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Consultation – summary of response

School Organisation Code

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

School Organisation Code

Audience	Local authorities; governing bodies of maintained schools; diocesan authorities; Estyn and others with an interest.
Overview	This document summarises views on a consultation on proposed changes to the School Organisation Code.
Action required	None. For information only.
Further information	Enquiries about this document should be directed to: School Effectiveness Division Education Directorate Welsh Government Cathays Park Cardiff CF10 3NQ Tel: 03000 622017/03000 251733 e-mail:SchoolsManagementDivision3@gov.Wales
Additional copies	This document can be accessed from the Welsh Government's website at www.gov.wales/consultations
Related documents	School Organisation Code 2013 School Standards and Organisation (Wales) Act 2013 Measuring the capacity of schools in Wales

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Introduction

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 (the Welsh Ministers, local authorities, governing bodies and other promoters) must act. It also includes practical guidance to which relevant bodies must have regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals.

The current School Organisation Code came into force on 1 October 2013. Following three years of operation the Code has been reviewed reflecting on feedback and learning during that period. The majority of the proposed changes provide clarity where that was needed. Other proposed changes seek to strengthen the Code, for example by requiring consultation documents to be published on a school day. These changes were discussed informally with local authorities and diocesan authorities and their views sought on these and any other changes considered necessary.

In addition to these and the most substantial change proposed is to strengthen the Code in respect of a presumption against closure of rural schools. A presumption against closure of rural schools does not mean that rural schools will never close. However, the case for closure must be strong and not taken until all viable alternatives have been explored.

Local authorities and other proposers must comply with the School Standards and Organisation (Wales) Act 2013 and any mandatory elements within the School Organisation Code and must consider a range of factors when proposing substantial changes to schools, the prime consideration being the interests of learners. There is currently no presumption in favour or against the closure of any type of school. The current Code recognises that the prime purpose of schools is the provision of education and any case for closure should be robust and in the best interests of education provision in the area. However, the current Code also recognises that in rural areas a school may also be the main focal point for community activity and its closure could have implications beyond the provision of education, particularly if the school buildings are used as a place to provide services to the local community.

We propose to strengthen this by introducing a presumption against the closure of rural schools. The proposals for a presumption against closure of rural schools which were subject to consultation seek to balance the legitimate wishes and concerns of rural communities and parents with the responsibilities of local authorities for the delivery of public services.

When considering whether closure is appropriate the current Code states that special attention should be given to alternatives to closure and when consulting on proposals the consultation document must contain a description of any alternatives and the reasons why they have been discounted. We believe that considering all the possible alternatives should be a two-stage process. The proposer should do this before they even reach a decision to

consult on a proposal to close, and should also consider any further options or suggestions that emerge during the consultation process. The aim is to ensure that the decision to propose and consult on closure of a rural school is taken only after all alternatives to closure have been considered, including federation. We believe that this change will result in a more open and transparent system; the consultation will be well informed by a clear explanation of why the proposer has reached the decision to propose closure and the background information supporting that decision will be clearly set out. Proposers will have long deliberated over whether to proceed to consultation on the closure of a rural school. However, it is important that the proposer is seen to be open to new ideas, suggestions and proposals emerging from the consultation and that the final decision which the proposer makes is not a foregone conclusion.

In order to have a presumption against closure of rural schools it is necessary to define rural schools for this purpose. The consultation also therefore sought views on an appropriate designation of rural schools using the National Statistics Urban-Rural Classification.

The Code recognises that local authorities are responsible for ensuring that there are sufficient schools providing primary and secondary education for their area. Schools are regarded as sufficient if they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education. In order to fulfil these duties, local authorities must ensure that they plan thoroughly for schools serving their areas. The Code also recognises that education must be the primary consideration. This is linked directly to a local authority's duty to strive to raise standards of education.

It is these considerations which require local authorities to take into account wider factors such as the need to manage the school estate as efficiently and effectively as possible. This includes managing excessive numbers of surplus places which tie up resources unproductively – resources which are then unavailable for use in raising standards and quality of education for all pupils. This means that they must look to reduce excessive numbers of surplus places in schools that are significantly under-occupied. Although the Code encourages local authorities to manage surplus places, this does not necessarily mean closing schools. The Code encourages them to explore alternatives to closure including collaboration or federation, increasing community use of school buildings or co-location of local services within the school to offset costs.

1. Summary of responses received

A 14 week consultation ran from 30 June 2017 until 30 September 2017. A total of 70 responses were received from a wide representative range of key stakeholders including local authorities, diocesan authorities, school governing bodies, parents and individuals, teaching unions, community and town councils, Estyn and others. A full list of respondents is included at annex 1. Some respondents asked to remain anonymous and this wish has been respected throughout this summary report.

While the majority of respondents used the online consultation response form, a small number responded in letter format. As a result, not all questions have been answered by all respondents. However, narrative response has been included in this summary analysis by allocating comments made to the most appropriate question section.

The consultation document posed 13 questions to seek views on proposed revisions to the Code. Two specific questions (questions 11 and 12) were asked to comply with the requirements of the Welsh Language Standards for policy making. An analysis of responses to each question is included below. Unless otherwise stated throughout this report percentages are expressed as a measure of respondents to each question.

Question 1

Do you agree with the suggested amendments to the Code to reflect feedback and learning after three years of operation?

Agree	Disagree	Neither agree nor disagree	Total
38	5	4	47
81%	11%	8%	100%

Summary of Responses

The majority of respondents agreed with the suggested amendments. One questioned whether time durations indicated for learner journeys in the existing code stand.

Welsh Government Response

The Learner Travel (Wales) Measure 2008 does not specify a time limit for journeys. However, Section 2 of the Measure places a duty on local authorities to assess the travel needs of all learners in their areas. The Learner Travel Statutory Provision and Operational Guidance 2014 (which supersedes the 2009 Guidance) does not make reference to specific journey time limits, as the setting of such limits is a customary practice by central and local government as opposed to a statutory requirement.

The current Code recommends that where a school closure, reduction in capacity or age range contraction is proposed relevant bodies should consider the nature of journeys to alternative provision and resulting journey times for pupils, including SEN pupils; in particular whether primary school pupils will have one-way journeys in excess of 45 minutes or secondary school pupils one way journeys of over an hour. Although not a statutory requirement we consider that the guidelines are helpful and therefore propose to retain these in the revised Code.

Question 2

Do you agree with the proposal to require the consultation document to be published on a school day?

Agree	Disagree	Neither agree nor disagree	Total
45	3	0	48
94%	6%	0%	100%

The vast majority of respondents agreed with this proposal. There was broad consensus that publishing the consultation document on a school day would strengthen the existing requirement for the consultation document to be issued during term time and provide an opportunity for full engagement. However, several respondents sought clarification on the definition of a school day. One respondent suggested that the Code should make clear that a school day related to a school day 'of the schools affected'.

Welsh Government Response

The current Code states that the consultation document **must** be issued during the term time of the schools affected and consultees **must** be given at least 42 days to respond with

at least 20 of these being school days. Requiring consultation documents to be published on a school day will strengthen this requirement, ensuring all those associated with the school, including parents and teachers, are made aware of the proposal at the very earliest opportunity and have the maximum time available to consider and respond.

