

Caerphilly County Borough Council - Integrated Impact Assessment

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

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

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

1. Proposal Details			
Lead Officer	Head of Service	Service Area & Department	Date
Andrea West	Sue Richards	21 st Century Schools, Education and Corporate Services	23/07/2021

Is this proposal a... (please tick relevant box)			
Policy	<input type="checkbox"/>	Strategy / Plan	<input type="checkbox"/>
Practice	<input type="checkbox"/>	Procedure	<input type="checkbox"/>
Restructure	<input type="checkbox"/>	Project	<input checked="" type="checkbox"/>

What is the proposal to be assessed? <i>Provide brief details of the proposal and provide a link to any relevant report or documents.</i>
<p>21st Century Schools and Colleges Programme - Band B Phase 2 – Centre for Vulnerable Learners (Pupil Referral Unit) at Pontllanfraith (Old Pont Grammar School site)</p> <p>Schools in Wales need to be in good condition and suitable for the delivery of education. In some cases, schools can be modernised, repaired, refurbished, extended, or partially rebuilt to meet the standards needed for contemporary teaching and learning. However, some existing schools are no longer in the right place and in such cases, we might propose new schools or changes to existing schools.</p> <p>CCBC aspires to continue to raise school standards and improve the quality of the learning environment to create fit-for-purpose 21st century schools and give every child in Caerphilly the best possible start in life. The 21st Century Schools and Colleges programme is a</p>

major, long-term, strategic capital investment programme. It is jointly funded by the Welsh Government and local authorities and aims to create a generation of 21st century schools in Wales.

The Centre for Vulnerable Learners (Pupil Referral Unit), at Pontllanfraith and has been identified as one of the priority projects in the 21st Century Schools Band B programme.

A Pupil Referral Unit will be designed as per the guidance in Annex 5 of the Inclusion and Pupil Support Guidance issued by Welsh Government in March 2016 and the legal framework laid out in the Education (Pupil Referral Units) (Management Committees etc.) (Wales) Regulations 2014 on 31 October 2014 except for regulations 22 (delegation of functions) and 23 (curriculum) which came into force on 23 February 2015.

The aim is to provide a Centre for vulnerable pupils (CVL), accessible by pupils from across Caerphilly along with community use of the facilities outside school hours.

Please note: The terms PRU and CVL are used interchangeably for the purposes of this document

We are proposing to:

- **Create a Pupil Referral Unit for vulnerable pupils on the former Pontllanfraith Comprehensive site (NP12 2DA) with an anticipated completion date of September 2023.**
- The proposed centre of excellence will support vulnerable learners from across Caerphilly at Key Stage 3/4, sitting at the centre of the Council's Education Other Than At School (EOTAS) Strategy and the [Cwmpawd hub and spoke model](#)
- The new facility will accommodate between 80 - 120 pupils and be equipped with high quality learning opportunities, indoor and outdoor sporting provision as well as access to first class support and will enable community use of the facilities outside of school hours

Unlike other 21st Century Schools proposals which have been undertaken to date, the School Organisation Code 2018 legislation does not apply to pupil referral units and as such the consultation process prescribed by the School Organisation Code 2018 does not apply in this instance

However, for the purposes of progressing this proposal and to enable transparent, balanced and open decision making, a consultation process will be undertaken and reflect the principles of the Council's Consultation and Engagement Framework 2020-2025. Utilising the "Spectrum of Engagement" approach, an appropriate level of engagement in informing and consulting stakeholders will be undertaken, mirroring the equivalent processes outlined in Section 3 of the School Organisation Code 2018 only.

Further information is available on the [21st Century Schools webpages](#)



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

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

Protected Characteristics	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Age <i>(people of all ages)</i>	<p>Positive The proposal seeks to cater for pupils aged 11 -16 and with plans to support community usage, it therefore has the potential to benefit all age ranges.</p> <p>Positive The proposal allows for an increase in the number of spaces, between 80 and 120, for vulnerable pupils from across Caerphilly in the 3-16 age bracket in response to rising demand for this type of provision.</p> <p>Positive The proposal includes the development of a centre of</p>	<p>The Council acknowledges the importance of the Learner Travel. The site identified for the development of the Centre for Vulnerable Learners is the former English Medium Secondary Grammar School site at Pontllanfraith. The safety of children is of paramount importance and the Learner Travel (Wales) Measure 2008 requires local authorities to assess the suitability of travel for learners between home and places of education and training. It is the intention of the Authority to provide a system of transport that will seek</p>	<p>CCBC EOTAS strategy</p> <p>This sets out the revised strategy for EOTAS under the Cwmpawd model of hub and spoke. The aspiration is that the proposed new Centre for Vulnerable Learners will become the hub of the Cwmpawd model.</p> <p>Within this model there will be a discrete provision for younger learners at The Learning Centre, Glanynant. The CVL will therefore cater more for older key stage 3 and 4 learners alongside other spoke provisions.</p>

