Proposal to Change the Nature of Provision at Ysgol Y Felin

Consultation Document



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School	Mod	larnie:	ation	Section
JUIUUI	IVIOU	16111136	111011	JEGUUII

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Foreword

On 25th June 2018 in accordance with Welsh Government Strategic Plans the Local Authority launched <u>Carmarthenshire's Welsh in Education Strategic Plan</u> and our vision for a bilingual Carmarthenshire. To achieve this, we will deliver significant growth in Welsh medium education to increase the number of children and young people who become fluent in both Welsh and English and have the ability to use their languages confidently with their families, in their communities and in the workplace.

With this in mind, the Local Authority has a responsibility to provide its communities with the best education and opportunities possible and believes that this can be achieved through set objectives. Carmarthenshire County Council are fully supportive of the aim that all pupils are able to speak, read and write in both Welsh and English fluently by the end of Key Stage 2 and will provide services that will ensure high quality learning opportunities for all Carmarthenshire's children, young people and adults, thereby enabling them to achieve their full potential as lifetime learners in the context of the unique bilingual nature of the County.

The Local Authority not only supports this vision, but are wholly supportive of a bilingual Wales. On the 10th July 2017 the Welsh Government published "Cymraeg 2050: A million Welsh Speakers" with the aim of reaching a million Welsh speakers in Wales by 2050. The document considers three key themes:

- Increasing the number of Welsh speakers;
- · Increasing the use of Welsh; and
- · Creating favourable conditions, infrastructure and context

all of which we must consider in our own locality where our education system can support, develop and sustain bilingualism.

In order to support Carmarthenshire's Welsh in Education Strategic Plan and national policies in moving the county's schools along the Welsh language continuum, this consultation document sets out proposals with regards to the change in nature of provision of the Foundation Phase at **Ysgol Y Felin.**

Consultation will follow the guidelines established by the Welsh Government as set out in the <u>School Organisation Code 2018</u> and will involve identified interested parties. The information set out in this document is intended to clarify the proposals for your school and support the consultation process.

Gareth Morgans

Director of Education and Children's Services

Glossary of Abbreviations

ALN Additional Learning Needs

AN Admission number

CCC Carmarthenshire County Council

CP Community Primary

DS Dual Stream

EM English medium

Estyn Her Majesty's Inspectorate for Education and Training in Wales

FTE Full Time Equivalent

LA Local Authority

MCSW Measuring the Capacity of Schools in Wales

MEP Modernising Education Programme

NOR Number on Roll

PLASC Pupil Level Annual School Census Data

PT Part time

WESP Welsh in Education Strategic Plan

WG Welsh Government

WM Welsh medium

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Introduction

Carmarthenshire County Council has a legal responsibility to review the number and type of schools it maintains in the area and whether or not it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

As part of this process the Council has published its vision on how it sees the future for all of the primary and secondary schools in the County and this includes consulting on the future shape of education in Ysgol Y Felin.

This consultation document outlines current provision and options to determine the optimum solution for meeting future need.

Background

Ysgol Y Felin is a dual stream primary school based in Felinfoel, Llanelli. The school provides education to pupils between the ages of 4-11 years old.

In recent years, pupil numbers have remained consistent.

Based on current pupil projections it is estimated that the pupil figures will remain consistent.

Ysgol Y Felin School building condition is **Grade B** – Satisfactory (Performing as intended but exhibiting minor deterioration).

The school's most recent Estyn inspection completed in September 2016 judged the school's current performance and prospects for improvement to be **Good**

The Local Authority has a responsibility to provide all pupils with the best education possible and believes that providing bilingual opportunities has a role to play in this. This aligns with Carmarthenshire's Welsh in Education Strategic Plan 2017-2020's objective of ensuring "that all pupils are able to speak, read and write the Welsh language fluently by the end of Key Stage 2 in accordance with their expected stage of development." The best way to create confident, bilingual individuals is through immersing pupils in the Welsh language and as a result the Local Authority is looking to change the nature of provision.

Rationale for Change

Ysgol Y Felin

This proposal has been prepared in response to Carmarthenshire County Council's Welsh in Education Strategic Plan (WESP) and the Welsh Medium Education Strategy (WMES). The Local Authority has a vision for a bilingual Carmarthenshire. To achieve this, we will, in accordance with 'Cymraeg 2050: A Million Welsh Speakers':

"Ensure significant growth in Welsh-medium education and training to increase the number of people of all ages to become fluent in both Welsh and English and have the ability to use their languages confidently with their families, in their communities and in the workplace"

As a result, it is the Local Authority's proposal:

• From 1st September 2022 the nature of Foundation Phase provision at Ysgol Y Felin will change to Welsh medium education.

This will only affect pupils starting in the Foundation Phase at the school from September 2022 onwards.

Current pupils attending the school will be unaffected.

With learners accessing Welsh medium education in the Foundation Phase the capacity of the Welsh stream in KS2 to cope with the potential increased demand for places will have to be monitored and reviewed in line with Carmarthenshire's Welsh in Education Strategic Plan.

This proposal will support the development of bilingual and multilingual opportunities in line with the new curriculum to be launched in 2022.

Should the proposals be implemented, all future pupils at the schools subject to proposals will receive their Foundation Phase education through the medium of Welsh with the choice of language medium being introduced at Key Stage 2.

This proposal will serve to implement the 7 outcomes noted below as specified by WG in 'Carmarthenshire's Welsh in Education Strategic Plan':

- Outcome 1: More seven year old children being taught through the medium of Welsh
- Outcome 2: More learners continuing to improve their language skills on transfer from primary to secondary school
- Outcome 3: More students aged 14-16 studying for qualifications through the medium of Welsh

- Outcome 4: More students aged 14-19 study subjects through the medium of Welsh, in schools, colleges and work-based learning
- Outcome 5: More students who have higher language skills in Welsh
- Outcome 6: Welsh medium provision for learners with additional learning needs (ALN)
- Outcome 7: Workforce planning and continuing professional development

In addition, this proposal will link to Welsh Government Policies as stated below:

- Rewriting the Future
- Successful Futures
- Well-being of Future Generations (Wales) Act 2015
- Welsh Government's Draft Strategy; and
- 21st Century Schools and Education Programme

Early Welsh Medium Immersive Provision

The immersion method focuses on using Welsh as the predominant medium of teaching and learning, using practical and visual techniques to help children and pupils to develop vocabulary and syntax. The essence of this method is introducing and modelling good language. Also international evidence confirms that 'the most effective way of developing bilingual children is to immerse them in the less common language whilst also developing their skills in the more common language.' Young children do not need to learn a language as adults do. They absorb languages if they are exposed enough to them.