A school day is defined in section 579 of the Education Act 1996 as any day on which at that school there is a school session. A school session can be a morning session or an afternoon session, so a school day is any day when the school meets for all or part of the day. The revised Code will make clear that for the requirement of publishing consultation documents a school day does not include an inset day and that reference to a school day relates to the schools that are subject to the proposal.

Question 3

Do you agree that consultees should be advised of the availability of the consultation document; including the web address and that a hard copy can be obtained on request?

Agree	Disagree	Neither agree nor disagree	Total
45	1	1	47
96%	2%	2%	100%

There was broad agreement with this proposal. One respondent pointed out that this would remove a significant financial and logistical burden from local authorities on having to provide hard copies of consultation documents to all statutory consultees.

Welsh Government Response

We consider it reasonable for those bringing forward proposals to be required to advise consultees of the availability of the consultation document; including the web address and that a hard copy can be obtained on request.

Question 4

Do you agree that those who do not carry out the consultations themselves must consider the extent that the statutory consultation and proposal have been conducted in accordance with the Code?

Agree	Disagree	Neither agree nor disagree	Total
40	3	4	47
85%	6%	9%	100%

The majority of respondents agreed with this proposal. However, some of the supporting comments indicated that some had not fully understood what was proposed and that further explanation was needed.

- *This would introduce an additional requirement or an alternative mechanism to the council's decision making process undertaken by the Council's cabinet.*
- *Further information is required as to the definition of "those that do not carry out the consultation themselves"*

- *What is meant to be the difference between approving and determining school organisation proposals? Can this be explained or defined?*

Welsh Government Response

The purpose of this amendment is to distinguish between the existing responsibilities of the relevant bodies (Welsh Ministers, local authorities, governing bodies of voluntary aided and foundation schools and other proposers) in ensuring consultations and proposals comply with the Code. A more detailed explanation of the proposal is set out below.

The changes to the draft second edition of the Code means that a governing body or local authority approving a proposal must ensure that the consultation has been conducted and the notice published in accordance with the Code, whereas a local authority or the Welsh Ministers determining a proposal must consider the extent to which the consultation has been conducted and the notice published in accordance with the Code.

The draft second edition of the Code recognises that where a governing body or local authority is the proposer and they have the function of approving that proposal, they are able to ensure that consultation is conducted and the notice published in accordance with the Code. Whereas a local authority or the Welsh Ministers determining a proposal are not the proposer, are not responsible for undertaking the consultation and are not able to ensure the proposer acted in accordance with the Code, but they can consider the extent to which the proposer has conducted consultation in accordance with the Code.

Section 1.14 of the existing Code states that when approving or determining proposals, relevant bodies *[the Welsh Ministers, local authorities, the governing bodies of maintained schools and other promoters]*:

- *must ensure that the statutory consultation has been conducted in accordance with this Code;*
- *must ensure that the proposal has been published in accordance with this Code and the notice contains all the required information;*

Section 1.15 of the draft second edition of the Code separates and clarifies the responsibilities of those approving proposals and those determining proposals as follows:

When approving the proposals, relevant bodies who are the proposer:

- *Must ensure that the statutory consultation has been conducted in accordance with the Code (the requirement to consult does not apply to proposals to discontinue a school which is a small school);*
- *Must ensure that the proposal has been published in accordance with this Code and the notice contains all required information;*

When determining proposals relevant bodies:

- *Must consider the extent to which the statutory consultation has been conducted in accordance with the Code (the requirement to consult does not apply to proposals to discontinue a school which is a small school);*
- *Must consider the extent to which the proposal has been published in accordance with this Code and the notice contains all required information;*

What is the difference between approving and determining proposals?

Most proposals brought forward by a governing body that receive no objections are decided by the governing body and fall into the category of approving. Most proposals brought forward by a governing body that receive objections are decided by the executive committee of the relevant local authority and fall into the category of determining.

Most proposals brought forward by a local authority whether they receive objections or not are decided by the executive committee of the relevant local authority and fall into the category of approving.

A small number of proposals require the approval of the Welsh Ministers under Section 50 of 2013 Act (proposals that affect sixth form education and proposals brought forward by a proposer other than the relevant local authority and proposals where an objection has been made by that local authority. These proposals are decided by the Welsh Ministers and fall in the category of determining.

Question 5

Do you agree that there should be a procedural presumption against the closure of rural schools?

Agree	Disagree	Neither agree nor disagree	Total
37	7	3	47
79%	15%	6%	100%

The majority of respondents agreed that there should be a procedural presumption against the closure of rural schools. This included eight local authorities five of which are predominantly rural. Comments included:

- This is in line with recent decisions made by the council not to proceed with closure of school provision and an increased focus by the council on alternative models such as collaboration, federation and amalgamation.
- The authority always prioritises the quality of education as a main factor but is already considering local factors including the rural nature of many of the County's schools.

One respondent who agreed stressed that a presumption against closure of rural schools should not mean that some schools do not close as there have been instances where school closures are in the best interests of the community if they lead to better provision in the long run.

One local authority whilst agreeing with the presumption against closure felt that it could potentially disadvantage rural areas for investment in the 21st Century Schools Programme due to the small size of the schools concerned.

Welsh Government Response

A presumption against the closure of rural schools does not mean rural schools will never close, but the case for closure must be strong and all viable options to closure must be considered, including federation. Both the current Code and the proposed second version of the Code are clear that relevant bodies should place the interests of learners above all

others with quality and standards of education being the prime consideration. However, the presumption against closure recognises that the closure of a rural school can have and impact beyond the issue of education.

With regards 21st Century Schools funding, there is no cap on the size of a school that can benefit from the funding. It is for local authorities to determine which proposals they bring forward to best meet the needs of their area.

Question 6

Do you agree with the more detailed set of procedures and requirements proposers will need to follow in formulating a rural school closure proposal and in consulting on and reaching a decision as to whether to implement a rural school closure proposal?

Agree	Disagree	Neither agree nor disagree	Total
35	6	6	47
74%	13%	13%	100%

The majority of respondents agreed with this proposal with one predominantly rural authority commenting. *“Any transparent procedure that demonstrates to stakeholders that all other options have been considered fairly prior to the decision to close is welcome. However, we do not feel that any amount of added consultative requirements will make decisions such as these any less contentious.”*

Several predominantly rural local authorities pointed out that they already have robust processes in place for potential rural school closures:

- *Our process when reviewing rural schools is already broadly similar to the steps outlined.*
- *The council is confident that it already follows comprehensive engagement processes through ensuring local input in the development and consideration of any strategic plans.*
- *Proposals are not formulated without specific and clear reasons and they are not considered in the decision making process without these reasons being made clear. Consideration of alternatives is already undertaken, however, we welcome the added emphasis in the Code*

Several respondents suggested that the detailed set of procedures and requirements should apply to all school closures.

- *Although we agree with the principle, we feel that this should be a standard process for all schools regardless of size or location.*
- *We feel that the process that the proposer must follow in determining a decision to consult on the closure should apply to all school closure proposals.*
- *We feel that small and rural schools should not be dealt with more advantageously than other schools. As such we would be happy to see the more detailed procedures applied to all proposals.*

However, as one respondent pointed out *“All school closures should be carefully and fully considered. However, the potential social and wider impact of a rural school closure requires even more scrutiny as the impact beyond the immediate school stakeholder group can be significant.”*

Welsh Government Response

The introduction of a presumption against the closure of rural schools recognises that the closure of a rural school can have a significant impact beyond the issue of education. As such whilst we consider that there is a case for introducing a procedural presumption against the closure of rural schools which would require proposers to undertake a more detailed set of procedures and requirements, we do not agree that this should be extended to all schools. We are satisfied that there are already sufficient ‘safeguards’ in place for the closure of schools other than those designated as ‘rural’, as the existing Code requires that for any proposal involving the closure of a school a community impact assessment must be undertaken and the proposer must give special attention to alternatives.

