

Parents and carers of the children living in the Greater Pontypridd area.

4. Indicate whether this is a new proposal, a review or a proposed cessation: All 3

5. Identifying Impacts – Please choose whether the proposals will have a positive, negative or neutral effect on **each** issue below:

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
Age (young and old)				<p>Improved learning facilities and environments for all, including:</p> <p>P - Creation of viable, sustainable and efficient schools well equipped to deliver a broad and balanced curriculum for all</p> <p>P - A state of the art new build fit for the 21st Century and designed with a focus on the diverse needs of learners, the new curriculum and the successful inclusion of all learners.</p> <p>P - Excellent school facilities that offer a positive pupil learning experience that benefits from access to the latest technology, and modern specialist facilities.</p> <p>P – Access to 21st Century facilities that promote life-long learning opportunities that aim to enable all learners to reach their potential.</p> <p>P- Provision of safe and secure learning environments for all learners.</p> <p>P – Modern and stimulating learning environments that are accessible to all.</p> <p>P - Primary learners will have access to specialist facilities on their own school site.</p>

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				<p>P - Secondary learners have potential access to on-site work experience and volunteering opportunities and involvement in buddying and mentoring schemes.</p> <p>P – Due to economies of scale, enhanced access to specialist roles/ support to improve the lives of children, young and their families/carers.</p> <p>P - Improved facilities that will enable learners to access enhanced extra-curricular opportunities and cultural activities which can help develop relationships within communities.</p> <p>P - Improved transition between the primary and secondary school sectors.</p> <p>P – strengthened cluster arrangements to ensure consistency of approaches across settings and robust transition approaches</p> <p>Ne – Some vulnerable learners might become unsettled about a change in educational environment/transport arrangements.</p> <p>P – Access to more independent learning opportunities and facilities for post-16 learners thus improving outcomes, enhancing preparation for higher education and employment, and reducing the risks of learners becoming NEET.</p> <p>P - Larger sixth forms will reduce the need for consortia</p>

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				<p>arrangements and travelling between sites during the school day thereby maximising opportunities for independent learning</p> <p>P – Enhanced learning pathways and subject choice at post 16 which will improve engagement and the higher education and employment prospects of all learners.</p> <p>P - Improved life chances for young people by providing an appropriate range of relevant courses and qualifications, including more vocational learning routes where appropriate</p> <p>P – Increased participation in learning for learners beyond statutory school age</p> <p>P – More opportunities for community learning, participation and engagement supporting the health and well-being agenda. Further information can be found on page 37, 63 and 64 of the Objection Report.</p> <p>P – Attractive career opportunities for high quality leaders and teachers</p> <p>Ne – Despite robust management of change processes, change may impact on staff morale in the short-term</p> <p>P – a new 21st Century School will impact positively on staff and</p>

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				<p>learner wellbeing</p> <p>Ne – Some staff that enjoy teaching to A level may not wish to remain in a 3-16 school</p> <p>Ne - Increased travel distances for some primary school learners and some sixth form learners</p> <p>Ne - Increased travel distances for some parents and carers, including pedestrian and vehicular travel.</p> <p>P – generous home to school transport policy</p> <p>Neu - Environmental issues in relation to pollution levels around the A470. Further information can be found on pages 18-19 of the Consultation Report.</p>
Disability (remember to consider the different types of disability)	Yes			<p>New build and refurbished school facilities will be fully compliant with the Equality Act (2010) and will be fully accessible to all users; including learners, families and carers with ALN. This will promote positive inclusion opportunities for learners with a range of disabilities. Refurbished and remodelled premises will have reasonable adjustments undertaken to make the buildings as accessible as possible.</p> <p>The design stage will involve input from a range of partners to</p>