There is an abundance of research showing that investing in the first years of a child's life improves outcomes for them throughout the rest of their lives.

The change to Welsh medium education at Foundation Phase will strengthen pupils' bilingual skills from an early age providing them with a firm foundation for future linguistic development.

As qualified by research the presence of two languages in the operating system of the brain is likely to produce a more richly fed thinking engine (Baker, 2000:66-67). Therefore, this proposal provides pupils with increased opportunities to reach their full potential as bilingual learners.

Bilingualism

Advantages of Bilingualism

What does being bilingual mean?

The ability to live your everyday life using two languages.

Being able to switch from one language to another fluently and confidently at any given time.

The advantages of being bilingual

Education

- Bilingual children tend to be more successful in education. They tend to perform better in tasks.
- Bilingual people find it easier to learn additional languages.
- Children in Welsh medium education do just as well, if not better, in English as children in English medium education.

Evidence:

https://www.estyn.gov.wales/sites/default/files/documents/English%20in%20key%20stages%202%20and%203%20-%20June%202014.pdf

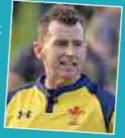
Career

- Speaking two languages is an extra skill to put on your application form and CV.
- Bilingual people earn an average of 11% more income.
- Employers need bilingual workforces in Wales, because services need to be offered bilingually in accordance with the Welsh Standards Paper.

Evidence: http://www.walesonline.co.uk/news/wales-news/welsh-speakers-more-likely-top-6335953

Nigel Owens

Without my Welsh education in School I would not have had all the opportunities to present and perform and I would not have been encouraged to start as a referee at 16 years old.



I carry Welsh with me wherever I referee in the world. Before each game I listen to Welsh music.

I'm lucky enough to have two languages and Welsh is an important part of who I am. >>

Alex Jones

Having a bilingual education has been pivotal to me in so many ways. It meant that I had twice as many opportunities, it doubled my capacity to learn other languages, it enhanced my ability to communicate and therefore make friends, and most importantly, it gave me a strong sense of belonging and of our



heritage. Starting out as a broadcaster in Welsh gave me the vast experience I needed to move forward to my dream job. Without a bilingual education, I'd be in a very different place. >>

Health

 Research shows that being bilingual delays the onset of Dementia and other symptoms of Alzheimer disease.

Evidence: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3033609/ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3033609/ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3033609/ https://www.telegraph.co.uk/news/science/science-news/12005837/Bilingual-people-twice-as-likely-to-recover-from-a-stroke.html

Life

- Speaking two languages widens your horizons.
- Being able to speak Welsh gives you access to many aspects of Welsh culture,
 history and identity.
- Speaking Welsh can provide a key to rich community life.

- Being able to speak Welsh gives you a strong sense of identity and belonging.
- Being able to switch from one language to the other with confidence gives the individual self-confidence and pride.
- Speaking many languages can make people more tolerant towards other cultures.

Common parental concerns

'How can I help my child with homework if I don't understand much Welsh myself?'

Welsh schools set homework instruction in Welsh and in English so there will be no problem in understanding what your child is being asked to do at home. The schools themselves will be happy to provide educational advice and the parents evening will be in your chosen language.

Work set will be appropriate to the pupil's age and ability level and therefore should be within your child's reach.

Developing increasingly as independent learners, you may find that your child is happy to progress without extra parental guidance as they get older.

<u>Booklet - Welsh Homework? No problem</u> (English version) <u>Booklet - Gwaith Cartref? Dim problem</u> (Welsh version)

'Will pupils who struggle with Welsh medium education have to move to an English medium school?'

It is the Local Authority's desire that all pupil receive the opportunity to become bilingual in both Welsh and English languages. In Welsh medium schools, pupils will receive their education principally through the medium of Welsh, with English being taught as a subject in Key Stage 2 and used as a medium for instruction. Sufficient support will be provided to all pupils as required through a range of mechanisms and tailored to the individual's needs.

'The children will be confused and their English will suffer.'

On average, bilingual children achieve higher grades in the English language. Also, as a child explains homework in English to the parent, their own understanding is reinforced. Ask your child to describe what he/she is doing in his own words.

On average, about 80% of Carmarthenshire pupils who attend Welsh medium education get an A* to C grade in both Welsh and English.

'Will my child's thinking be affected by being bilingual?'

The answer is "yes", and probably for the better. The presence of two languages in the operating system of the brain is likely to produce a more richly-fed thinking engine (Baker, 2000:66-67).

'Will my child be able to cope with learning through the medium of Welsh?'

School and staff are fully committed to providing the necessary support to all pupils and parents through a wide range of mechanisms: open door policy; homework provided bilingually; support by The Athrawon Bro Service; bilingual school website etc. Staff are also required to differentiate the curriculum and make reasonable adjustments when required to meet the needs of every pupil.

'Should the Welsh language be forced?'

International evidence, cited by the Welsh Government, confirms that the most effective way of developing bilingual children is to immerse them in the less common language whilst also developing their skills in the more common language. This is consistent with national policy to expand Welsh medium education in order to develop increasing numbers of fully bilingual young people and to enable more children to benefit from the advantages of bilingualism, gathered through international research.

'Will learning through the medium of Welsh affect later life opportunities?'

Yes, but probably for the better. It is the belief of the department, based upon international evidence and local experience, that children benefit from a truly bilingual education, which provides wider skills developments, such as cognitive ability, task understanding and flexibility, enhanced powers of concentration etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals' cultural experiences and can enhance career prospects. Bilingualism will increasingly over time become an employment skill and possessing Welsh language skills will increasingly over time give individuals a competitive advantage when seeking employment.

'Does learning through the medium of Welsh segregate English speaking pupils/families?'

On the contrary, learning through the medium of Welsh provides all children with opportunity to become fully bilingual with the skills to be able to read, write and speak in both Welsh and English languages by the time that they leave primary school. In Welsh medium schools, children receive their education principally through the medium of Welsh with English being taught as a subject in Key Stage 2 and used as a medium of instruction. Learning through the medium of Welsh also helps family/community members with the opportunity to develop their Welsh language skills.