Question 7

Do you agree that the proposer should also be required to follow the more detailed set of procedures and requirements in formulating a rural school proposal where the small school is also designated as a rural school?

Agree	Disagree	Neither agree nor disagree	Total
35	12	6	53
66%	23%	11%	11%

The majority of respondents agreed with this proposal. However, 8 of the 15 local authorities that responded to this question disagreed. Comments included:

- *Existing procedures for a small school closure with fewer than 10 pupils are sufficient and applying the proposed procedures will just delay the process.*
- *By the time pupil numbers have reached the small school threshold of fewer than ten pupils the school unfortunately, is considered financially and educationally unviable for the short, medium and long term, we consider the current procedures should remain.*
- *We do not believe that a school with fewer than 10 children is sustainable, and we would not want to make the process of closing such schools more burdensome or prolonged than what it already is. We do however agree with the need to consider the community and linguistic effects of closing such a school, and to ensure that there isn't a linguistic disadvantage (or any other disadvantage) to the children by transferring to neither a nearby school, nor a loss with regards assets or community facilities. Those learners, families, and communities deserve the same level of respect as other communities.*

However, one local authority that agreed with the proposal commented: “Closures of schools are always contentious. Any transparent procedure that demonstrates to stakeholders that all other options have been considered fairly prior to the decision to close is welcome”.

Another respondent commented: “While there may be different arguments for closing or maintaining a school based on pupil numbers there shouldn't be a different standard to which the proposer should be required to proceed with the process”.

Welsh Government Response

The School Standards and Organisation (Wales) Act 2013 provides for a more streamlined procedure for proposals to discontinue a small school (defined as a school with fewer than

10 registered pupils at the January school census point). The requirement to consult does not apply to proposals to close small schools, although the proposer is still required to publish the proposal. The current Code also makes clear that before publishing the notice proposers should still take into account the same factors that they would have for a proposal to close a school with more than 10 pupils.

This means that under the existing Code the proposer must already consider all the relevant factors set out at section 1 of the Code, which includes assessing the impact of proposals on quality and standards in education and how effectively the curriculum is being delivered, the need for places and the impact on accessibility of schools, resourcing of education etc. They must also consider the impact on the community through the production of a community impact assessment and give special attention to alternatives to closure. Under this proposal where a school designated as a rural school which has fewer than 10 registered pupils is proposed for closure the proposer would also need to:

- Identify clear and specific reasons for formulating the proposal
- Identify any reasonable alternatives to closure which might also address the reasons for the proposal and provide evidence to show that it has carefully considered all other viable options (including federation) with a clear assessment of the merits and their viability including:
 - ✓ the likely education benefits
 - ✓ the likely impact on the community
 - ✓ the likely impact on travelling arrangements; and
- Set out in the proposal paper (which is a paper to be presented to the decision maker) the alternatives that have been identified, give an assessment of these and explain why they consider in the light of the assessment that implementation of the closure proposal would be the most appropriate response to the reasons for the proposal.

In accordance with the School Standards and Organisation (Wales) Act 2013 the requirement for formal consultation is waived. As such we consider that the additional process outlined above should not add a significant burden or significantly increase the timeframe. It should however make the process more transparent and ensure that the options already being explored and their likely impact and effects are recorded and documented before deciding to proceed with closure.

Question 8

Do you agree with proposals to designate some schools as rural for the purposes of the presumption against closure and the list of schools provided at Annex 1? If not, please note which schools should not be included and which other schools should be including along with the reasons.

Agree	Disagree	Neither agree nor disagree	Total
34	19	4	57
60%	33%	7%	100%

The majority of respondents agreed with the proposals. This included 8 local authorities, 5 of which are predominantly rural. Comments included:

- *Our view is that the schools designated as rural for the purposes of the presumption against closure are appropriate.*
- *The formula used to designate what constitutes a rural school appears to provide some consistency and enables more straightforward comparisons.*
- *A list of rural schools is an appropriate part of the code and would certainly provide clarity when navigating reorganisation and reduce the risk of legal challenge concerning the definition of what is and is not 'rural'.*
- *The list of schools is useful. It is for local authorities to scrutinise the list for accuracy.*

However, analysis of the supporting comments indicates that 6 of the 34 considered that the designation was too restrictive with 3 of these suggesting 2 other schools that should be included on the list of rural schools.

19 (33%) of respondents disagreed with the proposals including 6 local authorities, 3 of which are predominantly rural. 9 of the 19 respondents did not agree as they were opposed to the introduction of a presumption against the closure of rural schools.

The remaining 10 respondents that disagreed made specific reference to the designation and/or the list of rural schools and suggested that it was too restrictive, although there was no consensus between them on a preferred alternative.

- 1 considered that we should adopt the methodology used in Scotland
- 1 considered we should adopt the categorisation adopted by England and that 1 other primary school should be included on the list.
- 1 pointed out that there were no schools from the Vale of Glamorgan on the list and considered that we should consider issues such as lack of public transport, infrastructure necessary, size of village, lack of local amenities and farming community.
- The Diocese of St Asaph disagreed with the methodology for the definition as they considered that the rural urban classification should not be used in isolation but that it should be balanced by socio economic and demographic considerations to create a unique methodology to determine rurality in a uniquely Welsh context. They listed 35 schools within the Diocese of St Asaph they considered to be rural. Their view was endorsed by 6 other respondents including the Diocese of Monmouth and individuals associated with schools in the Diocese. 9 of these schools were already on the list of rural schools that was subject to consultation

Welsh Government Response

In order to have a presumption against the closure of rural schools it was necessary to define "rural schools". We considered two options.

The first was to designate rural schools based on some school-specific features or criteria. However, we believed that this could result in much argument over both the criteria and its interpretation in each local case, in other words whether a particular school should or should not appear on the list.

The second and preferred approach was to use a more generic definition of rural areas so that any schools within those areas would automatically be designated as rural for the purpose of the proposals. We considered that the clearer and more transparent a definition of rural areas that can be devised or used, the more the results would be likely to command respect and provoke the least argument around the detail.

A list of rural schools was created using the National Statistics Urban Rural Classification which covers England and Wales and is the result of a joint project set up by a number of UK Government departments and the Welsh Government. The classification is currently used in England as the basis of its designation of rural schools. It separates schools into one of 8 categories according to the nature of their location.

1. Large town in sparsest context.
2. Small town in sparsest context
3. Village in sparsest context.
4. Other (hamlet or dispersed) in sparsest context.
5. Large town in less sparse context.
6. Small town in less sparse context.
7. Village in less sparse context.
8. Other (hamlet or dispersed) in less sparse context).

For the purposes of the consultation a rural school was identified using the Urban-Rural classification as being located within villages in the sparsest context and other (hamlet or dispersed) in sparsest context 3 and 4 of the detailed classification above.