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				<p>ensure that new or refurbished buildings will meet the needs of learners with wide ranging needs including, learning disabilities, sensory needs, autistic spectrum disorders, physical/medical and mental health needs. A robust evaluation of Band A developments will inform the planning of Band B developments to ensure that these are future proof and fit for purpose.</p> <p>Larger school premises and staffing structures have inevitable economies of scale and scope for enhancing the number of specialist and supportive posts to meet the needs of vulnerable learners and families.</p> <p>Hawthorn High School will have an established key stage 3 and 4 learning support class provision. Consideration will also be given to developing some post 16 independent study or quiet space for learners with ALN in the new post 16 centre of excellence in Bryncelynnog School.</p> <p>There is also an intention to seek future approval to consult on proposals to establish Welsh medium ALN provision in the new Welsh medium school, if approved.</p>
Gender			Yes	<p>New schools for 11-16 and 11-19 year olds will have access to some gender neutral toilet/changing facilities and the same consideration will be given in schools where the toilets/changing are in need of remodelling/refurbishment.</p>
Gender Reassignment			Yes	<p>If the proposals proceed, the privacy of changing and toilet facilities will be considered at the design stage in full consultation</p>

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				with pupils and staff.
Race			Yes	The proposals will not have a differential impact upon one particular ethnic group as all school settings would be available to all.
Religion or Belief		Yes		<p>Ne - Learners attending the sixth form provision at Cardinal Newman RC Comprehensive school will have to travel to St David's College, Cardiff, if they wish to receive post 16 education through the Catholic faith. To mitigate this potentially negative impact, free transportation will be provided for learners resident in RCT; learners who reside in other County Boroughs will need to check their entitlement with their home local authority.</p> <p>Further information on this can be found in the Consultation Document pages 8-11 and in the Objection Report pages 14-25.</p> <p>The senior management in all schools will be required to manage needs and any significant change in diversity in terms of religion or beliefs as a result of the implementation of the proposals.</p>
Sexual Orientation			Yes	Neu - The schools will admit all pupils, irrespective of sexual orientation. The Council's procedure for managing staffing changes arising from reorganisation, will be robustly informed by management of change and equal opportunity policies and practices.
Welsh Language	Yes			P - A new Welsh Medium school, built to 21 st Century Schools standards, with additional capacity provided to allow more choice for parents as to which language medium they can choose for their children.

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why? P – Positive Ne – Negative Neu- Neutral
	Positive	Negative	Neutral (No impact)	
				<p>The proposals provide enhanced capacity for accessing Welsh medium education and are likely to result in an increase in the number of learners accessing Welsh medium provision. If proposals are approved, consideration will also be given to consulting on proposals to establish Welsh medium foundation phase and KS2 learning support class provision in the new school. The proposals are also likely to increase the opportunities for childcare facilities to support working families – including early years, breakfast and after school clubs.</p> <p>Further information on this can be found in the Consultation Document pages 20-22 and in the Objection Report pages 37-64.</p> <p>All signage will be bi-lingual and consideration will also be given to the needs of learners with specific types of ALN e.g. sensory, medical or physical needs.</p>
Carers		Yes		Ne - Increased travel distances for some parents and carers.

EVIDENCE

6. What evidence is there to support your conclusions? Please indicate below

Reports of the Director of Education to Cabinet - October 2018.
Public Consultation Document on the Proposal – October 2018
Public Consultation Report on the Proposal – March 2019

7. In areas where a negative impact has been identified are there any ways that the negative effect could be reduced or removed? Please indicate below and include the evidence on which you have based your conclusion.

The principal change will be an improvement in the quality of the educational provision, and this should have a significant impact on educational performance of all learners, irrespective of gender, ethnicity or disability. To reiterate, these proposals are not seen as being detrimental to any particular group of learners, they are intended to improve educational provision for all as learners as if agreed, they will access stimulating, modern and fully accessible 21st Century learning environments. The requirements of the ALN and Educational Tribunal (2018) Act and existing SEN legislation will be met to ensure that appropriate provision will be put in place to meet a wide range of learner needs. This will be achieved through effective early intervention and preventative approaches and robust person centred plans and bespoke provision where appropriate. For those learners who may not cope well with the change in their educational environment, strengthened transitional approaches will be adopted in line with person centred planning principles and current SEN legislation. For learners with significant ALN, this would include access to Individual Education Plans, Pastoral Support Plans or increasingly, as the ALNET Act is implemented, Individual Development Plans. Provision, support and intervention strategies will be put in place for vulnerable learners who require support to meet their identified needs. This should be funded from Individual School Budgets or delegated Additional Needs Funding as appropriate. Further information on issues relating to this can be found in the Objection Report on pages 14, 26, 29 and 33.