'Will children with additional learning needs be able to learn through the medium of Welsh?'

Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. In the vast majority of cases, this is achieved, with all children benefitting. All pupils with additional learning needs have specific individual plans based on their circumstances and a tailored support programme is provided according to need. Generally, an additional learning need is not a barrier to learning two languages. There will be rare instances, however where a child may be diagnosed with a condition that is not conducive to a fully bilingual education. In these circumstances a package of support is identified by professional practitioners and discussed with parents.

Carmarthenshire Language Learning Centres

Due to the nature of the county we need to provide a language service to all latecomers so that they can become fully assimilated into our bilingual communities and are steeped in Welsh language and culture. In order to achieve this, we need to address the importance of dedicated facilities to support latecomers to a level where they can easily integrate into the day to day timetable in Welsh medium schools. Thorough research shows that this can be more easily achieved through intensive language courses. Language centres are the vehicles needed to ensure that this becomes a reality. As alluded to above, the language centres will also provide language support for parents and pupils and will also have provision for professional learning and Welsh for Adults.

Bilingualism in Carmarthenshire

Further information can be found using the following links:

• Cymraeg gyda'r plant / Welsh with your kids- give it a go!

http://newsroom.carmarthenshire.gov.uk/media/1214148/gd4808-taflencymraegiplant4-002.pdf

Within this booklet you will find a number of useful Welsh words and phrases which can be used to practise the Welsh language with young children. This will help them to speak naturally and confidently.

• Bod yn Ddwyieithog... yn Sir Gâr / Being Bilingual... in Carmarthenshire

https://www.carmarthenshire.gov.wales/media/1216432/being-bilingual.pdf

This booklet details what it means to be bilingual whilst highlighting the advantages that can be achieved from being bilingual in areas such as education, career, health and life. In addition, within this booklet you will find the answers to many common parental concerns regarding the Welsh language.

• Welcome to Wales Welcome to Carmarthenshire Welcome to Welsh

http://newsroom.carmarthenshire.gov.wales/media/1216436/welcome-pack.pdf

This booklet has been prepared by Carmarthenshire County Council to welcome newcomers to its bilingual County. Within the booklet you will find information on how the Welsh language is used in Carmarthenshire along with details on where you can find Welsh language support and useful websites to visit to develop your Welsh language skills

The Consultation Process

The consultation on this proposal will follow guidelines established by the Welsh Government as stated in the School Organisation Code (2018).

Who will be consulted?

This document will be sent to the following interested parties:

Staff (Teaching and Ancillary)	Director of Education – All Neighbouring Authorities
Governors and Parents/Guardians	Diocesan Director of Education Church in Wales and RC
Local County Councillors	Estyn
Community Councillors	Regional Transport Consortium
Members of the Senedd (MS) / Regional	Neighbouring Primary and Secondary
Members / Members of Parliament (MP)	schools
Welsh Ministers	All relevant unions
SEN Partners	Welsh Language Commissioner
LA Special Educational Needs Division	Local Police and Crime Commissioner
ERW – Education through Regional	Flying Start
Working	Child Care / Early Years
Communities for Work +	Public Services Board
Communities for Work	Legacy
Fusion	Families First Carmarthenshire

^{*}Copies of the consultation document will be sent to the Head teacher and Chair of Governors of the surrounding catchment area of schools subject to proposals.

Consultation Period

The consultation period for the proposals starts on 22nd February 2021 and ends on 4th April 2021.

Consultees can submit their views in favour of or against a proposal. Responses received during the consultation period will <u>not</u> be treated as statutory objections. If consultees wish to object, they will need to do so in writing during the statutory objection period outlined on page 16.

Considering your views

During the consultation period you can ask questions and express your views by writing a letter to the address below or by completing an online survey using the following link: SNAP SURVEY

Letters should be sent to the following address by no later than 4th April 2021:

Mr Gareth Morgans, Director of Education and Children's Services, Building 2, St. David's Park, Jobs Well Road, Carmarthen, SA31 3HB Or E-mail to: DECMEP@carmarthenshire.gov.uk

Drop in sessions

Due to the ongoing implications of the Coronavirus pandemic the drop-in session will be held virtually via Microsoft Teams on 10th March 2021 at 4:30pm for a period of two hours. However, if this is not suitable for you, we are able to offer alternative means of communication such as email or telephone call.

Should you wish to attend the virtual drop-in session please contact Mr Roger Bowen on the above email address to register your interest by the **8**th **March 2021**.

Consultation with Pupils

There will be an opportunity for the pupils of the school subject to the proposals to participate in the consultation process.

The information gathered from the consultation with pupils will form part of the consultation report which will be submitted to the Executive Board for consideration following the consultation period.

Consultation Report

A Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks before a decision is made on whether or not to proceed to publish a statutory notice. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees and provide Carmarthenshire County Council's response to these issues. The report will also contain Estyn's view of the proposal and details of consultation undertaken with the pupils.

The Executive Board of Carmarthenshire County Council will consider the consultation report and decide whether or not to proceed with the proposal.

If the Executive Board decides to continue with the proposal Carmarthenshire County Council must publish a statutory notice.

Statutory Notice

The statutory notice will be published on Carmarthenshire County Council's website and posted at the schools subject to proposals. Copies of the notice will be made available to the schools to distribute to pupils, parents, guardians, and staff members (the schools may also distribute the notice by email).

Statutory Objection Period

The statutory notice will set out the details of the proposal and invite anyone who wishes to object to do so in writing within a period of 28 days. If objections are received an objection report will be published on the Carmarthenshire County Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide Carmarthenshire County Council's response to those objections.

Determination of Proposal

Carmarthenshire County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications. In doing so, the County Council will take into account any statutory objections that it received.

Decision Notification

Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.