A list of schools was derived from this classification. The consultation document suggested that this is the minimum number of schools which should be designated as rural for the purpose of the presumption against closure of rural schools. Based on their local knowledge consultees were asked to give their views on whether these or any other schools should be designated as rural schools for the purposes of the presumption against closure. The consultation document made clear that a final decision on the categories of the Urban Rural classification that will make up the designation would be made following analysis of responses.

The majority of respondents agreed with the proposals. However, 16 (28%) of the 57 respondents (comprising of 6 that agreed with the proposals and 10 that disagreed) considered that the designation was too restrictive.

We are not persuaded that we should change the methodology for designating rural schools, which is also used in England. We are satisfied that the methodology proposed is sound.

Based on the outcome of the consultation we can confirm that schools in the categories of “village in the sparsest context” and other (hamlet or dispersed) in sparsest context of the Urban-Rural Classification will be the minimum number of schools that will be designated as rural for the purposes of the presumption against the closure of rural schools.

However, following full consideration of responses, we propose to extend the designation of rural schools to include a further category of the Urban/Rural classification, thereby bringing a number of additional schools within the designation of ‘rural’.

Given that the majority of respondents agreed with the proposed designation and list that derived from it, and taking into account responses that suggested specific additional schools that should be included on the list, we are proposing to make a modest change by adding the category “Other (hamlet or dispersed) in a less sparse context” element 8 of the detailed urban-rural classification above. As a result the categories of the urban-rural classification which will be used to designate rural schools for the purposes of the presumption against closure of rural schools will be extended from categories 3 and 4 to categories 3, 4 and 8 of the detailed classifications above.

Extending the designation and list in this way and taking into account schools that have closed since the consultation commenced will increase the number of schools on the list by 28 resulting in 219 schools or 17.4% of schools in Wales being designated as rural.

The up to date list of rural schools for the purposes of the presumption against closure of rural schools is attached at annex A. We will monitor implementation of the Code, including the presumption against closure and the designation of rural schools for this purpose.

Question 9

Do you agree with the proposed amendment to the section on surplus places to make clear that although local authorities are required to manage surplus places this does not necessarily mean closing schools, and that they should consider alternatives?

Agree	Disagree	Neither agree nor disagree	Total
40	3	2	45
89%	7%	4%	100%

There was broad agreement that the proposed amendment to the section on surplus places was both practical and sensible. However whilst several local authorities agreed with the proposals some pointed out that although exploring alternatives such as federation might enable the schools involved to operate more efficiently by sharing expertise and resources, they would not lead to a reduction in surplus places in the schools involved. Comments included:

- *Whilst alternatives might enable schools involved to operate more efficiently by sharing expertise and resources, they would not lead to a reduction in surplus places in the schools involved.*
- *Federation, Collaboration and Amalgamation do not deal with surplus spaces effectively. The only way to remove surplus places is to close schools and following careful consideration this might be the only viable option.*

Two respondents questioned who would fund the adaptation and subsequent use of school buildings as community resources or co-located service facilities.

Welsh Government Response

We have asked authorities to manage excessive surplus places, but this does not automatically mean closing schools. The current Code encourages authorities considering closure of any school to give special attention to other options available to them and their schools. We recognise that federation and collaboration may not necessary reduce surplus places but promoting shared governance arrangements between small primary schools can be a way of addressing financial and educational challenges resulting from falling pupil rolls. Federated schools may have a single head teacher, greater flexibility in use of staff and other resources, and scope to reduce administrative costs while remaining open on separate sites. The Welsh Government has introduced a new small and rural schools grant of £2.5 m per year from 2017/18. The grant can be used by authorities to increase school to school working including federation.

We also encourage authorities to look at rationalising school space. This might involve removing temporary accommodation or broadening the services their schools offer. LAs

can designate under-utilised parts of the school premises for community use and thereby exclude them from the calculation of the school's capacity for admissions purposes. This can give schools the freedom to permanently change the use of surplus accommodation, and undertake appropriate modifications for the new purpose. We recognise that it will not always be practicable or desirable to remove all surplus places. We also accept that some schools in rural areas may operate with a higher percentage of empty places than schools in urban areas.

Community use of school facilities should be self-financing through alternative funding streams or charges to users. One of the purposes for which the Small and Rural School grant can be used is to increase community use of school buildings including adaptations for this purpose.

Question 10

We would like to know your views on whether the detailed set of procedures and requirements proposers will need to follow in respect of proposals to close rural schools will add a burden to the local authority? If you feel that there will be an additional burden on the local authority, what do you think the burden will entail? Please give details of impact including time and cost.

Summary of responses

There was general consensus amongst the 39 respondents who responded to this question that the detailed set of procedures and requirements proposers will need to follow will add an additional burden to the local authority. Several respondents felt that local authorities were best placed to quantify these.

11 local authorities responded to this question, including 8 predominantly rural local authorities which are likely to be most affected by the proposals. Several of these stressed that they already spend a significant amount of time and resources exploring all viable options available for rural schools and that proposals to close schools are only made following consideration and discussion of a number of alternatives. One local authority pointed out that the "additional burden" has always been part of their process. Another said that they were already following a comprehensive engagement process when considering any impact on communities.

Although local authorities were unable to quantify the impact of the more detailed set of procedures and requirements in respect of time and cost at this stage they considered that the additional burden would entail an impact on officer time and available resources, examples given included:

- familiarising with the additional requirements;
- exploring each option before proceeding to formal consultation and more detailed analysis and documentation of the relevant factors;
- ensuring the connection between the schools modernisation programme and the community planning process; and
- Consideration of the role of the school as a community hub including discussion with a range of other agencies and additional resources to manage community use of schools/buildings jointly.

Several authorities considered that the additional procedures will lengthen the overall process for completing statutory consultations and have an effect on an authority's ability to rationalise provision in a timely manner in a climate of financial pressure.

One local authority considered that this it would create an additional risk of legal challenge (especially in the context of 'rural' legal scrutiny) and resources channelled into defending such challenges.

Although, they identified an additional burden, a number of rural authorities were able to see the benefits of the more detailed set of procedures and requirements commenting:

- *The new procedures should in the long run make the process more transparent and it will ensure that all stakeholders understand that all options have been considered prior to closure.*
- *The additional procedures and requirements will, in the main, ensure that the options already being explored and their likely impact and effects are recorded and documented before deciding to proceed with closure.*

Welsh Government Response

We acknowledge that the additional procedures and requirements may place an additional burden on some local authorities in respect of staff time. However, a number of the comments provided by local authorities support our view that some proposers are already doing much of what the second version of the Code will make mandatory in respect of potential rural school closures. However, as pointed out by one local authority the *"additional procedures and requirements are likely to strengthen proposals ensuring that the likely impact and effects thereon are comprehensively documented before deciding to proceed with closing a rural school"*. We will continue to monitor the implementation of the second version of the Code to ascertain the impact of the introduction of the presumption against the closure of rural schools is having on local authorities.

Question 11

We would like to know your views on the effects that a presumption against the closure of rural schools would have on the Welsh language, specifically on
i. Opportunities for people to use Welsh, ii. Treating Welsh no less favourably than English

What effects do you think there would be, how could positive effects be increased and negative effects be mitigated?