For learners with other needs or vulnerabilities e.g. children or young people who are carers or looked after, then a robust multi-agency approach will need to be adopted to meet their needs. Data suggests that there a significant proportions of learners who are currently high on vulnerability indicators accessing post 16 college placements through choice, rather than their mainstream local school. In terms of support for vulnerable learners, all secondary schools have access to school based counsellors, Youth Engagement and Participation Officers, Emotional Literacy Support Assistants, Thrive practitioners, pastoral support and wellbeing staff. In addition, every secondary schools has a nominated Young Carers Champion or a Designated Children Looked After Lead to whom young carers or children who are looked after are able to go to for support and guidance. Specialist advice and guidance can also be provided by the Council's Young Carers Officer or the dedicated Children Looked After Team in the Access and Inclusion Service. These professionals can also act as advocates for learners when considering post 16 options and securing appropriate support and transport.

The new provisions under consideration, will have greater scope to develop specialist teams to meet the needs of vulnerable learners as the size of the organisations will have obvious economies of scale.

In order to ensure effective transition arrangements, a Middle Leaders Programme has been established to develop excellent transitional plans and cluster based approaches. Transition plans will be developed and additional funding will be provided to developed leadership skill and capacity and to ensure that robust cluster based transitional approaches are developed and adopted to mitigate the risks.

There is a statutory duty placed upon the LA to provide learners with free transport to their nearest suitable school if they reside beyond safe “walking distance” to that school. The term suitable school applies to the catchment area English, Welsh or dual language mainstream school or special school/class as appropriate. The law relating to safe “walking distance” is defined as two miles for learners of compulsory school age receiving primary education and three miles for learners of compulsory school age receiving secondary education.

Rhondda Cynon Taf County Borough Council has exercised the discretionary powers afforded to it under the provisions of the Learner Travel (Wales) Measure 2008 to make a more generous provision to learners as set out below:

- The eligibility criterion for walking distance for learners receiving compulsory primary education at their nearest suitable school has been set at 1½ miles, instead of 2 miles as required by the Measure;
- Free transport to their nearest suitable school, where places are available, is provided to children who meet the 1½ mile eligibility criterion from the start of the Foundation Phase (the start of the school term after their third birthday), rather than from the start of compulsory education (the start of the school term after their fifth birthday) as required by the Measure.
- The eligibility criterion for walking distance for learners receiving compulsory secondary education at their nearest suitable school has been set at 2 miles instead of 3 miles as required by the Measure.
- Free transport is provided to post 16 learners who meet the 2 mile eligibility criterion for two years after the end of compulsory education, rather than until the end of compulsory education as required by the Measure. This provision applies to full time attendance at the nearest school or college to the learner’s home at which the approved course of study that they wish to pursue is offered.
- Free transport to their nearest suitable school is provided to learners (as set out above) in accordance with their preferred religious denomination.

- The term suitable school applies to the catchment area English, Welsh, dual language or voluntary aided (faith) mainstream school or special school/class as appropriate.

Some Primary Schools learners will have to travel longer distances to schools, likewise sixth form learners may have longer journeys to the new post-16 provisions. In the case of the primary school learners, it is highly unlikely that any child will have further than 1.5 miles to travel to their new school and not qualify for home to school transport; this is the distance at which RCTCBC currently provides home to school transport, which is more generous than that provided for by legislation, i.e. 2 miles. It is the full responsibility of parents to transport their children to school where they do not qualify for free provision, they also have to determine and provide appropriate supervision for children and decide the mode of transport to be used. Free provision will be made available where learners meet the qualifying criteria.

With regard to the proposed alternative sixth form centres for Hawthorn and Pontypridd High School at Bryncelynnog Comprehensive School and Coleg y Cymoedd, learners will receive free transport, providing they meet the qualifying criteria (2 miles walking distance from home to school/college), to the nearest post-16 establishment that offers the choice of courses that they require. If they choose a centre that is not the closest to their home address, they may of course attend but will not receive any assistance towards the cost of transportation from the Council.