	<p>excellence for staff development thus extending the benefits of the centre to a broad range of adult professionals.</p> <p>Positive This proposal, by providing additional places, will allow for intervention at an earlier age thereby increasing the chances of successful outcomes for the pupils.</p> <p>Positive With the possibility of earlier intervention the proposal also brings the opportunity for greater continuity of provision. This stability of provision will also increase the chances of successful outcomes for the pupils.</p> <p>Positive Through the proposed hub (CVL) and spoke provision, pupils will be supported to increasingly speak Welsh as part of their everyday routine, improving their potential education and career prospects and allowing pupils to realise the value of the language.</p> <p>Negative</p>	<p>to ensure pupils can safely and comfortably access their education. The proposed location was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, lighting and designated footpaths.</p> <p>Those that attend, work and use the building will benefit from a fit for purpose, innovative 21st Century facility. In addition, the proposal intends to extend access at the new premises to include community use and excellent professional development opportunities. To this end the design process will seek to include measures to enable safe use of the new facilities once the curriculum needs of pupils have been met. The Wi-Fi and Information Technology infrastructure will be established to support public access and community use. The use of sporting facilities will also be available for the community at suitable times in keeping with the curriculum timetable.</p> <p>The Authority has recognised the opportunity that this proposal presents in enabling the enhanced</p>	<p><u>Estyn remit report on EOTAS - 2016</u></p> <p>Contains 9 recommendations for local authorities.</p> <p><u>Pupil Level Annual School Census (PLASC)</u></p> <p>Statistical Information relating to the numbers of pupils at local authority level and EOTAS enrolment:</p> <p>Caerphilly Region Figures (2018/19 data set)</p> <ul style="list-style-type: none"> • Pupils with single EOTAS enrolment - 85 • Pupils with subsidiary mainstream enrolment as well – 30 • Rising numbers of referrals to EOTAS • A shift from dual registration to single registration with EOTAS rather than dual with mainstream school • The current number of learners in EOTAS (February 2021) is 267 • Based on current trends and the potential longer term impact of Covid-19 lockdown, it
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	<p>The proposal seeks to develop the Cwmpawd model of hub and spoke provision with the CVL as the hub at the former grammar school at Pontllanfraith. This may result in additional travel for pupils in certain age groups dependent on their current home location relative to current provision.</p> <p>Negative The proposal seeks to develop the Cwmpawd model of hub and spoke provision with the CVL as the hub at the former grammar school at Pontllanfraith which may result in additional travel for staff dependent on their current home/work location and travel to work arrangements.</p>	<p>facilities to be available to the local community after school hours. The current school site is not in use but will become available to the community and allow adults and young people to participate in a number of activities and make use of the enhanced facilities with full DDA compliance.</p> <p>The Authority will look to minimise any adverse effects that the redevelopment of the disused school site may have on local residents.</p>	<p>is expected that future demand may rise to 290-300</p>
<p>Disability (<i>people with disabilities/ long term conditions</i>)</p>	<p>Positive The proposed remodelling of the former grammar school site will ensure that it is as close to BREAM compliant as possible and with full access for people of all ages with disabilities.</p> <p>Positive The proposal seeks to provide more opportunities for pupils to develop their Welsh Language skills than exist under the current EOTAS arrangements. This includes recruiting staff with Welsh language skills to the more centralised provision detailed in the proposal.</p>	<p>The Council acknowledges the importance of the Learner Travel. The site identified for the development of the Centre for Vulnerable Learners is the former English Medium Secondary Grammar School site at Pontllanfraith. The safety of children is of paramount importance and the Learner Travel (Wales) Measure 2008 requires local authorities to assess the suitability of travel for learners between home and places of education and training. It is the intention of the Authority to provide a system of transport that will seek to ensure pupils can safely and</p>	<p><u>Well-being of Future Generations (Wales) Act 2015</u></p> <p>The Act puts in place seven well-being goals which the local authority must work to achieve.</p> <ul style="list-style-type: none"> • A Prosperous Wales • A Resilient Wales • A More Equal Wales • A Healthier Wales • A Wales of Cohesive Communities

	<p>Negative Proposal seeks to centralise provision from existing locations to the site of the former grammar school at Pontllanfraith which may result in additional travel for pupils in certain age groups dependent on their current home location from current provision.</p> <p>Negative Proposal seeks to centralise provision from existing locations to the site of the former grammar school at Pontllanfraith which may result in additional travel for staff dependent on their current home/work location and travel to work arrangements.</p>	<p>comfortably access their education. The proposed location was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, lighting and designated footpaths.</p>	<ul style="list-style-type: none"> • A Wales of Vibrant Culture and Thriving Welsh Language • A Globally Responsible Wales <p><u>CCBC EOTAS strategy</u></p> <p>This strategy highlights the importance placed on Cefnogaeth (Support) in order to underpin the wellbeing of EOTAS learners.</p> <p><u>The Disability Pay Gap</u> (EHRC 2017).</p> <p>Equality and Human Rights Commission data shows that people with physical impairments generally experience pay gaps in the range of 15% to 28% depending on disability. Men with learning disabilities have a pay gap of around 60%. Disabled people are less likely to be in employment and more likely to be on lower pay than non-disabled people.</p>
<p>Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i></p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics</p>	<p>Not applicable</p>

Marriage or Civil Partnership (<i>people who are married or in a civil partnership</i>)	Neutral No impact	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable
Pregnancy and Maternity (<i>women who are pregnant and/or on maternity leave</i>)	Neutral No impact	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable
Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)	Neutral No anticipated change	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	Neutral No anticipated change	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	Neutral No anticipated change	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable
Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual</i>)	Neutral No anticipated change	Not applicable because the facility is accessible to pupils and the wider community regardless of other specific protected characteristics	Not applicable

3. Socio-economic Duty (Strategic Decisions Only)

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

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

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

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
	<p>Positive Providing educational facilities fit for the future will improve the education and life outcomes of the present and future pupils who need the particular provisions provided by EOTAS in the new Centre for Vulnerable Learners.</p> <p>Positive The new Centre aims to provide earlier intervention, greater continuity of education (and thereby improved progression) and a bespoke curriculum offer. These aim to increase the capability of the learners to be knowledgeable and reduce the degree of inequality of outcome in this area of Education.</p> <p>Positive</p>	Not applicable	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act¹⁶ in Wales – the Socio-economic Duty.</p> <p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.</p>

<p>Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>The proposed Centre for Vulnerable Learners will be fully accessible to pupils whose needs cannot be met within a mainstream school setting regardless of Low Income / Income Poverty</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p>	<p>In this instance the main consideration of inequality of outcome as a result of socio-economic disadvantage is “Education – the capability to be knowledgeable”</p> <p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales 11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for <u>Income</u> and <u>Overall</u> factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for <u>Education</u>.</p> <p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC and
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			<p>Wales compared with 49% amongst EOTAS learners</p> <ul style="list-style-type: none"> Currently the take-up amongst EOTAS learners is 42% <p>When the registered addresses of EOTAS learners is compared to the Lower Output Social Areas (LSOAs) across Caerphilly there is a high correlation with the most disadvantaged communities.</p> <ul style="list-style-type: none"> In 2020 49% of EOTAS learners were domiciled in the top 30 (out of 110) most socially disadvantaged LSOAs The figure for 2021 is 48% <p><u>Estyn remit report on EOTAS - 2016</u></p> <p>Contains 9 recommendations for local authorities.</p> <p><i>“There are many reasons why pupils receive EOTAS. Mostly, they have been excluded from school, are refusing to attend school, or have very challenging behaviour associated with social and emotional behavioural difficulties. As a result, they have often missed extended periods of education and have gaps in their learning. These pupils often have low self-esteem and lack confidence. Many have low aspirations for their future.”</i></p>
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<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p>Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)</p>	<p>Positive The proposed Centre for Vulnerable Learners will be fully accessible to pupils whose needs cannot be met within a mainstream school setting regardless of Low and / or No Wealth</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p>	<p>Not applicable</p>	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act¹⁶ in Wales – the Socio-economic Duty.</p> <p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.</p> <p>In this instance the main consideration of inequality of outcome as a result of socio-economic disadvantage is “Education – the capability to be knowledgeable”</p>

			<p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018)</p> <p>Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales</p> <p>11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Income and Overall factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Education.</p> <p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC compared with 49% amongst EOTAS learners • Currently the take-up amongst EOTAS learners is 42% <p>When the registered addresses of EOTAS learners is compared to the Lower Output Social Areas (LSOAs)</p>
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			<p>across Caerphilly there is a high correlation with the most disadvantaged communities.</p> <ul style="list-style-type: none"> • In 2020 49% of EOTAS learners were domiciled in the top 30 (out of 110) most socially disadvantaged LSOAs • The figure for 2021 is 48%
<p>Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)</p>	<p>Positive It is a pre-requisite of Welsh Government funding that Council's optimise the use of infrastructure and resources to enable flexibility for space and facilities to be made available as community assets. The proposals for the new Centre will support community access after school hours.</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p>	<p>Not applicable</p>	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act¹⁶ in Wales – the Socio-economic Duty.</p> <p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.</p> <p>In this instance the main consideration of inequality of outcome</p>