Question 12

Please also explain how you believe the proposed policy could be formulated or changed so as to have: i. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language and ii. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Questions 11 and 12 sought views on the Welsh language. Some respondents commented that the questions were too similar and others commented 'see above' or repeated their answer to question 11 in the second question. Therefore this analysis will combine the two questions of which 31 respondents including 10 local authorities entered some narrative comments. In addition, relevant and related responses received in previous questions have been included in this section.

13 respondents considered that a presumption against the closure of rural schools would have a positive effect on the Welsh language. Their responses fell into three broad areas:

- by protecting or maintaining schools where Welsh is the natural language of the community or where the village primary school is the only venue where Welsh is used in areas that are exclusively English speaking.
- By providing an opportunity for newcomers to the area with no knowledge of the Welsh language to learn Welsh and become fluent Welsh speakers.
- By providing opportunities for people to use the Welsh language where the school is a focal point for cultural and social events in the community.

One respondent considered that the presumption against closure could have a negative impact as *"it may limit opportunities to learn Welsh if a small school with low occupancy is not able to provide a full curriculum"*. Another respondent considered that *where English-medium schools which are both small (i.e. under 90 pupils) and rural are located, the existence of small schools makes it more difficult to provide equal access to Welsh-medium and English-medium provision, as these schools are too small to support the introduction of a Welsh-medium stream*. It is likely to have a negative effect in terms of the authority's ability to provide improved access to Welsh-medium provision to pupils living in areas which aren't traditionally Welsh speaking.

Some respondents considered that there would be little to no impact and pointed out that there are existing safeguards in the current Code and local authority procedures in respect of Welsh language provision:

- *Where proposals are brought forward such as a closure, local authorities would offer equivalent schooling as alternatives. The potential impact of closure proposals on the Welsh language would be assessed by local authorities prior to bringing forward proposals.*
- *If the rural school is Welsh medium then the replacement provision offered should also be Welsh medium, thus negating any effect or impact on the Welsh language.*
- *If there is a proposal to close a Welsh medium school, which was also classed as a rural school, consideration would have to be given, for example, for travel arrangements for pupils to attend the nearest Welsh medium school.*
- *If the school earmarked for closure is a Welsh medium school the Welsh language factor would have to be taken into consideration if demand for Welsh medium education existed.*

Respondents suggested that the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language by:

- If Wales is to realise the target of a million speakers by 2050, the linguistic character of any new arrangements needs to be strengthened e.g. 1: English medium and 1 dual stream school merging should be dual stream at the very least. 2: 1 dual stream and 1 Welsh medium school merging should reasonable evolve to be Welsh medium, under the auspices of Welsh in Education Strategic Plans.
- the code could be formulated to require robust justification for not moving the language category of any school up the scale of Welsh categorisation
- It needs to be easier for authorities to change a school's language category, and to make other changes to the way Welsh-medium education is delivered.
- The proposed policy does not give sufficient weighting to the local authorities' Welsh in Education Strategic Plans. We welcome the fact that there is an increased requirement that providers' reference in the consultation document how the proposal fits in with the authority's Welsh in Education Strategic Plan. This needs to be strengthened further by requiring providers to identify how they have taken into account the demand for Welsh-medium education in the area affected by the proposal, what steps they have taken to measure this demand and whether there are sufficient Welsh medium places for pupils in the area affected. Presently, proposers do not give sufficient weighting to these matters.
- Proposers should be required to undertake a Welsh Language Impact Assessment for all proposals not just those where the schools affected have Welsh as a medium of instruction for subjects other than Welsh for some or all of the time.

Welsh Government response

All significant changes to education provision known as regulated alterations are described in the School Standards and Organisation (Wales) Act 2013. Section 2 of the Code replicates these. In the 2013 Act and the Code changes to primary schools are described in terms of increasing or decreasing the percentage of teaching time in English or Welsh. Changes to secondary schools are described in terms of increasing or decreasing the number of subjects taught through the medium of English or Welsh.

Amendment to these regulated alterations is outside the scope of the consultation on the Code as an amendment to the 2013 Act would be necessary. We will monitor the situation but we are not persuaded that amending the regulated alterations is necessary currently.

We consider that it would place an unnecessary burden on proposers to require them to undertake a Welsh Language Impact Assessment for all proposals. We have however, amended the Code to include a greater focus on the Welsh in Education Strategic Plan Section 3 of the Code has been amended so that consultation documents must provide the following information:

- *the extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP);*
- *How the proposal would expand or reduce Welsh language provision, in the case of the latter, set out why provision will be reduced.*

To reinforce this we will consider amending section 1.4 of the Code to include these as factors to be taken account when preparing and publishing proposals.

Question 13

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

A range of views were expressed by 14 respondents to this last question. Some of these have been added to the narrative of previous sections where relevant. Additional points made are included below.

Establishment of voluntary schools - Two respondents considered that a local authority should not be able to establish voluntary schools.

Welsh Government's response - The School Standards and Organisation (Wales) Act 2013 permits a local authority to establish a voluntary school in Wales. The Welsh Government is currently considering the matter and whether the legislation should be amended to prevent a local authority from doing so. This is beyond the scope of the School Organisation Code as an amendment to the 2013 Act would be required.

The revised Code will therefore reflect the current position. However, the Code will make clear that where a local authority proposes to establish a voluntary school with a religious character they should work closely with the relevant religious body.

Commencement of the second edition of the Code - The summary of the draft Code refers to the date on which the second edition of the Code will come into force and that "Proposals published before this date will be determined in accordance with the first edition of the Code." One respondent suggested that for the avoidance of doubt, it would be helpful to refer to proposals being published "by way of statutory notice".

Welsh Government's Response: We agree and will amend the Code accordingly

Regulated alterations - Consideration should be given to streamlining the process that has to be undertaken for certain school reorganisation proposals, including extensions to schools where the pupil population is increasing or certain SEN amendments, such as relocation of designated classes or the change of type of provision.

The arrangements for regulated alterations to the Welsh language are unclear. The language categories of schools have no basis in law and it is confusing for parents when a regulated alteration is required to alter the nature of linguistic provision that does not change the language category of a school. Changes to linguistic provision should have their own regulations rather than being tied up with the Code.

Welsh Government's Response: All significant changes to education provision known as regulated alterations are set out in the School Standards and Organisation (Wales) Act 2013 ("the 2013 Act"). Statutory procedures are required to make such changes to schools. This includes an enlargement of the premises of a school which would increase the capacity of the school by at least 25% or 200 pupils and the addition, removal or any change in the type of SEN provision.

The procedures are designed to enable necessary changes to be made, but in a way which protects the interests of learners and allows interested parties the opportunity to have their say in the process. The Welsh Government has no plans to relax these requirements.

In terms of Welsh language provision the 2013 Act and the Code describe changes to primary schools in terms of increasing or decreasing the percentage of teaching time in English or Welsh. Changes to secondary schools are described in terms of increasing or decreasing the number of subjects taught through the medium of English or Welsh.

We are not persuaded that separate legislation is needed for proposals to change the language medium of a school. We will monitor the situation but are not persuaded that amending legislation is necessary currently.

“Defining schools according to Welsh medium provision” provides guidance and sets out descriptions and categories of schools according to the amount of Welsh used. We always aim to provide clear guidance and were concerned to hear that this guidance is causing confusion when considered against regulated alterations to increase or decrease the percentage of teaching in Welsh or English. We will investigate this matter further to determine whether revisions to the guidance are necessary.