Learners resident in Rhondda Cynon Taf attending Cardinal Newman RC Comprehensive School, will be able to select the most appropriate sixth form provision that offers the choice of courses that they require or if they choose a Roman Catholic post 16 provision this will be made available at St David's College, Cardiff. In doing so they will receive free transportation, providing they meet the distance criteria to the nearest provision that meets their subject choices. For learners' resident outside of RCT will need to check their entitlement with their home local authority (LA). However, there is currently a bus that transports Caerphilly learners (if eligible) to and from St David's College. Learners eligible to free school meals will still access their entitlement at post 16.

The effective transportation of learners with complex ALN and travel training will be an integral part of preparing learners for transition at post 16 and arrangements will be informed by person centred plan.

Full assessments of all available walking routes will be undertaken to ensure that they meet all safety criteria and standards laid down in the Learner Travel Measure 2014. Traffic Impact Assessments will be undertaken and improvements will be made

where identified. Further information on the impact on travel and transport can be found in the Consultation Report on pages 9 and 20-21 and in the Objection Report on pages 14, 16 and 41-50, and further information on the environmental impact can be found on pages 18-19 in the Consultation Report.

The Principal of St David's College is committed to partnership working with Rhondda Cynon Taf and has provided the necessary reassurances that there is capacity to meet increased pupil numbers. Moving forward Carinal Newman will be considered as a feeder school and such applications will be given appropriate consideration.

All of the primary schools under consideration as part of these proposals have breakfast club provisions, which are not only considered to be of benefit to the learners but can greatly assist working parents and carers as well. These clubs will continue if the new 'all through' 3 - 16 schools are created. Many schools also offer some after school provision which has the same benefits as the breakfast clubs; it is hoped that transferring primary aged learners to school sites that have improved facilities will allow for the expansion of this provision. Governing bodies will be encouraged to establish provisions as these are not a statutory requirement.

Every attempt will be made to frequently engage with staff during the management of change process and to ensure that communication is frequent and HR support is readily accessible. If staff are displaced every attempt will be made to provide interim arrangements or redeployment opportunities.

INVOLVEMENT & CONSULTATION

9. What involvement and consultation has been done in relation to this (or similar) policy and what are the results?

In accordance with the School Organisation Code there is no requirement to hold consultation meetings, however in order to fully engage with consultees and to enable Elected Members to make a decision based on the concerns of the wider community to understand the issues raised.

In addition, the prescribed consultation period within the Code is 42 days but Council gave the public 108 days in which to respond, which is more than double the statutory timescales allotted within the Code.

This extended statutory period was undertaken to provide additional opportunities for all consultees to make their views known and the following consultation meetings/ open events were held.

School Affected	Group	Time/Date	Venue
Hawthorn High School	Governors and Staff Meeting	Monday, 12 th November 2018, 3.30 pm	Hawthorn High School
Pontypridd High School	Governors and Staff Meeting	Monday 12 th November 2018, 3.30 pm	Pontypridd High School
Heol-Y-Celyn Primary School	Governors and Staff Meeting	Wednesday 14 th November 2018, 4 pm	Heol-Y-Celyn Primary School
Hawthorn Primary School	Governors and Staff Meeting	Wednesday 14 th November 2018, 4 pm	Hawthorn Primary School
Cilfynydd Primary School	Governors and Staff Meeting	Monday, 19 th November 2018, 4pm	Cilfynydd Primary School
YGG, Pont Sion Norton	Governors and Staff Meeting	Tuesday, 20 th November 2018, 4pm	YGG, Pont Sion Norton
Bryncelynnog Comprehensive School	Governors and Staff Meeting	Thursday, 22 nd November 2018, 3.30pm	Bryncelynnog Comprehensive School
Cardinal Newman RC Comprehensive School	Governors and Staff Meeting	Thursday, 22 nd November 2018, 3.30pm	Cardinal Newman RC Comprehensive School
Hawthorn High School	School Council	Monday, 12 th November 2018, 2 pm	Hawthorn High School
Pontypridd High School	School Council	Monday, 12 th November 2018, 2 pm	Pontypridd High School
Heol-Y-Celyn Primary School	School Council	Wednesday 14 th November 2018, 2.30pm	Heol-Y-Celyn Primary School
Hawthorn Primary School	School Council	Wednesday 14 th November 2018, 2.30pm	Hawthorn Primary School
Cilfynydd Primary School	School Council	Monday, 19 th November 2018, 2.30 pm	Cilfynydd Primary School