			<p>as a result of socio-economic disadvantage is “Education – the capability to be knowledgeable”</p> <p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales 11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Income and Overall factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Education.</p> <p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC compared with 49% amongst EOTAS learners
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<p>Area Deprivation (<i>where you live (rural areas), where you work (accessibility of public transport)</i>)</p>	<p>Positive The design process will seek to include measures to enable safe use of parts of the redeveloped school building which would be made available for community use at suitable times in keeping with the curriculum timetable. It will also strengthen and safeguard the promotion of inclusivity and wellbeing within the Community.</p> <p>Positive Procurement will include Community Benefits as a core requirement e.g. around local targeted recruitment and training, supply chains, community and education initiatives in the provision of the proposed new facility.</p>	Not applicable	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act16 in Wales – the Socio-economic Duty.</p> <p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the</p>

	<p>Positive The facility will provide inclusive facilities which will be accessible to vulnerable children and young people supporting their holistic needs and their future wellbeing. When the site is being used by the community they will be able to access the facilities regardless of requirements.</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p>	<p>inequalities of outcome resulting from socio-economic disadvantage.</p> <p>In this instance the main consideration of inequality of outcome as a result of socio-economic disadvantage is “Education – the capability to be knowledgeable”</p> <p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales 11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Income and Overall factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Education.</p> <p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC
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<p>Socio-economic Background (social class i.e. parents education, employment and income)</p>	<p>Positive Facility is accessible to pupils and the wider community regardless of area deprivation.</p> <p>Positive The proposed redevelopment would include community usage to support the wider community.</p> <p>Positive The proposed Centre for Vulnerable Learners will be fully accessible to pupils whose needs cannot be met within a mainstream school setting</p>	<p>Not applicable</p>	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act16 in Wales – the Socio-economic Duty.</p>

	<p>regardless of socio-economic background.</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p> <p>Positive The facility will provide inclusive facilities which will be accessible to vulnerable children and young people supporting their holistic needs and their future wellbeing.</p>		<p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.</p> <p>In this instance the main consideration of inequality of outcome as a result of socio-economic disadvantage is “Education – the capability to be knowledgeable”</p> <p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales 11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Income and Overall factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Education.</p>
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			<p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC compared with 49% amongst EOTAS learners • Currently the take-up amongst EOTAS learners is 42% <p>When the registered addresses of EOTAS learners is compared to the Lower Output Social Areas (LSOAs) across Caerphilly there is a high correlation with the most disadvantaged communities.</p> <ul style="list-style-type: none"> • In 2020 49% of EOTAS learners were domiciled in the top 30 (out of 110) most socially disadvantaged LSOAs • The figure for 2021 is 48%
<p>Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>Positive It is a pre-requisite of Welsh Government funding that Council's optimise the use of infrastructure and resources to enable flexibility for space and facilities to be made available as community assets. This will be included in this proposal for a Centre for Vulnerable Learners at Pontllanfraith.</p>	<p>The Council continuously improves the quality of school buildings through the Capital Investment Programme..</p> <p>The proposal is to relocate existing EOTAS provision and provide additional capacity on site of up to a</p>	<p><u>Wales Act 2017 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010 - Public sector duty regarding socio-economic inequalities</u></p> <p><u>Equality Act 2010</u></p> <p>Section 45 of the Wales Act 2017, amends Part 1 of the Equality Act, 2010 to give Welsh Ministers the</p>

	<p>Positive The proposal aims to provide a centralised but accessible, sustainable provision to meet the growing demand for EOTAS provision across the CCBC area.</p> <p>Positive This proposal aims to improve the opportunities for EOTAS learners to enhance their use of the Welsh Language.</p> <p>Positive In considering the distribution of EOTAS learners across CCBC it is clear that around half come from the top third of the most disadvantaged communities as judged by data from the LSOAs. The proposed CVL will therefore have a greater proportionate benefit to learners from disadvantaged backgrounds.</p> <p>Negative Proposal seeks to centralise provision from existing locations to the site of the former grammar school at Pontllanfraith which may result in additional travel for pupils in certain age groups dependent on their current home location from current provision.</p>	<p>maximum of 120 places on the site of the former grammar school at Pontllanfraith.</p> <p>The Council acknowledges the importance of the Learner Travel. The site identified for the development of the Centre for Vulnerable Learners is the former English Medium Secondary Grammar School site at Pontllanfraith. The safety of children is of paramount importance and the Learner Travel (Wales) Measure 2008 requires local authorities to assess the suitability of travel for learners between home and places of education and training. It is the intention of the Authority to provide a system of transport that will seek to ensure pupils can safely and comfortably access their education. The proposed location was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus</p>	<p>power to commence this Duty in Wales. The Welsh Ministers have used this power to commence Sections 1 to 3 of the 2010 Act¹⁶ in Wales – the Socio-economic Duty.</p> <p>The Duty places a legal responsibility on bodies when they are taking strategic decisions to have due regard to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage.</p> <p>In this instance the main consideration of inequality of outcome as a result of socio-economic disadvantage is "Education – the capability to be knowledgeable"</p> <p><u>Is Wales Fairer? – The state of equality and human rights</u> (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u></p> <p>CCBC has 110 Lower Layer Super Output Areas (LSOAs) which account for 5.8% of the total for Wales</p>
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		points, lighting and designated footpaths.	<p>11 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Income and Overall factors. 14 of the CCBC LSOAs are among the 10% most deprived LSOAs in Wales for Education.</p> <p>Learners registered with EOTAS are over twice as likely to be in receipt of free school meals (FSM) compared to the proportion for CCBC as a whole.</p> <ul style="list-style-type: none"> • In 2020 the overall take-up of FSM was 20% across CCBC compared with 49% amongst EOTAS learners • Currently the take-up amongst EOTAS learners is 42% <p>When the registered addresses of EOTAS learners is compared to the Lower Output Social Areas (LSOAs) across Caerphilly there is a high correlation with the most disadvantaged communities.</p> <ul style="list-style-type: none"> • In 2020 49% of EOTAS learners were domiciled in the top 30 (out of 110) most socially disadvantaged LSOAs • The figure for 2021 is 48%
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4. Corporate Plan – Council’s Well-being Objectives

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

Objective 1 - Improve education opportunities for all

Positive

This proposal seeks to secure equality of access to education by supporting the development of a Centre for Vulnerable Learners at the heart of a hub and spoke model of EOTAS provision. There is a commitment to providing the best possible quality of education and services for learners who need EOTAS provision. Caerphilly currently has a range of provision spread across the County some of which is externally procured. The establishment of this new fit-for-purpose Centre for Vulnerable Learners is expected to reduce the dependence on externally procured provision creating an opportunity to improve the financial efficiency of provision and improve the ability to deliver through the medium of both English and Welsh.