Timing of statutory publication and determination periods - Two respondents requested that the 16 week period in which a local authority must determine a proposal be extended. Another requested that the 7 day period after determination for the publication of the objection report and issue of the decision letter be extended to within 14 days of determination to allow for a call in period of Cabinet decisions.

One respondent suggested that the requirement for the statutory notice to be distributed to pupils should be reworded similar to the consultation process i.e. to pupils where this is appropriate and practicable or relevant to their age.

Welsh Government Response: The 2013 Act requires proposers to determine a proposal within 16 weeks of the end of the objection period and to notify Welsh Ministers of the determination within 7 days of making it. This suggestion is outside the scope of the consultation on the Code as an amendment would be needed to the 2013 Act. We will monitor the situation but we are not persuaded that amending the 2013 Act is necessary currently.

The Code requires that notices are provided to schools to distribute to pupils and parents. The Code states: *“The notice must be published: By providing any school which is the subject of proposals with copies of the notice to distribute to pupils, parents, carers and guardians, and staff members (the schools may distribute the notice by email);”*

To ensure the procedures are open and fair pupils, parents and other interested parties must be made aware when a notice is published and the objection period starts. We have considered alternative ways of doing this but believe that continuing the current distribution arrangements is the simplest and most effective method of ensuring that all pupils and parents of the affected schools are notified.

Possible presumption against changing the character of a school - One respondent was concerned that there appears to be a presumption against changing the character of a community school to a school having a religious character as they felt that this might represent a way to increase the effectiveness and viability of a school.

Welsh Government Response: The School Standards and Organisation (Wales) Act 2013 does not permit a community school to have a religious character. In order to become a school with a religious character the school would have to close and a voluntary school be

established in its place. If there is unmet demand for places for education provision with a religious character the relevant religious body should approach the local authority with a view to working together on assessing the demand and if necessary bring forward a proposal. If the governing body, head teacher, staff and parents of an existing community school wish their school to have a religious character they should discuss the matter with the local authority and relevant religious body. If the local authority is in agreement it can bring forward a proposal to close the community school in consultation with the relevant religious body establish a voluntary school with a religious character.

Referrals to Welsh Ministers - One respondent felt that there were inequalities in that governing bodies of voluntary or foundation schools subject to a proposal approved or rejected by a local authority can refer the decision to Welsh Ministers for consideration, but governing bodies of community schools cannot. They also felt there should be greater clarity around procedures following a referral to Welsh Government and expected timescales expected and that the Welsh Government should be required to inform Local Authorities that a referral has been submitted.

Welsh Government Response: The bodies that can refer local authority decisions to Welsh Ministers are described in the School Standards and Organisation (Wales) Act 2013. The governing bodies of voluntary and foundation schools are included because although the schools are maintained by the local authority there are often historic differences. The school buildings and school site may not be owned by the local authority, the school may have a religious character and the governing body may be responsible for admissions to the school. We do not propose to change the 2013 Act.

We will consider amending the Code to provide further guidance on referrals to the Welsh Ministers. We recognise that it is an oversight of the Code that there is no requirement for either the body referring the decision or the Welsh Government to inform the local authority that a referral has been made to Welsh Ministers. We will amend the Code accordingly.

Guidance on compliance with the Code - One local authority suggested that the guidance should prescribe exactly what Estyn require to be provided in proposals as Estyn has previously been critical of a lack of detail presented in some proposals regarding pupil and school outcomes, etc.

Welsh Government Response: Under section 3.4 of the revised Code proposers must provide an analysis of the likely impact of the proposal on the quality of the five Estyn inspection areas - standards, teaching and learning experience, care support and guidance and leadership and management. The Code is clear that the consultation process should include sufficient reasons and information for particular proposals to enable intelligent consideration and response. It is for proposers to undertake their own assessment of the proposal against the key factors. We believe that it would be too prescriptive to produce a Code as prescriptive as suggested could rightly be criticised as reducing consultation to a "tick box" exercise.

If Estyn has been critical of the local authority's response to this part of the Code the local authority should use that feedback to improve future consultation documents seeking further clarification and assistance from Estyn as necessary.

School redundancies - 3 school unions considered that the number of possible redundancies at a school should be included within the factors to be taken into account when considering a school organisation in section 1 of the Code.

Welsh Government's response: The factors included in the Code are reflective of the Welsh Government's commitment to increase school effectiveness and narrow inequalities in achievement between advantaged and disadvantaged areas. The Code is clear that relevant bodies should place the interests of learners above all others. Whilst we acknowledge that staff redundancies will be a major consideration for local authorities do not consider that this should be a factor to be included in the Code.

Local authorities are responsible for planning provision to meet the needs of their learners. School governing bodies are responsible for staffing issues, ensuring that there are sufficient teachers to enable the school to deliver the curriculum.

Streamlined process for small schools with less than 10 pupils - Several respondents considered that the threshold of fewer than 10 registered pupils to trigger the speedier process within the current school organisation code is too low. One suggested that this should be set at 25-30 full-time pupils.

Welsh Government response: The suggestion that the definition of small school be extended is outside the scope of the consultation on the Code. The Welsh Government has no plans to revise this currently.

2. Way forward

The Welsh Government would like to take this opportunity to thank everyone who took the time to respond to this consultation. The draft Code will now be amended to reflect consultation responses. In line with section 39 of the School Standards and Organisation (Wales) Act 2013 it will then be laid before the National Assembly for Wales for 40 days, following which it can come into force unless the National Assembly for Wales resolves not to approve it. Subject to this procedure the 2nd version of the School Organisation Code is expected to be published in the autumn to come into force before the end of the year.

3. List of respondents

Owen Hathaway, NUT Cymru
Julie Hadley, Rhondda Cynon Taf CBC
Mark Horton, Torfaen CBC
Zenna Griffiths, Ceredigion CC
Sally Holland, Children's Commissioner for Wales
Rob Williams, NAHT Cymru
Tim Pratt, ASCL Cymru
Sue Richards, Caerphilly CBC
Philip Manghan, The Catholic Education Service
E J Humphreys, Newtown and Llanllwchaiarn Town Council
E J Humphreys, Churchstoke Community Council
Sarah Astley, Powys County Council
Claire Homard, Flintshire County Council
Huw Jones, Pembrokeshire county Council
Hedd Thomas, Gwynedd County Council
Emrys Bebb, Anglesey Council
Elizabeth Williams, Voice Cymru (the Union)
Michaela Benjamin, Estyn
Sam MacNamara, Governors Wales
Annette Daley, Diocese of Monmouth
Rowan Fergusan, The National Society (Church of England & Church in Wales)
Mary van den Heuvel, National Education Union Cymru, ATL Section
Deborah Weston, Newport City Council
Paul Egan, Llandough Community Council
Rev Mark Beaton, Gladestry CiW Primary School board of governors
Ceri Hoffrock, St Davids CiW VA Primary School
Hattie Budd
Louise Whitgreave, Headteacher Eyton Primary School
Rosalind Williams, Diocese of St Asaph
Rita Price, Catholic Diocese of Wrexham Education Service
Rebecca Williams, UCAC
Debbie Thomas, National Deaf Children's Society Cymru
Neal Green, Charity Commission
Alison Alexander – Clerk, Trefnant Community Council
Dafydd Jones, Bodorgan Community Group
Huw Williams & Clare Hardy, Geldards LLP
Gail Bennett, Llanbister Community Council
Nancy Matthews
Susan Huyton , Eyton Primary School, Wrexham
Kelly Small, Swansea City Council
Huw Rowlands, Ysgol Dyffryn Ial
Angie Price, Barry Town Council
Suzanne Van Loock, Head of Ysgol Llanbedr and Ysol Trefnant
Del Morgan, Un Lais Cymru/One Voice Wales
Julie Baddock, Ysgol Llanbedr (governing body)
Jennie Downes, Nannerch Primary School
Rhian Jones, Beaumaris Primary School
Richard Gordon, Neath Port Talbot Council
Rex Phillips, NASWT Cymru
Gaynor Purcell, St Chad's Primary School
The Rt Hon Alun Michael, Police and Crime Commissioner South Wales
The remaining respondents asked to remain anonymous