School Affected	Group	Time/Date	Venue
YGG, Pont Sion Norton	School Council	Tuesday, 20 th November 2018, 2.30 pm	YGG, Pont Sion Norton
Bryncelynnog Comprehensive School	School Council	Thursday, 22 nd November 2018, 2 pm	Bryncelynnog Comprehensive School
Cardinal Newman RC Comprehensive School	School Council	Thursday, 22 nd November 2018, 2 pm	Cardinal Newman RC Comprehensive School
Cardinal Newman RC Comprehensive School	Parents and public drop in session	Tuesday, 15 th January 2019, 3 – 6 pm	Cardinal Newman RC Comprehensive School
Bryncelynnog Comprehensive School	Parents and public drop in session	Wednesday, 16 th January 2019, 3 – 6pm	Bryncelynnog Comprehensive School
YGG Pont Sion Norton and Heol-Y-Celyn Primary Welsh Department – both schools and members of the local community	Parents and public drop in session and exhibition	Thursday, 17 th January 2019, 4 – 6pm	Rhydyfelin Children’s Centre
Hawthorn High, Hawthorn Primary and Heol-Y-Celyn Primary– all three schools and members of the local community	Parents and public drop in session and exhibition	Tuesday, 22 nd January 2019, 3 – 6 pm	Hawthorn High School
Pontypridd High and Cilfynydd Primary – both schools and members of the local community	Parents and public drop in session and exhibition	Thursday, 24 th January 2019, 3 – 6 pm	Pontypridd High School

Interested parties were welcomed to put their views in writing to:

Director of Education and Inclusion Services
Rhondda Cynon Taf County Borough Council
Ty Trevithick
Abercynon CF45 4UQ

e-mail schoolplanning@rctcbc.gov.uk

A Consultation Report was published in March 2019 following the Consultation period. This report contained a summary of the issues raised by consultees, a response to the issues raised, and Estyn's view on the merits of the proposal. This document is available to view online on the Council's website. However all comment and issues raised during this period were provided to Cabinet to review all concerns and issues raised prior to a decision being made.

Since publishing the Consultation Report, Cabinet agreed to move on with the school organisation process and Statutory Notices on the proposals were published triggering an Objection Period which was held from April 30th until May 31st 2019.

The objections received during this period have been collated and all have been provided to Cabinet Members to review prior to a decision on the implementation of the proposals being made. The Objection Report will be published within 7 days of a decision being reached.

MONITORING AND REVIEW

10. What arrangements have you put in place to review the actual impact of the proposals once it has been implemented?

The Council's school improvement team will be fully engaged in supporting all head teachers, school staff and the governing bodies of all schools involved during the first year or so, or for however long they require such support. Support with staff recruitment and for the temporary governing bodies, including a clerking service will be provided by the HR Division and the Governor Support service. Perception surveys will be undertaken with parents/carers, pupils and staff after the schools have been in operation for 6 months and annually thereafter. Feedback received will be evaluated and any necessary actions implemented will be shared with learner, parents/carers, school staff and governing bodies. In addition, these outcomes will be shared with the Children and Young People Scrutiny Committee and Welsh Government 21st Century Schools and Colleges Team.

ADDRESSING THE IMPACT

11. What option have you chosen as a result of your impact assessment?

Following a robust and comprehensive consultation process, the evidence suggests that the rationale for implementing the proposals for change as outlined in the Consultation Document and summarised in this and previous reports remains entirely appropriate and valid.

Please indicate and provide reasons for your decision.

The evidence outlined in our consultation document and subsequent consultation report demonstrates that this is the right approach. The proposals will be submitted to Elected Members for consideration.

12. ACTION PLAN

You now need to complete the EIA action plan to outline how you will act on any impacts identified. You may need to prioritise in terms of what actions you choose to take and the timescales to complete them in. In general terms, you should try to act on all negative impacts unless there is a clear reason as to why this is not possible. You could also identify actions for positive or neutral impacts where appropriate i.e. to outline and further promote a positive impact or to outline how to make something have a positive impact instead of a neutral one.