The Centre will also provide 80 -120 additional EOTAS places to enable CCBC to meet the rising demand for this type of provision.

The Centre will also be developed as a Centre of Excellence for the professional development of staff thus ensuring the highest quality of provision.

The Centre, as part of the Cwmpawd model, will also enable earlier interventions to be made and provide for improved continuity and progression, all of which will contribute to better outcomes for learners.

Therefore the investment is required to future-proof the educational outcomes and meet the growing demand.

Positive

The proposal seeks to strengthen the promotion of the Welsh language, within the Centre supporting the increase use of the Welsh language amongst EOTAS children and young people and improve their awareness of the value of Welsh.

Negative

Proposal seeks to centralise some provision from existing locations to the site of the former grammar school at Pontllanfraith which may result in additional travel for pupils in certain age groups dependent on their current home location from current provision.

	<p>However, The Council acknowledges the importance of the Learner Travel Measure. The site identified for the development of the Centre for Vulnerable Learners is the former English Medium Secondary Grammar School site at Pontllanfraith. The safety of children is of paramount importance and the Learner Travel (Wales) Measure 2008 requires local authorities to assess the suitability of travel for learners between home and places of education and training. It is the intention of the Authority to provide a system of transport that will seek to ensure pupils can safely and comfortably access their education. The proposed location was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, lighting and designated footpaths.</p>
Objective 2 - Enabling employment	<p>Positive</p> <p>As part of the funding requirements for all 21st Century School proposals, Welsh Government stipulates that Community Benefits are a core requirement of any procurement process related to the award of contracts and will therefore be scored as part of the Quality evaluation. These include a number of targets around local recruitment and training, supply chains, community and education initiatives.</p>
Objective 3 - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's well-being	<p>Not applicable to this proposal</p>
Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment	<p>Neutral</p> <p>There is a Statutory duty placed upon the Council to provide pupils with free transport to their nearest suitable school if they reside beyond 'walking distance' to that school. All pupils are assessed in accordance with the Learner Travel (Wales) Measure 2008. However, the Council does offer a more generous policy than that statutorily required by the Measure.</p> <p>Positive</p> <p>The site identified for the development of a Centre for Vulnerable Learners was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, lighting and designated footpaths.</p>

<p>Objective 5 - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015</p>	<p>Positive</p> <p><u>Well-being of Future Generations (Wales) Act 2015</u></p> <ul style="list-style-type: none"> • A Prosperous Wales • A More Equal Wales • A Wales of Vibrant Culture and Thriving Welsh Language <p>Positive</p> <p>The current EOTAS provision is spread across the County and some is externally sourced with variations in cost and quality. This proposal for a Centre for Vulnerable Learners will provide a stimulating teaching and learning environment with 21st Century facilities including improved ICT and sport facilities and extended access provision for community use, centred on the learning, self-esteem and wellbeing of all.</p> <p>Positive</p> <p>Providing educational facilities fit for the future will improve the education and life outcomes of the present and future pupils who need EOTAS provision. The facility will be fully accessible to people with learning disabilities regardless of any specific socio-economic disadvantage, enabling children accessing the Centre to thrive, with the knock-on positive effect for the children and their families across the County.</p>
<p>Objective 6 - Support citizens to remain independent and improve their well-being</p>	<p>Positive</p> <p>The Council acknowledges that some learners require an educational provision outside of the normal mainstream setting. It also recognises that there is an inherent danger of there being a gap in outcomes between learners in mainstream and those that are EOTAS. The development of the Centre for Vulnerable Learners is designed to ensure that such a gap does not exist by enabling earlier intervention, greater continuity of provision, a bespoke curriculum and the development and sharing of best practice through a Centre of Excellence for staff professional development.</p>

4a. Links to any other relevant Council Policy

(How does your proposal deliver against any other relevant Council Policy?)

The proposal contributes the following Strategies:

- **Shared Ambitions Strategy (2019-2022)**

This proposal will deliver upon the Council's ambition to provide every learner with the best life chances through the provision of high quality teaching, learning and leadership across our impressive 21st Century school settings.

- **Caerphilly Welsh in Education Strategic Plan (2018 – 2020)**

The Council's commitment to Welsh medium education development is a priority as evidenced in Band B of the Welsh Government's 21st Century Schools programme. The Council's vision is to secure equality of access by promoting and supporting the development of inclusive education and giving a commitment to providing the best possible quality of education and services within available resources. Furthermore, in equipping schools and education providers the aim is to increase standards in Welsh and promote the use of the Welsh language within families, communities and workplaces.

- **Caerphilly Welsh Language Strategy**

The baseline for the strategy is the current language profile of the borough. According to the 2011 Census, Caerphilly county borough had 19,251 Welsh speakers (11.2% of the population) with a further 12% less fluently, and according to the Pupil Level Annual School Census figures from January 2016, 16.9% of the primary school population and 12.7% of the secondary school population were in Welsh medium education. This strategy therefore proposes a minimum 3% target increase in the number of Welsh speakers between 2017 and 2022. This target therefore means that by the 2021 Census, Caerphilly county borough will have a minimum 14.2% Welsh speaking population. This proposal will support future parental preference for Welsh medium education moving forward.

- **Caerphilly Strategic Equality Plan**

A statutory document under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, this four-year plan explains in straightforward terms what each of the equalities issues actually means and under what wider legislation we have responsibilities as a council. It highlights links to legislation and regulations covering the Welsh Language Standards and Human Rights issues and how it supports 4 of the 7 aims of Welsh Government's Well-being of Future Generations (Wales) Act 2015; A healthier Wales, A more equal Wales, A Wales of cohesive communities and A Wales of vibrant culture and thriving Welsh language.

- **CCBC Decarbonisation Strategy**

CCBC has an excellent track record of implementing initiatives that benefit the environment. The authority has reduced carbon emissions by investing in technologies that reduce consumption and we have worked hard to raise awareness of the importance of carbon reduction


with our staff, pupils and residents across the county borough. Proposals will consider how best to deliver this agenda as part of the build process and future operational matters.