The Statutory Process Time-Table

The statutory process and timetable will be as follows:

22 nd February 2021	Issue of this consultation document to identified and other interested parties.				
4 th April 2021	Closing date for views on the proposal to be received by the Department for Education and Children.				
27 th April 2021	The Consultation Report will be published on Carmarthenshire County Council's website at least 2 weeks prior to the publication of a statutory notice.				
10 th May 2021	A Consultation Report will be taken to the Executive Board for a decision on whether or not to proceed to publish a statutory notice. OR alternatively proposal ends.				
11 th May 2021	If the decision is made to proceed then a statutory notice will be published. The notice will outline details of the proposal and be published on the Council's web site and be displayed near the entrance of the school and schools which are subject to the proposals. Copies of the notice will be made available to the school to distribute to parents, guardians and staff members. Following publication there will be a 28 day period during which time formal written objections will be invited. The statutory notice will give details on how you may record				
8 th June 2021	your objections to the proposal. End of formal 28 day notice period for objections. County Council will determine the proposal. The County Council may decide to approve, reject or approve the proposal with modifications, in doing so the County Council will take into account any statutory objections received.				
July 2021	Deadline to notify parents of intention to implement proposal. Following determination of proposals all interested parties will be informed and advised of the availability of the decision which will be published electronically on Carmarthenshire County Council's website.				

School subject to proposal

		Ysgol Y Felin		
School Locat	ion	Ynys Wen,		
		Felinfoel,		
		Llanelli.		
		SA14 8BE		
Age Range	(0) 1: [0])(1:	4 – 11		
	ory (Community [C], Voluntary Aided Controlled [VC])	Community Primary		
Language Ca	tegory	Dual Stream		
Number of	Nursery Age	17		
registered	Reception – Y.6	205		
Pupils (January	Total	222		
2020)		(exc Special Unit)		
Number of	January 2019	219		
pupils	January 2018	222		
previously	January 2017	226		
on the January 2016 register		224		
Pupil	January 2021	218		
Projections	January 2022	220		
	January 2023	217		
	January 2024	217		
	January 2025	215		
Capacity (incl	luding nursery age)	240		
Cost per pupi	I	£5,125		
School Budge	et	£1,138,000		
Estyn Inspect	ion Result	<u>ESTYN</u>		
Building Cond	dition Category	В		

The Proposal

• From 1st September 2022 the nature of Foundation Phase provision at Ysgol Y Felin will change to Welsh medium education.

This will only affect pupils starting in the Foundation Phase at the school from September 2022 onwards.

Current pupils attending the school will be unaffected.

With learners accessing Welsh medium education in the Foundation Phase the capacity of the Welsh stream in KS2 to cope with the potential increased demand for places will have to be monitored and reviewed in line with Carmarthenshire's Welsh in Education Strategic Plan.

Background

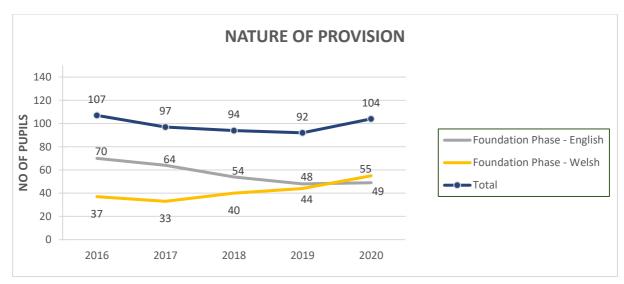
Ysgol Y Felin is a dual stream primary school based in Felinfoel, Llanelli.

The school provides education to pupils between the ages of 4-11 years old.

Rationale for Change

Foundation Phase data (Exc Special unit)

The graph below shows the relationship between the language streams and the number of pupils within the Foundation Phase at Ysgol Y Felin between January 2016-2020.



As can be seen from the graph above, the number of pupils attending the English stream Foundation Phase at Ysgol Y Felin has been decreasing and those attending the Welsh stream Foundation Phase have been increasing.

Pupil numbers in the English stream Foundation Phase ranged between 48-70 during January 2016-2020 whereas pupil numbers in the Welsh stream ranged between 33-55 pupils.

When considering the number of pupils attending the Foundation Phase as a whole, 47% attend the English stream whilst 53% attend the Welsh stream (January 2020).

Whole School data - English / Welsh Split

		Foundation Phase	Key Stage 2	Total (Excluding Special Unit)
2020	English Medium	49	81	130
	Welsh Medium	55	37	92
	Total	104	118	222
2019	English Medium	48	88	136
	Welsh Medium	44	39	83
	Total	92	127	219
2018	English Medium	54	88	142
	Welsh Medium	40	40	80
	Total	94	128	222
2017	English Medium	64	78	142
	Welsh Medium	33	51	84
	Total	97	129	226
2016	2016 English Medium		67	137
	Welsh Medium	37	50	87
	Total	107	117	224

(January PLASC Data 2020)

As can be seen from the table above, the number of children attending the Welsh stream at Foundation Phase (exc special unit) is greater than the number of children attending the English stream at Foundation Phase.

The number of children attending the English stream at Key Stage 2 (exc special unit) is greater than the number of children attending the English stream at Foundation Phase.

Advantages and Disadvantages of the proposal

Advantages

- Opportunity for pupils to gain early immersion in the Welsh language from a young age.
- Allows pupils to gain a firm foundation in the Welsh language
- Provides pupils with enhanced linguistic skills for further development in Key Stage 2

Disadvantages

- Potential local community resistance to the proposal
- Statutory process required to implement the proposal
- Potential loss of pupils to other schools

Risks and Counter Measures

Risk		Counter Measure
1.	Failure to obtain statutory approval to implement the proposal.	 Follow guidelines as set out in the School Organisation Code 2018.
2.	An unsatisfactory consultation with the community	 Develop communication strategy and consult on a regular basis to address concerns

Financial Implications - Revenue

Ysgol Y Felin funded in accordance with the County Council's Fair Funding policy and will receive resources on the same basis as any other school within the County Council, based on pupil numbers and facilities.

Admission Arrangements

The County Council is the Admissions Authority for Ysgol Y Felin

The School Admissions Unit, Carmarthenshire Local Authority, Department for Education and Children, Block 2, Main Building, St. David's Park, Carmarthen. SA31 3HB

Tel No: 01267 246449

E-mail: <u>admissions@carmarthenshire.gov.uk</u>

Alternative Options Considered

In developing a preferred option the Authority considered a range of alternative options.