Annex A: List of rural schools

School Ref	School Name	Local Authority
6602133	Ysgol Gymuned Bodffordd	Sir Ynys Mon - Isle of Anglesey
6602135	Ysgol Gymuned Bryngwran	Sir Ynys Mon - Isle of Anglesey
6602141	Ysgol Gynradd Garreglefn	Sir Ynys Mon - Isle of Anglesey
6602142	Ysgol Gymuned Y Ffridd	Sir Ynys Mon - Isle of Anglesey
6602145	Ysgol Gymuned Moelfre	Sir Ynys Mon - Isle of Anglesey
6602146	Ysgol Gynradd Llanbedrgoch	Sir Ynys Mon - Isle of Anglesey
6602153	Ysgol Gymuned Llanfechell	Sir Ynys Mon - Isle of Anglesey
6602155	Ysgol Gynradd Llangoed	Sir Ynys Mon - Isle of Anglesey
6602156	Ysgol Henblas	Sir Ynys Mon - Isle of Anglesey
6602157	Ysgol Gymuned Llannerch-Y-Medd	Sir Ynys Mon - Isle of Anglesey
6602160	Ysgol Pencarnisiog	Sir Ynys Mon - Isle of Anglesey
6602162	Ysgol Penysarn	Sir Ynys Mon - Isle of Anglesey
6602163	Ysgol Santes Gwenfaen	Sir Ynys Mon - Isle of Anglesey
6602165	Ysgol Gynradd Rhosybol	Sir Ynys Mon - Isle of Anglesey
6602173	Ysgol Gynradd Y Tywyn	Sir Ynys Mon - Isle of Anglesey
6602227	Ysgol Rhy y Llan	Sir Ynys Mon - Isle of Anglesey
6605200	Ysgol Caergeiliog	Sir Ynys Mon - Isle of Anglesey
6612008	Ysgol Gynradd Abererch	Gwynedd - Gwynedd
6612010	Ysgol Beddgelert	Gwynedd - Gwynedd
6612015	Ysgol Gynradd Borth-Y-Gest	Gwynedd - Gwynedd
6612017	Ysgol Brynaerau	Gwynedd - Gwynedd
6612036	Ysgol Gynradd Chwilog	Gwynedd - Gwynedd
6612039	Ysgol Crud-Y-Werin	Gwynedd - Gwynedd
6612046	Ysgol Gynradd Edern	Gwynedd - Gwynedd
6612048	Ysgol Bro Plenydd	Gwynedd - Gwynedd
6612049	Ysgol Gynradd Garndolbenmaen	Gwynedd - Gwynedd
6612059	Ysgol Gynradd Llanaelhaearn	Gwynedd - Gwynedd
6612060	Ysgol Gynradd Llanbedrog	Gwynedd - Gwynedd
6612066	Ysgol Gynradd Llangybi	Gwynedd - Gwynedd
6612070	Ysgol Gynradd Llanllyfni	Gwynedd - Gwynedd
6612075	Ysgol Babanod Morfa Nefyn	Gwynedd - Gwynedd
6612078	Ysgol Baladeulyn	Gwynedd - Gwynedd
6612081	Ysgol Gynradd Nebo	Gwynedd - Gwynedd
6612093	Ysgol Gynradd Pentreuchaf	Gwynedd - Gwynedd
6612103	Ysgol Sarn Bach	Gwynedd - Gwynedd
6612110	Ysgol Y Gorlan	Gwynedd - Gwynedd
6612111	Ysgol Yr Eifl	Gwynedd - Gwynedd
6612112	Ysgol Gynradd Tudweiliog	Gwynedd - Gwynedd
6612185	Ysgol Gynradd Dyffryn Dulas	Gwynedd - Gwynedd
6612189	Ysgol Gynradd Dyffryn Ardudwy	Gwynedd - Gwynedd
6612190	Ysgol Bro Cynfal	Gwynedd - Gwynedd

6612192	Ysgol Edmwnd Prys	Gwynedd - Gwynedd
6612194	Ysgol Gynradd Llanbedr	Gwynedd - Gwynedd
6612198	Ysgol Y Garreg	Gwynedd - Gwynedd
6612199	Ysgol O M Edwards	Gwynedd - Gwynedd
6612207	Ysgol Gynradd Pennal	Gwynedd - Gwynedd
6612210	Ysgol Talsarnau	Gwynedd - Gwynedd
6612211	Ysgol Gynradd Tanygrisiau	Gwynedd - Gwynedd
6612213	Ysgol Bro Hedd Wyn	Gwynedd - Gwynedd
6612214	Ysgol Bro Tryweryn	Gwynedd - Gwynedd
6612220	Ysgol Ffridd Y Llyn	Gwynedd - Gwynedd
6612228	Ysgol Craig y Deryn	Gwynedd - Gwynedd
6612229	Ysgol Bro Llifon	Gwynedd - Gwynedd
6613004	Ysgol Pont Y Gof	Gwynedd - Gwynedd
6613010	Ysgol Foel Gron	Gwynedd - Gwynedd
6613018	Ysgol Gynradd Llandwrog	Gwynedd - Gwynedd
6613023	Ysgol Gynradd Llanystumdwy	Gwynedd - Gwynedd
6622012	Ysgol Betws Y Coed	Conwy - Conwy
6622043	Ysgol Dolwyddelan	Conwy - Conwy
6622086	Ysgol Penmachno	Conwy - Conwy
6622107	Ysgol Tal-y-Bont	Conwy - Conwy
6622123	Ysgol Cerrigydrudion	Conwy - Conwy
6622222	Ysgol Capel Garmon	Conwy - Conwy
6622270	Ysgol Pentrefoelas	Conwy - Conwy
6623021	Ysgol Llangelynnin	Conwy - Conwy
6623032	Ysgol Ysbyty Ifan	Conwy - Conwy
6623039	Ysgol Llanddoged	Conwy - Conwy
6623340	Ysgol y Plas	Conwy - Conwy
6632070	Ysgol Bofari	Sir Ddinbych – Denbighshire
6632124	Ysgol Cefn Meiriadog	Sir Ddinbych – Denbighshire
6632164	Ysgol Gellifor	Sir Ddinbych – Denbighshire
6632168	Ysgol Pentrecelyn	Sir Ddinbych - Denbighshire
6632214	Ysgol Betws Gwerful Goch	Sir Ddinbych - Denbighshire
6632216	Ysgol Caer Drewyn	Sir Ddinbych - Denbighshire
6632267	Ysgol Bro Dyfrdwy	Sir Ddinbych - Denbighshire
6633044	Ysgol Llanbedr	Sir Ddinbych - Denbighshire
6633045	Ysgol Llanfair Dyffryn Clwyd	Sir Ddinbych - Denbighshire
6633057	Ysgol Pant Pastynog	Sir Ddinbych - Denbighshire
6642050	Rhos Helyg C.P. School	Sir y Fflint – Flintshire
6642064	Ysgol Y Foel	Sir y Fflint – Flintshire
6642065	Brynford C.P. School	Sir y Fflint - Flintshire
6652140	Llanarmon C.P. School	Wreccsam - Wrexham
6653042	Eyton V.C. School	Wreccsam – Wrexham
6653054	Borderbrook V.C. School	Wreccsam – Wrexham
6653326	St Chad's V.A. School	Wreccsam – Wrexham