The utilisation of this new Integrated Impact Assessment design will further help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:



- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- The Wales Act 2017
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

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

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

Ways of Working	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Term</p> 	<p>Through its own self-evaluative process the Council has recognised that the current EOTAS provision does not provide value for money and is a fragmented service provision with little or no capacity to deliver through the medium of Welsh. This proposal will centralise, expand and significantly improve EOTAS facilities. It will increase the capacity of in-house EOTAS provision, reduce the amount of travel across the county borough and improve the opportunities for Welsh medium provision.</p> <p>It is the Council's aim, wherever possible, to educate all pupils within Council settings. This prevents the need for out-sourcing provision which can be a more expensive option. Future expenditure projections indicate a re-direction of resources away from externally procured provision and agencies towards the staffing of the new CVL rather than any overall savings. This shift will, however, be viewed as better value for money due to the increase in number of places, the improvement in outcomes, the curriculum that can be offered and improvements in the monitoring of provision.</p> <p>The proposal will benefit pupils across the whole of the County Borough as the additional facilities and adaptations will support children and young people who have specialist needs in an appropriate and modern environment that will create a holistic approach towards learning and development.</p>

	<p>The proposed Centre will increase the number of places available in EOTAS provision and will help the Council to meet the rising demand for this type of provision. Shifting the emphasis to internal provision and away from externally procured provision may reduce per capita costs and thus support a higher number of places to meet demand. This should ensure that all those vulnerable learners who need to access EOTAS provision will, in the future, have their needs met.</p> <p>With the Centre at the heart of the Cwmpawd hub and spoke model, the aim is to provide a flexible framework of provision to meet the curriculum needs of a wide range of learners.</p>
<p>Prevention</p> 	<p>Children and young people who may require provision outside of school (EOTAS) are some of our most vulnerable learners. These children and young people often come from chaotic and challenging backgrounds. They can frequently experience family breakdown and mental health issues and are often exposed to substance misuse and domestic violence. It is no surprise, therefore, that these children and young people often have less positive learning outcomes than their peers.</p> <p>Currently, there is provision within Caerphilly as well as access to procured external providers. This provision can vary considerably in terms of cost and quality. Through our self-evaluation, we have concluded that current provision could be further developed and enhanced in order to improve pupils' outcomes and value for money.</p> <p>By improving outcomes for these learners the Council aims to reduce the number of young people who, at age 16, become not engaged in employment, education or training (NEET) and are instead able to progress on learning pathways towards a positive career, personal wellbeing and have the ability to contribute to society rather than relying on the benefit system.</p> <p>The aspiration as always, is to provide a good quality service to young people, with an ambition that they should feel important and safe within their learning environment.</p>
<p>Integration</p> 	<p>The proposal to develop a new Centre for Vulnerable Learners, as a key component in the Cwmpawd hub and spoke model, will respond to the Caerphilly PSB objective of giving young people the best start in life by providing a specific provision for learners who find mainstream settings do not meet their particular needs. It also links across to the CCBC Corporate objectives of "Improve education opportunities for all", "Enabling employment" and "Support citizens to remain independent and improve their well-being". This proposal also links to the Wellbeing Goals of "A prosperous Wales" and "A more equal Wales".</p>
<p>Collaboration</p>	<p>The Council has worked with staff in schools and across the LA to develop an EOTAS strategy for Caerphilly to which this proposal makes a significant contribution. The Council has also worked with partners to provide community use opportunities from the redevelopment of the former grammar school site at Pontllanfraith. A cross-departmental working group consisting of representatives from the 21st Century Schools Team, Education Directorate, Sport and Leisure,</p>

	<p>Inclusion Services, Property Services, Finance and Health and Safety has worked through the options process from long-listing to recommending a way forward as per this proposal.</p>
<p>Involvement</p> 	<p>This proposal does not fall under the requirements of The School Organisation Code (2018). The consultation will be run under the CCBC “Consultation and Engagement Framework” and “Spectrum of Engagement”. A multi-media consultation approach will be developed informed by the guidance in the CCBC Framework. The consultation process will mirror those outlined in Section 3 of the School Organisation Code 2018.</p> <p>Planning Consultation There will be a separate planning application process that will address a number of material planning considerations. This process will enable further involvement and engagement opportunities for interested parties.</p>

6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Prosperous Wales <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>A skilled and well-educated workforce enables individuals to lead successful lives and contribute to the wider economy.</p> <p>This proposal supports this Well-being goal by:</p> <p>Embodied Carbon / Operational Carbon The 21st Century Schools Band B Programme looks to deliver a combination of new school builds, expansions, amalgamations, relocations and refurbishments, all with the potential to support the Welsh Government and Council’s strategies on decarbonisation and provide a new model of delivery. As such, skilled and knowledgeable workforce sectors will be engaged to deliver this outcome.</p> <p>Future Prospects: Children and young people who may require provision outside of school (EOTAS) are some of our most vulnerable learners. These children and young people often come from chaotic and challenging backgrounds. They can frequently experience family</p>

	<p>breakdown and mental health issues and are often exposed to substance misuse and domestic violence. It is no surprise, therefore, that these children and young people often have less positive learning outcomes than their peers. The proposal to develop a Centre for Vulnerable Learners with the clear objective of improving the educational outcomes for EOTAS learners will therefore support the future prospects of the young people themselves as well as Wales as a whole. Key to this will be the development of life skills in the young people that will enable them to enter and sustain their place in the workforce and in society.</p>
<p>A Resilient Wales <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Young people who have developed positive wellbeing and healthy lifestyles will be better able to cope with the changes that the future will bring and thereby make Wales a more resilient nation.</p> <p>This proposal supports this Well-being goal by:</p> <ul style="list-style-type: none"> • Refurbishing an existing unused building on a brown field site and bringing it back into use • Eradicating dilapidated building stock and bringing it up to date fit for functioning in the 21st century including making it more energy efficient • Including the development of a multi-use games area and bespoke facilities which through school and community use will support wellbeing and the development of healthy lifestyles
<p>A Healthier Wales <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>Enabling people to develop healthy lifestyles and positive wellbeing has positive long term benefits for their own health and for society in general.</p> <p>This proposal supports this Well-being goal by:</p> <p>The Centre for Vulnerable Learners: The current EOTAS provision does not meet current/predicted demand either in numbers, suitability of facilities or effective use of resources/value for money. There are currently 267 learners registered with EOTAS, receiving their education at a variety of locations included out-sourced provision. In the future numbers are projected to rise to around 290/300.</p>

	<p>The proposed new Centre will accommodate 80 – 120 learners which will allow the overall capacity of EOTAS provision to be increased thus providing a sufficiency of tailored educational provision to meet the needs of many of the County’s most vulnerable learners; this will have a significant impact on their wellbeing; the tailored curriculum, in line with the Curriculum for Wales, will include a significant emphasis on sport and health.</p> <p>The proposal for a remodelled, fit for purpose Centre will provide a stimulating teaching and learning environment with 21st Century facilities including improved ICT facilities, centred on the learning, self-esteem and well-being of all pupils and improve the standard of delivery through a Centre of Excellence for staff professional development. The new building will have improved learning spaces and offer external and internal sport areas, specialist expressive arts and digital media suites alongside the partnering health facilities.</p> <p>The use of sporting and other facilities will be available for the community at suitable times in keeping with the curriculum timetable.</p>
<p>A More Equal Wales <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>Everyone in Wales should be able to live their lives and achieve their potential.</p> <p>This proposal supports this Well-being goal by:</p> <p>As indicated earlier many of the children and young people registered with EOTAS often come from chaotic and challenging backgrounds. They can frequently experience family breakdown and mental health issues and are often exposed to substance misuse and domestic violence. It is no surprise, therefore, that these children and young people often have less positive learning outcomes than their peers. This proposal for a Centre for Vulnerable Learners that is designed to meet the needs of these learners directly addresses the Wellbeing goal of a “More Equal Wales” by providing the tailored support and learning needs of these learners that cannot be met through mainstream schools.</p> <p>Community Use: Those that attend, work and use the building will benefit from a fit for purpose, innovative 21st Century facility. In addition, the proposal intends to extend access at the remodelled premises to include community use provision.</p>