Option 1 –Status Quo- no change to nature of provision

Advantages	Disadvantages		
No statutory process required	Does not support Welsh Government aim of 1 million Welsh speakers by 2050		
No Change for stakeholders	Does not meet the aims of the County's WESP		

Option 2 (Preferred Option) – Change in nature of Foundation Phase provision (Welsh Medium Foundation Phase and Dual Stream Key Stage 2 *)

Advantages	Disadvantages
Increases pupils' early linguistic skills	Requires statutory process
Parental choice of language medium remains in Key Stage 2	
Supports the aims of the County's WESP	

^{*}With learners accessing Welsh medium education in the Foundation Phase the capacity of the Welsh stream in KS2 to cope with the potential increased demand for places will have to be monitored and reviewed in line with Carmarthenshire's Welsh in Education Strategic Plan.

Option 3 -Change in nature of the whole school's provision (Welsh Medium Foundation Phase and Key Stage 2)

Advantages	Disadvantages
Generates bilingual citizens	Requires statutory process
Meets the aim of the county's WESP	

School Catchment Area

There will be no change to the current school catchment area.

Secondary School Transfers

There will be no change to the current transfer arrangements for pupils in respect of Secondary education.

Schools that may be affected by the proposal to change the nature of provision at Ysgol Y Felin:

		Swiss Valley Primary School	Dafen Primary School	Dewi Sant Primary School	Penygaer Primary School	Old Road Primary School	Five Roads Primary School
School Location		Heol Beili Glas, Swiss Valley Felinfoel Llanelli SA14 8DS	Lon yr Ysgol Dafen Llanelli SA14 8LL	Rhodfa Bryndulais Ave Llanelli SA14 8RS	Rhodfa Bryndulais Ave Llanelli SA14 8RS	Old Road Llanelli SA15 3HW	Five Roads Llanelli SA15 5EX
County				Carmarthe	nshire		
Age Range		4-11	3-11	3-11	3-11	4-11	4-11
						Community	
Language Ca	ategory	English Medium	English Medium	Welsh Medium	English Medium	English Medium	Welsh Medium
Number of registered	Nursery Age	14	24	79	18	17	7
Pupils (January	Reception – Y.6	222	130	392	172	154	80
2020)	Total	236	154	471	190	171	87
Number of pupils	January 2019	232	164	482	206	173	91
previously on the	January 2018	236	161	467	211	187	92
register	January 2017	239	163	440	222	153	95
	January 2016	238	141	434	219	174	90

Pupil	January 2021	240	156	465	197	163	88
Projections	,						
-	January 2022	246	160	458	199	153	95
	January 2023	241	158	458	196	148	96
	January 2024	238	162	467	194	150	94
	January 2025	242	160	464	196	150	93
Capacity		243	163	419	233	240	101
Cost per pup	il	£3,573	£3,707	£3,357	£3,589	£3,716	£3,688
School Budge	et	£870,000	£550,000	£1,504,000	£664,000	£635,000	£321,000
Estyn Inspec	tion Result	<u>ESTYN</u>	<u>ESTYN</u>	<u>ESTYN</u>	<u>ESTYN</u>	<u>ESTYN</u>	<u>ESTYN</u>
Building Con	dition Category	В	С	С	В	В	С

Building Condition Key:

Grade A	Good. Performing as intended and operating efficiently.
Grade B	Satisfactory. Performing as intended but exhibiting minor deterioration.
Grade C	Poor. Exhibiting major defects and/ or not operating as intended.
Grade D	Bad. Life expired and/or serious risk of imminent failure.

Evaluation of Present Arrangements

Ysgol Y Felin

Ysgol Y Felin School is a Dual Stream community School within a highly deprived and Community First area.

It caters for children from the ages of 4-11 years.

There are currently 222 pupils on roll at the school. The total number of pupils attending the school including pupils attending the special unit is 261.

Ysgol Y Felin provides education through the medium of Welsh and English across two streams. Parents choose a language stream from Reception onwards. Currently pupils are taught across 4 classes. There are 4 Welsh classes and 5 English classes due to a high intake of pupils entering Year 3 during the year and the need to split the numbers to reduce class sizes.

The children in the English classes are taught Welsh as a second language whilst the Welsh classes are taught through the medium of Welsh. There are 222 pupils on roll, 92 of whom are taught through Welsh, 130 through English and an additional 40 pupils are taught in a special educational needs (SEN) centre comprising of two Foundation Phase assessment and observation classes, a language unit and a Key Stage 2 class of pupils with severe learning difficulties (SLD Centre). The Centre is a purpose-built unit attached to the school building which houses the Language Unit class and also the Observation and Assessment classes.

The school was last inspected in September 2016.

Standards

Nearly all foundation phase pupils make the expected progress or better across all areas of learning from their starting points. The foundation phase indicator shows an increase trend and is higher than the local authority average. However, performance at upper outcomes remain very low across both languages and mathematical development.

Performance at upper outcomes in Personal Social Development (PSD) is extremely high at 90.9%. On the whole, many pupils make the expected progress or better between foundation phase and end of KS2. Welsh standards are good with nearly all pupils achieving the expected level and the minority achieving at higher levels. However, end of key stage 2 data in other subjects demonstrates a downward trend and is lower than the local authority average.

Many pupils demonstrate good literacy skills across the various subjects and areas of learning. Pupils' progress in literacy skills in both Welsh and English across the school

is generally good. In the Foundation Phase, many pupils talk confidently about their work and pupils who begin with low level linguistic skills develop quickly to take a meaningful role in classroom discussion.

Reading skills in both languages are developing steadily across the school. In the Foundation Phase, most pupils apply many suitable techniques to help them understand what they are reading. By the end of the Foundation Phase, they read confidently. In key stage 2, most pupils read effectively from a wide range of sources. They can use books and electronic sources effectively to research information for their class topics. However, the school is continuing to develop pupils' higher order thinking skills to support their progress in class and their understanding of text.

By the end of the Foundation Phase, many pupils produce pieces of writing of a good standard in both Welsh and English, using well-structured sentences in sequence. They generally spell familiar words correctly and use phonetic techniques appropriately to attempt more unfamiliar words. Pupils that are more able write at length for different purposes in different curriculum areas. By the end of key stage 2 in Welsh, boys and girls write well in different genres across the curriculum. However, 2018-19 data shows that boys underperformed in English writing but outperformed the girls in Oracy. Spelling and punctuation are generally in line with pupils' age and ability.

Wellbeing Standards:

Most pupils participate actively in lessons and are eager to learn. Nearly all work cooperatively and most remain on task for extended periods. They show a clear enjoyment in learning, especially in practical lessons, for example when examining Celtic artefacts.