EQUALITY IMPACT ASSESSMENT ACTION PLAN

Action	Responsible Officer	Timescale for Actions	Timescale and actions for Review	Measures to be taken to evaluate effects of actions
Publish Objection Report with objection summary	Director of Education and Inclusion Services	Before the end of 7 days beginning with the day of its determination		
Establish a professional learning forum for core subject area leaders	Heads of Primary and Secondary Achievement	By September 2021	April 2022	Stakeholder feedback and evaluation of programme
Half-termly School Improvement Forums to be established to facilitate the sharing of good practice within and between schools	Heads of Primary and Secondary Achievement	By September 2022	½ termly from Sept 2022	Routine analysis of performance data and challenge advisor/senior officer feedback
Potential Middle Leaders Programme – Excellent Transition Practice to be extended	Heads Primary and Secondary Achievement	Ongoing but new candidates identified by September 2021	April 2022	Stakeholder feedback and evaluation of programme
Potential Middle Leaders Programme – Leading from the Centre to be extended	Heads Primary and Secondary Achievement	Ongoing but new candidates identified by September 2021	April 2022	Stakeholder feedback and evaluation of programme
Support to develop curriculum plans with	Heads Primary and Secondary	By September 2021	April 2022	Development of robust and achievable

Headteachers	Achievement			curriculum plans
Professional learning forum to be established to include all of RCT's all through schools	Heads Primary and Secondary Achievement	By September 2021	April 2022	Stakeholder feedback and evaluation
Early appointment of Heads to ensure robust planning and preparation for the new schools	Head of HR/Director of Education in partnership with Governing Bodies	By September 2021	Termly support and challenge meetings following appointment	Successful completion of performance targets
Programme of transition opportunities to be developed across cluster schools to ensure consistency and quality of learner experience	Heads Primary and Secondary Achievement	By September 2021	Termly	Effective implementation of transition plan/s
Early identification of vulnerable learners to ensure robust person centred planning in partnership with parents/carers and external agencies where appropriate to ease transition	School ALNCo/CLA or Young Carers Lead in partnership with Access and Inclusion Officers, Young Carers Team and parents/carers.	By September 2021	April 2022	All appropriate person centred plans to be developed dependent on presenting needs. This could include: Pastoral Support Plan; Personal Education Plan; Individual Education/Behaviour Plan; Statement of SEN; or Individual Development Plan.
Early engagement with staff members and trade unions to ensure effective	HR	By September 2020	Termly progress meetings	Trade Union and staff feedback

implementation of the Council's management of change policy and early identification of potential redeployment opportunities for any displaced staff				
To finalise all plans with input from key stakeholders (school governing bodies, school councils, school staff, specialist advisors on ALN, Welsh Government etc) for school building design and construction and repair/refurbishment of existing buildings	Director of Corporate Estates and Head of 21 st Century Schools	By September 2020	Monthly meetings	Regular review of construction programme action plans
To undertake any highways works that are identified as required to improve walking routes and to make arrangements for any transport provision that may be identified.	Director of Highways and Transportation	By September 2022	Monthly meetings	Regular review of construction programme action plans
To agree and provide free transport to eligible learners and support parents/carers during the application process	Director of Highways and Transportation	By September 2022	April 2022	Free transport to mitigate increased travel distances for learners affected.
Work with Governing Bodies	Director of Education	By September 2022	April 2021	Consultation with

to establish childcare facilities to support working families – including breakfast and after school clubs	and Inclusion Services			relevant governing bodies
--	------------------------	--	--	---------------------------

13. Please outline below any negative impacts that have been identified in the EIA questionnaire but not addressed in the action plan. You will need to explain your reasons for not addressing them.

None

Please keep a copy of the questionnaire and action plan and send copies to:

Equality, Diversity & Social Justice Team
The Pavilions
Cambrian Park
Clydach
CF40 2XX

Email: equality@rctcbc.gov.uk

Tel: 01443 424075

Signed: Gaynor Davies Revision Date: 01/07/2019
Job Title: Director of Education and Inclusion Services