	<p>As part of the 21st Century School remit, consideration must be given for the Centre to benefit from enabling the facilities to be shared with the wider community. The proposed project will take into account the desire to encourage and facilitate community use of the asset. To this end the design process will seek to include measures to enable safe access to the facilities. The Wi-Fi and Information Technology infrastructure will be established to support public access and community use. The use of sporting facilities will also be considered for the community at suitable times in keeping with the curriculum timetable.</p> <p>Impact on other schools:</p> <p>Increasing the overall number of available places by 80-120 will allow the Centre to respond to the increasing demand for EOTAS. This will not only meet the needs of the learners but also take the pressure of mainstream settings that may have been finding it difficult to meet the specific needs of these learners.</p>
Well-being Goals	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i></p>	<p>The education of all young people, irrespective of need, should be seen as being inclusive; local communities will benefit from the investment in the 21st century schools programme; both these propositions underpin the sense of belonging and cohesion in communities across Caerphilly.</p> <p>This proposal supports this Well-being goal by:</p> <p>The Council believes that this proposal represents an excellent opportunity to safeguard and sustain educational standards among EOTAS learners for the future and provides a platform for improvement through significant investment in permanent facilities. This will provide a stimulating teaching and learning environment with 21st Century facilities including improved ICT facilities, outdoor sport and extended access provision for community use, centred on the learning, self-esteem and wellbeing of all.</p> <p>This proposal, through supporting some of the County's most vulnerable learners, will support positive outcomes for these learners across all communities in Caerphilly.</p>

	<p>Active Travel:</p> <p>It is the intention of the Authority to provide a system of transport that will seek to ensure pupils can safely and comfortably access their education. The proposed location for the Centre was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, lighting and designated footpaths.</p>
<p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p><i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>The country's culture acknowledges and celebrates being bilingual in all aspects of everyday life.</p> <p>This proposal supports this Well-being goal by:</p> <p>Cultural Heritage and Welsh Language in the Community: The Local Authority is fully aware of its obligations under the Welsh Language (Wales) Measure 2011. The Welsh language has official status in Wales and the measure places duties on bodies to use the Welsh language, and the rights which arise from the enforceability of those duties, which enable Welsh speakers to use the language in dealings with those bodies (such as the provision of services by those bodies); This proposal aspires over time to the position that in EOTAS educational provision, the treatment of the Welsh language will be no less favourable than the English language and will support parental preference in enabling freedom for pupils wishing to use the Welsh language to do so.</p> <p>The country's culture acknowledges and celebrates being bilingual in all aspects of everyday life and in providing Welsh medium opportunities in education, it supports the active usage of Welsh language for pupils, families and in the wider community.</p> <p>Further details are found in section 7 of this document.</p>
<p>A Globally Responsible Wales</p> <p><i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Inclusive education and community engagement can be seen as benchmarks of life in the Welsh nation; they make a difference to the wellbeing of the nation and allow Wales to take a responsible position within the global community.</p> <p>This proposal supports this Well-being goal by:</p>

	<p>Community Impact:</p> <p>The proposed project will take into account the desire to encourage and facilitate community use of the asset. To this end the design process will seek to include measures to enable safe use of parts of the remodelled school building. The use of sporting facilities will also be considered for the community at suitable times in keeping with the curriculum timetable. The remodelled site will be accessible and will create opportunities to integrate the facility into the community with community use opportunities helping to upskill people.</p> <p>Community Benefits:</p> <p>As part of the funding requirements for all 21st Century School proposals, Welsh Government stipulates that Community Benefits are a core requirement of any contract procurement and will therefore be scored as part of the Quality evaluation. These include a number of targets around local recruitment and training, supply chains, community and education initiatives.</p>
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7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [insert link to WL Commissioners Policy Making Standards Guidance](#)



Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? e.g the WESP, TAN20, LDP, Pupil Level Annual School Census
Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2017-2022 and the Language Profile	<p>A request for EOTAS provision education through the medium of Welsh is currently unlikely to be accommodated.</p> <p>Positive</p> <p>The proposal seeks to centralise EOTAS provision and recruit staff who are able</p>	Not applicable	<p>Welsh Language (Wales) Measure 2011 (legislation.gov.uk)</p> <p>Key legislation giving the Welsh Language official legal status in Wales.</p>

	to deliver through the medium of Welsh.		<u>Welsh Language Strategy – Cymraeg 2050.</u> The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.
Compliance with the <u>Welsh Language Standards.</u> <i>Specifically Standards 88 - 93</i>	Positive All consultation responses will be able to be sent and received in Welsh and English ensuring that the Welsh language is treated no less favourably than the English language.	All documentation published on the 21 st Century Schools website relating to this proposal will have been translated through the CCBC Welsh Language Unit	<u>Caerphilly Welsh in Education Strategic Plan 2017-2020</u> A Welsh medium education assessment in accordance with the (Wales) Regulations 2013 has been conducted in accordance with the 3-year cycle requirement.
Opportunities to promote the Welsh language <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i>	Positive All signage in the proposed new extension will be bi-lingual Positive Consultation will be undertaken bilingually.	All documentation published on the 21 st Century Schools website relating to the Centre for Vulnerable Learners proposal has been translated through the CCBC Welsh Language Unit. Signage will be bilingual.	A parental demand survey was also undertaken in 2018. This proposal would support the following outcomes identified in the plan: Outcome 6:Welsh-medium provision for learners with Additional Learning Needs
Opportunities for persons to use the Welsh language <i>e.g. staff, residents and visitors</i>	Positive When considering the expansion of provision, recruitment and selection processes will reflect the need to increase the range of staff able to deliver through the medium of Welsh.	Recruitment and Selection processes includes the desirable skill to employ Welsh speakers on site.	Outcome 7:Workforce planning and Continuous Professional Development Outcome 2:More learners continuing to improve their language skills on transfer from