Nearly all pupils are happy in school. They are aware of the importance of keeping healthy and safe including the need to use the internet responsibly. Most pupils know the importance of eating a balanced diet, drinking healthily and taking regular exercise. Over a half are involved in extracurricular activities including rounders, football and roller-skating. This reinforces their understanding of living healthily.

Nearly all pupils know what to do if they feel worried or have a problem. They have worked with the headteacher to develop a system of 'playground buddies' and have established a 'friendship bench' to ensure that pupils enjoy playtimes.

The behaviour of most pupils throughout the school is exemplary. Through a programme of agreed values, pupils understand the importance of showing respect and consideration towards adults and each other. This is a notable feature of the school. The school council and eco committee play an active part in the school and represent the pupils' needs well. The school council has played a proactive role in the management of behaviour on the playground and has introduced a 'luncheon club' and an area on the playground for vulnerable pupils. It also plays an important role in the implementation of the school's response to the Welsh Government's language charter initiative, and actively promotes the use of Welsh around the school. The eco committee has also been proactive in developing 'green' activities, such as designing planting areas within the school grounds, and working with the local community on a

'litter pick'. As a result, most pupils are aware of the importance of looking after the environment. Attendance has remained consistent through 2018 - 19 and is very slightly above from the previous year's percentage, at 91.7%. EFSM pupils' attendance also remains consistent at 89.8%.

Teaching and learning experiences

The quality of teaching across the school, and the impact on nearly all pupils' learning and progress, is consistently good.

Nearly all teachers have a thorough knowledge of the pupils' abilities and their individual needs, which enables them to use effective strategies to move the learning forward. In these cases, there is a good balance between teacher-led and pupil-led tasks to maintain a lively pace and provide focus for the pupils in learning sessions. Teachers use effective questioning to challenge and motivate pupils. As a result, in most lessons, pupils understand what the teachers expect of them, and teachers discuss with them how well they have achieved.

Nearly all teachers provide tasks at levels that are appropriate for a range of different abilities. This variety of activities maintains the interest of most pupils well. Nearly all teachers make very effective use of ICT resources to support their teaching. In nearly all classes, there is a positive working relationship between staff and pupils. This encourages most pupils to play an active role in the lesson. Nearly all teachers manage behaviour very well.

Most teachers' marking is effective in identifying ways for pupils to improve their work. In literacy, this enables pupils to redraft their work well. There are opportunities for pupils to assess their own and other pupils' work, and nearly all teachers use assessment for learning techniques appropriately in many activities. However, in a few lessons, this does not always lead to pupils knowing how they can improve their work.

The school provides a broad and balanced curriculum which meets the requirements of the Foundation Phase, the National Curriculum and religious education. Many teachers involve pupils in planning termly activities and engage the interests of most pupils effectively. In the best examples, they choose themes carefully and plan stimulating and exciting cross-curricular activities.

The school continuously implements successfully national and local priorities. These are integral to the performance management targets of all staff. The headteacher has arranged for all staff to undertake action research in line with the new national professional standards for teaching and leadership. These are incorporated into the performance management cycle. Leaders give a high priority to developing the workforce. For example, by supporting members following their return work and mentoring members of staff to ensure consistency in pedagogy and teaching standards across the school.

The school makes very good use of the locality and often introduces a new theme following a visit to a landmark or by involving external providers.

Teachers consistently plan, develop and enhance the pupils' awareness of the Welsh language, culture and traditions. Nearly all teachers use incidental Welsh during lessons and outside the classrooms, and encourage pupils to do the same. However, this does not always provide enough structure for pupils to learn from effectively. There is a clear scheme of work for developing Welsh in the English-medium classes to ensure that pupils make good progress. The school promotes a Welsh ethos effectively, and develops the Welsh dimension successfully in all aspects of school life. For example, the support of a local artist has resulted in pupils creating 3D models depicting the Rebecca riots. Nearly all teachers, particularly within the Foundation Phase, plan and make good use of the outdoor areas to enhance learning and teaching. For example, by creating a bug hotel, pupils learn about minibeasts and their habitats.

The school promotes sustainable development and global citizenship effectively through a range of curricular and extra-curricular initiatives and activities, for example, by composting school waste, maintaining links with a school in Malawi, and working to promote sustainable products, such as those available from local supermarkets – coffee, tea, and fruit.

Care support and guidance

Personal and social education is a strength and there is an obvious whole school emphasis on promoting and supporting pupils' wellbeing. Teachers promote pupils' spiritual, moral and cultural development successfully. Activities include regular collective worship, promoting values and taking part in local cultural activities. Visitors to the school also contribute positively to these aspects.

The staff support pupils with additional learning needs well by providing them with a wide range of effective interventions activities. This is a strength of the school. All staff know the pupils well and identify the more vulnerable of them at an early stage. The school has a very good track record in raising the achievement of vulnerable learners and is aware of the need to target bordering pupils in order to further improve their progress. This will improve performance at upper outcomes and levels.

The school has effective arrangements for promoting healthy eating and drinking. Pupils assist with a range of initiatives including the organisation of the 'fruit tuck shop' and the sale of specially designed water bottles. There are many activities that promote health education, including the creation of fruit faces and posters to recommend eating a balanced diet.

The school's arrangements for safeguarding pupils meet requirements and give no cause for concern. All staff ensure that pupils know how to keep themselves safe online, for example by ensuring that they choose a safe password when using the internet.

The school has effective procedures to track pupils' progress. This enables teachers and pupils to agree appropriate targets for improvement, which they share effectively with parents. End-of-year reports to parents provide useful information on their children's progress and targets for the following year and meet requirements.

Leadership and Management

The headteacher, other leaders and staff have developed a shared vision and there is a very clear strategy to improve outcomes for all groups of learners. Leaders demonstrate a very strong capacity to plan and implement change and they engage all staff and other partners very effectively in the change process.

Self-evaluation is well established and is effective in contributing to improving standards, learning and teaching. As a result, many priorities within last year's school development plan (SDP) are achieved or have made strong and very good progress. Leaders and staff effectively use all available performance data and evidence about the quality of learning and teaching and pupils' work to identify strengths and set improvement priorities. However, all data analysis needs to be summarised for the self-evaluation report.

There is a well-established process for performance management of all staff. Senior leaders use the process effectively to support the professional development of staff and targets link strongly with the priorities in the school development plan.

The school is responding well to national and local priorities. Good examples include the implementation of the Welsh Language Charter and the Digital Competency Framework. These initiatives are having positive impact on pupils' standards in Welsh and ICT.

Governors have a very good understanding of the school's strengths and areas for improvement and are highly effective in supporting and challenging the school's performance.

Impact of the proposal on the above

Currently there are five English and four Welsh mainstream classes, with two age groups in majority of the classes. The children in the English classes are taught Welsh as a second language whilst the Welsh classes are taught through the medium of Welsh. There are 222 pupils on roll, 92 of whom are taught through Welsh, 130 through English and additional 40 of the pupils are taught in a special educational needs (SEN) centre.

The change in the nature of provision at Foundation Phase from Dual Stream to Welsh medium will ensure that the school is moving along the local authority's WESP continuum plan.

Appendix A – Community Impact Assessment

Ysgol Y Felin

Catchment Area Analysis – January PLASC 2020 Data

Each school has an area that it serves, referred to as the catchment area. Each school is expected to accommodate pupils from within its catchment area and schools must have regard for this ongoing demand.

Most parents send their child to their local school but parents have a right to state a preference for other schools.

Pupils attending the school from inside / outside the catchment

Based on January PLASC 2020 data, the geographical data in relation to the pupil distribution for Ysgol Y Felin catchment area indicated that of the 222 pupils on roll *(exc Special Unit)*, 91 lived within the catchment area, whilst the remaining 131 were from outside the catchment area.

Pupils living in the catchment area attending other schools.

Based on January PLASC 2020 data, 163 pupils lived within the Ysgol Y Felin catchment area attended other schools.

Taking into consideration the 91 pupils living within the catchment area attending Ysgol Y Felin, and the 163 pupils living within the catchment area but attending other schools, a total of 254 pupils are living within the catchment area of Ysgol Y Felin.

Other facilities or services provided by the school e.g. after school clubs/breakfast Club/community Library.

A number of clubs are offered at Ysgol Y Felin. The school has a breakfast club which is conducted through the medium of Welsh and English and which promotes a Welsh ethos celebrating the Welsh culture through listening to Welsh music and reading Welsh books and magazines. There is also an after school club run by Welsh speakers whereby various activities are provided for the pupils mainly through the medium of Welsh. On the school site there is a private/Mudiad Meithirn Nursery School which currently provides up to 30 hours of care and education for pupils from two years up through the medium of Welsh.

Other facilities the school provides e.g. club/play group/community Council

The school has established a wide range of partnerships that have a beneficial impact on pupils' wellbeing and attainment. Communication with parents is very good. The school provides them with many opportunities to support their children's learning, such as supporting their school work through the ICT network. Parents are supportive and staff and governors value their contributions to school life.

The school is at the heart of its community and pupils make good use of the locality to enrich their curriculum experiences, for example through visits to local places of worship, and places of work, such as the local water reservoir, Parc Y Sgarlets and Parc Howard.

The very strong links with the pre-school setting, located on site, ensures that younger pupils settle confidently into the school. Opportunities for the pre-school children to participate in language and play development sessions before starting school are particularly valuable.

There are effective transition programmes in place with the local secondary schools to ensure that pupils are well prepared to move on to the next phase in their education. The moderation work with the secondary schools and their feeder primaries ensures the reliability of end of key stage teacher assessments.

A strength of the school is its partnership with external specialist agencies to support vulnerable pupils and their families

Effect of the proposal on the school/community

The implementation of the Welsh Medium Foundation phase will ensure that the community of Felinfoel, Llanelli continues to thrive as a bilingual one and helps towards realising Wales 'national ambition of having a million Welsh speakers by 2050. The proposal will provide all pupils joining the school the opportunity to develop their Welsh language skills from an earlier age.

The community of Felinfoel, Llanelli is bilingual in nature. In order to ensure that pupils are able to benefit fully from the community that they belong to, it is vital that they have sound basic skills to be able to communicate informally in Welsh.

Appendix B – Welsh Language Impact Assessment

This proposal supports the Council's vision and aims for Welsh medium education as set out in Carmarthenshire's Welsh in Education Strategic Plan (WESP) 2017 – 2020. The proposal will allow greater opportunities for access to Welsh medium education within the Ysgol Y Felin School catchment area and will ensure linguistic continuity from the nursery sector along the key stages to the secondary sector so that every pupil becomes fluent and confident in both Welsh and English languages.

Language Category

Ysgol Y Felin is categorised as a Dual Stream Primary School.

Standards*

In Foundation Phase, pupils are assessed in different areas of learning. Based on 2019 data, 80.0% of pupils achieved at least Outcome 5 in 'Language, Literacy and Communication (in Welsh)'.

In Key Stage 2, pupils are assessed in each of the core subjects. Based on 2019 data, 100% of pupils achieved at least Level 4 in Welsh first language.

* No National Teacher assessments were conducted in 2020 due to the ongoing impact of the Coronavirus outbreak. For this reason, 2019 has been used.

After school activities which provide additional opportunities to use the Welsh language

The school takes an active role and pride in implementing the Welsh Charter scheme which ensures that pupils receive opportunities to use the Welsh language in informal ways. The school is also very active with the Urdd organisation arranging residential trips to their camps at Llangrannog annually for pupils from both streams, competing in many sporting activities through the medium of Welsh and taking an active part in the local Eisteddfod, regional and national Eisteddfod on an annual basis. Pupils from both streams also have opportunities to attend the Urdd Jambori. The school hosts activity clubs each week. The linguistic medium of those clubs is Welsh and through this they see that Welsh belongs in the context of art, sustainability, cooking, creative and sporting. The school often invites external companies to come and run drama workshops and to make performances for pupils. These performances and workshops are through the medium of Welsh so that pupils appreciate that Welsh is a living language.

Appendix C – Equalities Impact Assessment

Carmarthenshire County Council Assessing Impact

The Equality Act 2010

The Equality Act 2010 (the Act) brings together and replaces the previous anti-discrimination laws with a single Act. It simplifies and strengthens the law, removes inconsistencies and makes it easier for people to understand and comply with it. The majority of the Act came into force on 1 October 2010.

The Act includes a new public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011.

What is the general duty?

The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

The duties are legal obligations. Failure to meet the duties may result in authorities being exposed to legal challenge.