	<p>Positive The proposal will create further opportunities for people to use the Welsh language through day to day activities, including pupils and teachers</p> <p>Positive The Council is pro-active in supporting staff with free Welsh courses with some tailored to specific work areas. This proposal would support staff in accessing any provision as required.</p>		<p>primary school to secondary provision</p> <p><u>Caerphilly - Welsh Language Strategy 2017-2022</u></p> <p>The target to increase the Welsh speaking population by 3% over the duration of the strategy</p> <p>This proposal will support the following areas identified in the Strategy.</p> <p><i>Strategic area 2 -</i></p> <p>Increase the use of the Welsh language amongst children and young people and improve their awareness of the value of Welsh.</p>
<p>Treating the Welsh language no less favourably than the English language</p>	<p>Positive All documentation including the website relating to the proposal is produced in Welsh and English</p> <p>Positive All consultation responses will be able to be sent and received in Welsh and English</p>	<p>Not applicable</p>	<p>Strategic area 5-</p> <p>Increase opportunities for people to use the Welsh language in the workplace by enabling and supporting fluent staff and staff who are learning, to use the Welsh language in the workplace.</p> <p><u>Technical Advice Note 20 – Planning and the Welsh Language</u></p> <p>The purpose of TAN20 is to provide guidance on how the Welsh language may be given appropriate consideration in the planning system and on compliance with the requirements</p>

			of planning and other relevant legislation
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7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.

Need and demand

Currently there is little Welsh-medium provision across the range of EOTAS provision. This proposal seeks to improve that situation by recruiting staff to the new Centre who have the ability to deliver through the medium of Welsh and thereby increase the opportunities for EOTAS learners to develop their Welsh language skills.

Location

The redevelopment site has been identified at Pontllanfraith on what was formally an educational establishment. The former grammar school site has been proposed as it provides a cost effective remodelling exercise and is a relatively central location within the County boundaries to enable access from across the County.

The proposed development will be sensitive to the needs of the local community in relation to community use.

Timing

Subject to Cabinet approval and a separate full planning application process, it is envisaged that an anticipated occupation date would be circa September 2023.

Whilst the detailed proposals have yet to be developed, it is clear how important the Welsh language is to life in Wales. Maintaining and increasing the use of the Welsh Language is important to the Council and will be reflected in the future development of this Centre for Vulnerable Learners.

8. Data and Information

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

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?

<p>Initial Evidence (National and Regional Data)</p> <p>Currently, there is provision within Caerphilly as well as access to procured external providers. This provision can vary considerably in terms of cost and quality. Through our self-evaluation, we have concluded that current provision could be further developed and enhanced in order to improve pupils' outcomes and value for money.</p> <p>The aspiration as always, is to provide a good quality service to young people, with an ambition that they should feel important and safe within their learning environment.</p> <p>The Council's EOTAS Strategy sets out the background and rationale for change in order to meet the needs of an increasingly complex group of vulnerable learners and has a high level of ambition in regard to the provision to be offered to these learners.</p> <p>Rising numbers of young people accessing educational provision outside of mainstream schools continues to put an increasing strain on the Council's budget and it is recognised that this financial pressure, which is an on-going overspend, needs to be resolved. This proposal as part of the 21st Century Schools Band B programme is integral to the delivery of the strategy.</p> <p>The Band B Phase 2 proposal is to create a PRU (also referred to as a Centre for</p>	<p>Statistical Information relating to the numbers of pupils at local authority level and EOTAS enrolment:</p> <p>Caerphilly Region Figures (2018/19 data set)</p> <ul style="list-style-type: none"> • Pupils with single EOTAS enrolment - 85 • Pupils with subsidiary mainstream enrolment as well – 30 • Rising numbers of referrals to EOTAS • A shift from dual registration to single registration with EOTAS rather than dual with mainstream school • The current number of learners in EOTAS (February 2021) is 267 • Based on current trends and the potential longer term impact of Covid-19 lockdown, it is expected that future demand may rise to 290-300 <p>The 21st Century Schools and Colleges programme is a major, long-term, strategic capital investment programme. It is jointly funded by the Welsh Government and local authorities and aims to create a generation of 21st century schools in Wales with the priority areas being:</p> <ul style="list-style-type: none"> • Reduce the number of poor condition schools • Ensure that we have the right size schools in the right location • Provide enough places to deliver Welsh and English medium education 	<p>The proposal will benefit learners from across the County Borough in providing a modern fit-for purpose 21st Century provision to further enhance and support the delivery and increase of EOTAS education in CCBC.</p>
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<p>Vulnerable Learners) that will sit at the centre of the Council's EOTAS Strategy and the Cwmpawd hub and spoke model.</p> <p>Through securing agreement to proceed with transformational investment, it is envisaged that the proposed facilities will be aspirational and deliver the best in terms of learning experiences and support for wellbeing.</p> <p>The new PRU facility would provide pupils with a fit for purpose, 21st Century improved provision, accessible by all pupils referred to the PRU programme ensuring pupils receive as broad a curriculum as possible preparing the foundations for lifelong learning to ensure pupils acquire the appropriate skills and attitudes to progress to the next stage of learning and that a range of avenues remain open to them after reintegration.</p> <p>Forecasting of pupil numbers has been utilised to identify the demand for school places to ensure sufficient Educational places in our schools. This information has been used to determine the likely future demand for EOTAS provision. This includes taking account of trends over time which reveal rising demand for places and a shift from dual registration to single EOTAS registration.</p>	<ul style="list-style-type: none"> • Ensure the effective and efficient use of the educational estate 	
<p>Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled? <i>Details of further consultation can be included in Section 9.</i></p>		

None

9. Consultation

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

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

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

The School Standards and Organisation (Wales) Act 2013 requires that the Welsh Ministers issue a School Organisation Code. The Code imposes requirements in accordance with which relevant bodies including local authorities must act when bringing forward proposals in respect of maintained schools as defined at Section 98 of the 2013 Act. That is a school in Wales, which is a community, foundation or voluntary school, a community special school or a maintained nursery school.

Unlike other 21st Century Schools proposals which have been undertaken to date, this legislation does not apply to pupil referral units and as such the consultation process prescribed by the School Organisation Code 2018 does not apply in this instance

However, for the purposes of progressing this proposal and to enable transparent, balanced and open decision making, a consultation process will be undertaken and reflect the principles of the Council's Consultation and Engagement Framework 2020-2025. Utilising the "Spectrum of Engagement" approach, an appropriate level of engagement in informing and consulting stakeholders will be undertaken, mirroring the equivalent processes outlined in Section 3 of the School Organisation Code 2018 only.

When undertaking a consultation process in connection with a school proposal, the Council will publish information to enable transparent, balanced and open decision making.

As part of this proposal, the following documentation has been produced:

- A Consultation Document outlining the proposal (this document)
- A Children and Young People's Summary
- An Integrated Impact Assessment

Information is made available on the Council's website and all documentation is published in Welsh and English and available in other languages or formats on request.

Please note:

- All responses received during the consultation period will be recorded and summarised in a Briefing Report.
- Any negative responses made during the consultation period will not be counted as objections and there is no requirement to issue a Statutory Notice as part of this process, however, they will be recorded as adverse comments.
- The Briefing Report will be presented for initial review and endorsement at Education Scrutiny Committee, with final approval to proceed to the planning application and full business case stage sitting with Cabinet.
- Cabinet members will be provided with copies of all the responses received within the consultation period and in their original format as part of the decision making process.

10. Monitoring and Review

<p>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</p>	<p>The programme is managed by a Project Board comprising of the Corporate Director – Education and Corporate Services, Head of Education Planning and Strategy, Chief Education Officer, Cabinet Member for Education and Achievement, Interim Head of Property Services and 21st Century Schools Manager. The Project Board provides the overall direction, management and control for the Programme, being accountable for the success of the Programme and is the ultimate decision making body for the Programme.</p> <p>A Project Management Team comprising of the Head of Education Planning and Strategy, and resources and staff from Property Services will oversee the day to day development and implementation of each constituent project, reporting to the Board and other relevant senior officers, as appropriate.</p> <p>Key personnel have received Equality Impact Assessment Awareness, Integrated Impact Assessment sessions and Equalities Awareness Training and attended training and information sessions delivered by Welsh Government. Training needs will be constantly reviewed throughout the process and addressed when the need is evident.</p> <p>In addition, the 21st Century Schools Manager and Principal Officer have met with representatives from the Equalities, Welsh Language and Consultation Team to take guidance where required.</p>
<p>What are the practical arrangements for monitoring?</p>	

	<p>The Council recognises that the whole organisation must be skilled in making the very best use of available resources. Good project management is recognised as being an essential ingredient to success in tackling our strategic work programme.</p> <p>Project management principles will be followed (Prince2 and MS Project) throughout the programme. Programme management principles will be employed for the overarching Band B programme and the project will utilise the experience of the project team involved in the Band A project. This will commence with a Programme execution plan that will define the programme objectives, responsibilities, dependant actions and risks. The latter will include risk elimination or mitigation actions and risk owner. An overall programme monitoring tool will integrate and coordinate procurement, design and construction programmes and will highlight key dependencies and the critical path.</p> <p>In addition to the numerous reports that need to be produced in line with the requirements of the School Organisation Code 2018 and internal Caerphilly County Borough Council decision making processes, A business case model is followed to secure Welsh Government funding.</p> <p>An initial Outline Business Case / Strategic Outline Business Case has been developed at the concept stage based on the five key areas that underpin the Better Business Case Process (Five Cases Business Model).</p> <p>The Business Case focused on:</p> <ul style="list-style-type: none"> • the strategic justification and investment objectives for the project (Strategic Case) • the reasoning behind reduction of the long list to a short list of options and analysis of the options appraisal and benefits (Economic Case) • the outline cost of the project and details of match funding and profile of spend (Financial Case) • the proposed management structure (Management Case) • the commercial strategy (Commercial Case) <p>Approval to secure the funding in principle is agreed by Welsh Government at this point prior to the proposal progressing through the consultation processes.</p> <p>As the proposal progresses through the consultation processes, regular meetings with 21st Century Schools Officers in Welsh Government are held to update them on progress.</p> <p>Once a final determination is made on the proposal by Cabinet, a Full Business Case will be submitted to Welsh Government which will solely focus on the tendered costs unless anything</p>
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	<p>has changed since agreement to the original business case was submitted. At this point, with the approval of Welsh Government, the funding is released to implement the proposal.</p> <p>Should the proposal then be implemented (based on approval as outlined above), on completion of the works a Welsh Government Closing Report is produced, supported with full project costings and analysis as to whether the community benefits have been achieved.</p> <p>The 21st Century Schools team are required to monitor projects for their first five years through completion of post occupancy evaluation workshops with pupils and staff. This is also reported to Welsh Government and supports the Council in considering best practice and any areas for improvement on future projects.</p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p>The Council produces a protocol document for each school opening/closure/amalgamation project. This outlines individual and team responsibilities for the full list of actions required over the 3 stages of design and pre-construction, construction and school occupation and decommissioning.</p> <p>Regular monitoring meetings take place and typically involve 21st Century Schools Team, Headteachers, Education advisers, Property Services, Catering Services, ICT, Traffic Management, Procurement and Audit representation. Relevant stakeholders will also be involved in post project evaluation to review outcomes to ensure improvements are made for future projects.</p> <p>Benefits Realisation will be monitored by the project team and Caerphilly County Borough Council and reported to Welsh Government through the project closure report and other relevant documentation. Community benefits will be reported quarterly and yearly and when the project ends.</p> <p>The project will be subject to gateway review as required by the funding agreement. The review is one by which independent practitioners from outside the programme/project use their experience and expertise to examine the progress and likelihood of successful delivery of the programme or project. Any recommendations of the review team will be taken on board and implemented as appropriate.</p> <p>A post contract review will also be undertaken.</p>
<p>When is the proposal due to be reviewed?</p>	

	The proposal will be brought before Education Scrutiny Committee and Cabinet for review and endorsement of the recommendation within the briefing report. The report will be presented after the consultation period has ended and copies of all responses will be included as part of the pack provided to Cabinet members for consideration as part of the decision making process.
Who is responsible for ensuring this happens?	<p>Cabinet Members will be asked to review the proposal and make the final determination as to whether to implement the proposal as outlined below: To develop a new Centre for Vulnerable Learners (CVL) at Pontllanfraith (Old Pont Grammar School site) through the remodelling of the existing buildings.</p> <p>If approved, it will be the responsibility of the Author of this report (or nominated officer within their section) to ensure the Integrate Impact Assessment and proposal is reviewed and any mitigating actions followed up on and actioned.</p>

11. Recommendation and Reasoning

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

Have you contacted relevant officers for advice and guidance?

Yes ☒

No

☐

12. Reason(s) for Recommendation

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

It is the recommendation of this Integrated Impact Assessment and in line with the processes outlined in the School Organisation Code 2018 that Members endorse the proposal to develop a new Centre for Vulnerable Learners (CVL) at Pontllanfraith (Old Pont Grammar School site) through the remodelling of the existing buildings.

The information gathered and reviewed as part of this IIA demonstrates the growing demand for EOTAS provision and the benefits of developing a new Centre at Pontllanfraith.

13. Version Control

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

Version No.	Author	Brief description of the amendments/update	Revision Date
1.	Andrea West	To ensure compliance with the new socio-economic duty set out in section 1 of the Equality Act 2010, which comes into force on 31 st March 2021, this newly established Integrated Impact Assessment (IIA) template has been utilised to act as the update and revision to the existing Equality Impact Assessment and Community Impact Assessment to include the relevant information highlighted through the statutory consultation processes.	

Integrated Impact Assessment Author

Name:	Andrea West
Job Title:	21 ST Century Schools Manager
Date:	<i>A.West</i>

Head of Service Approval

Name:	Sue Richards		
Job Title:	Head of Education Planning and Strategy		
Signature:	<i>S.Richards</i>	Date:	23.7.21