Under equality legislation, public authorities have legal duties to pay 'due regard' to the need to eliminate discrimination and promote equality with regard to race, disability and gender, including gender reassignment, as well as to promote good race relations. The Equality Act 2010 introduces a new public sector duty which extends this coverage to age, sexual orientation, pregnancy and maternity, and religion or belief. The law requires that this duty to pay 'due regard' be demonstrated in the decision making process. It is also important to note that public authorities subject to the equality duties are also likely to be subject to the obligations under the Human Rights Act and it is therefore wise also to consider the potential impact that decisions could have on human rights as part of the same process.

Carmarthenshire's approach to Equality Impact

In order to ensure that the council is considering the potential equality impact of its proposed policies and practices, and in order to evidence that we have done so, every proposal will be required to be supported by the attached Equality Impact Assessment. Where this assessment identifies a significant impact then more detail may be required.

Reporting on assessments

Where it is clear from the assessment that the likely impact on the authority's ability to meet the general duty is substantial, then it must publish a report.

Initial and Detailed Equality Impact Assessments

The initial EIA (appendix 1) is a simple and quick method of assessing the effect of a policy, function, procedure, decision including financial cuts on one or more of the protected characteristics.

The Service Manager responsible for the relevant new or revised policies, functions, procedures and financial decisions must undertake, at least, an initial EIA and where relevant a detailed Equality Impact Assessment (appendix 2); EIA must be attached as background paper with reports to Executive and Scrutiny.

Equality impact assessment - Process to follow where HR implications have been identified

Lead/service Manager to identify the policy, function, procedure or a change in Policy. Undertake an initial or detailed EIA. See appendix 1 and if there is a requirement go on to complete appendix 2 Organisational New HR Policy or HR policy change/restructure change EIA and proposed changes Circulate EIA with draft Policy to taken to change review panel strategic HR team for comment. for comment. Passed to the Policy and Partnership Team for approval (equalities@carmarthenshire.gov.uk) Amendments identified /further work to complete or referral to legal

Initial Equalities Impact Assessment Template

• The Well-being of Future Generations (Wales) Act 2015

Appendix 1

Department: Education & Children	Completed by (lead): Sara Griffiths		Date of initial assessment: November 2020			
			Revision Dates: July 2021			
Anna ta ha assassada (i.a. mama af maliau	This proposal is to show a	46 4	of manyining at Varial V Falia Drimany Cabaal			
Area to be assessed: (i.e. name of policy,	This proposal is to change the nature of provision at Ysgol Y Felin Primary School.					
function, procedure, practice or a financial						
decision)						
Is this existing or new function/policy, procedure, practice or			School Re-organisation Proposal – Modernising Education Programme			
decision?						
What evidence has been used to inform the	assessment and policy?	(please list	only)			
21 st Century Schools Programme						
 Modernising Education Programme 						
School Organisation Code 2018						
 PLASC Data 2020 						

1. Describe the aims, objectives or	The proposal aims to respond to WG 'A Million Welsh Speakers by 2050', Carmarthenshire County				
purpose of the proposed	Council's Welsh in Education Strategic Plan and the authority's vision for creating a bilingual				
function/policy, practice,	Carmarthenshire by increasing Welsh medium provision at Ysgol Y Felin.				
procedure or decision and who is					
intended to benefit.					
The Public Sector Equality Duty	2. What is the level of	3. Identify the risk or positive effect that	4. If there is a		
requires the Council to have "due	impact on each group/	could result for each of the	disproportionately negative		
regard" to the need to:-	protected characteristics in	group/protected characteristics?	impact what mitigating		
	terms of the three aims of				

harass (2) adv betwee (3) fos differen	ninate unlawful discrimination, ment and victimisation; vance equality of opportunity en different groups; and ter good relations between nt groups uidance notes)	the duty? Please indicate high (H) medium (M), low (L), no effect (N) for each.	Risks	Positive effects	factors have you considered?	
	Age	L	Neutral	Foundation Phase pupils will be immersed in the Welsh language.		
tics	Disability	L	ALN pupils will be supported appropriately as required.			
eris	Gender reassignment	N	Neutral			
ract	Race	N	Neutral			
Protected characteristics	Religion/Belief	N	Neutral			
	Pregnancy and maternity	N	Neutral			
	Sexual Orientation	N	Neutral			
	Sex	N	Neutral			
	Welsh language	L	Neutral	This proposal is to change the nature of provision in the Foundation Phase to Welsh medium which will support the Council's vision and		

							aims for Welsh		
							medium education as		
							set out in		
							Carmarthenshire's		
							Welsh in Education		
							Strategic Plan		
							(WESP) 2017-2020.		
	Any other area		L	Ne	utral		(VVLOI) 2011-2020.		
	7 my other area			INC	uliai				
				1					
	there been any cons ted characteristics?	uitation/engagen	nent with the appropriate	\/F0		_			
protec	ted characteristics?			YES	NO [
					<u>. </u>				
						1 12	-2 1 -20 d - 11 10	Land Otalian L. Daniela and Maria	
					The Project Officer has liaised with the Headteacher, Staff and Parents of Ysgol				
				Y Felin	Y Felin primary School with regards to the proposal. All stakeholders will be fully				
					consulted during the formal consultation period.				
6. Wha	t action(s) will you ta	ake to reduce any	/ disproportionately negative	impact, if a	ny? Ens	ure that a	III key stakeholders are f	ully informed throughout the	
	ory process.	-		•	_		•	, c	
7. Proc	urement								
Follow	ing collation of evide	ence for this asse	essment, are there any procur	ement imp	lications	to the activ	vity, proposal, service. N/A		
Please	take the findings of	this assessment	into your procurement plan. (Contact the	corporat	e procure	ment unit for further advice	e.	
8. Hum	an resources								
Following collation of evidence for this assessment, are there any Human resource implications to the activity, proposal or service? As there will be a change in									
the nature of provision, additional staffing may be required. However, this will be addressed as the scheme progresses and Human Resources will									
be full	y consulted.								
9. Base	ed on the information	n in sections 2 ar	nd 6, should this						
function/policy/procedure/practice or a decision proceed to Detailed YES				YES		NO _	٦		
Impact	Assessment? (recor	nmended if one o	r more H under section 2)			Х			
Approv	/ed by:	Simon Davies		1	Date: No	ovember 2	020		
	f Service								