6653347	St Paul's V.A.School	Wreccsam – Wrexham
6662002	Abermule C.P. School	Powys – Powys
6662003	Arddleen C.P. School	Powys – Powys
6662004	Ysgol Gynradd Gymunedol Dyffryn Banw	Powys – Powys
6662005	Berriew C.P. School	Powys – Powys
6662008	Caersws C.P. School	Powys – Powys
6662009	Ysgol Gynradd Carno	Powys – Powys
6662018	Leighton C.P. School	Powys – Powys
6662019	Ysgol Llanbrynmair	Powys – Powys
6662020	Llandinam C.P. School	Powys – Powys
6662021	Ysgol Gynradd Llanfair Caereinion	Powys – Powys
6662033	Meifod C.P. School	Powys – Powys
6662041	Ysgol Pontrobert	Powys – Powys
6662044	Ysgol Dyffryn Trannon	Powys – Powys
6662049	Guilsfield C.P. School	Powys – Powys
6662051	Buttington Trewern C.P. School	Powys – Powys
6662053	Brynhafren C.P. School	Powys – Powys
6662054	Churchstoke C.P. School	Powys – Powys
6662057	Ysgol Gynradd Llanfyllin	Powys – Powys
6662058	Ysgol Gynradd Glantwymyn	Powys – Powys
6662059	Ysgol Pennant	Powys – Powys
6662066	Franksbridge C.P. School	Powys – Powys
6662068	Llanbister C.P. School	Powys – Powys
6662071	Llanfihangel Rhydithon C.P. School	Powys – Powys
6662076	Radnor Valley C.P. School	Powys – Powys
6662077	Crossgates C.P. School	Powys – Powys
6662084	Ysgol Dolafon	Powys – Powys
6662092	Sennybridge C.P. School	Powys – Powys
6662115	Cradoc C.P. School	Powys – Powys
6662122	Irfon Valley C.P. School	Powys – Powys
6662129	Ysgol Rhiw Bechan	Powys – Powys
6662146	Llanrhaeadr Ym Mochnant C.P. School	Powys – Powys
6663000	Llanfechain V.C. School	Powys – Powys
6663002	Montgomery V.C. School	Powys – Powys
6663016	Forden V.C. School	Powys – Powys
6663021	Llandysilio V.C. School	Powys – Powys
6663022	Castle Caereinion V.C. School	Powys – Powys
6663026	Gladestry V.C. School	Powys – Powys
6663031	Newbridge-On-Wye V.C. School	Powys – Powys
6663033	Clyro V.C. School	Powys – Powys
6663036	Rhayader V.C. School	Powys – Powys
6663037	Llanelwedd V.C. School	Powys – Powys
6663046	Llangedwyn V.C. School	Powys – Powys

6663301	St. Michael's V.A. School	Powys – Powys
6663303	Llansantffraid V.A. School	Powys – Powys
6663316	Llanbedr V.A. School	Powys – Powys
6663317	Archdeacon Griffiths V.A. Primary School	Powys – Powys
6665200	Ysgol Gynradd Llanerfyl	Powys – Powys
6672284	Ysgol Gymunedol Cilcennin	Sir Ceredigion - Ceredigion
6672285	Ysgol Gymunedol Ciliau Parc	Sir Ceredigion - Ceredigion
6672288	Ysgol Gymunedol Dihewyd	Sir Ceredigion - Ceredigion
6672289	Ysgol Gymunedol Felinfach	Sir Ceredigion - Ceredigion
6672291	Ysgol Gymunedol Llanarth	Sir Ceredigion - Ceredigion
6672293	Ysgol Gymunedol Llannon	Sir Ceredigion - Ceredigion
6672298	Ysgol Gymunedol Talgarreg	Sir Ceredigion - Ceredigion
6672303	Ysgol Gymunedol Comins Coch	Sir Ceredigion - Ceredigion
6672308	Ysgol Gymunedol Llanfarian	Sir Ceredigion - Ceredigion
6672309	Ysgol Gymunedol Llanfihangel-Y-Creuddyn	Sir Ceredigion - Ceredigion
6672310	Ysgol Gymunedol Llangwryfon	Sir Ceredigion - Ceredigion
6672311	Ysgol Gymunedol Llanilar	Sir Ceredigion - Ceredigion
6672312	Ysgol Gymunedol Mynach	Sir Ceredigion - Ceredigion
6672313	Ysgol Gymunedol Penllwyn	Sir Ceredigion - Ceredigion
6672315	Ysgol Gymunedol Syr John Rhys	Sir Ceredigion - Ceredigion
6672316	Ysgol Gymunedol Rhydypennau	Sir Ceredigion - Ceredigion
6672317	Ysgol Gymunedol Talybont	Sir Ceredigion - Ceredigion
6672320	Ysgol Gymunedol Beulah	Sir Ceredigion - Ceredigion
6672323	Ysgol Gymunedol Llechryd	Sir Ceredigion - Ceredigion
6672324	Ysgol Gymunedol Penparc	Sir Ceredigion - Ceredigion
6672345	Ysgol Gymunedol Trewen	Sir Ceredigion - Ceredigion
6672353	Ysgol Gymunedol Pontrhydfendigaid	Sir Ceredigion - Ceredigion
6672362	Ysgol Gymunedol Craig Yr Wylfa	Sir Ceredigion - Ceredigion
6672363	Ysgol Gymunedol Penrhyncoch	Sir Ceredigion - Ceredigion
6672366	Ysgol Gymunedol Y Dderi	Sir Ceredigion - Ceredigion
6672367	Ysgol Gymunedol Cenarth	Sir Ceredigion - Ceredigion
6672369	Ysgol Bro Sion Cwilt	Sir Ceredigion - Ceredigion
6672371	Ysgol Gynradd T Llew Jones	Sir Ceredigion - Ceredigion
6672372	Ysgol Rhos Helyg	Sir Ceredigion - Ceredigion
6672373	Ysgol Dyffrfryn Cledlyn	Sir Ceredigion - Ceredigion
6673058	Ysgol Wirfoddol Myfenydd	Sir Ceredigion - Ceredigion
6682209	Ysgol Gymunedol Eglwysrwr	Sir Benfro - Pembrokeshire
6682223	Ysgol Brynconin	Sir Benfro - Pembrokeshire
6682231	Ysgol Llanychllwydog	Sir Benfro - Pembrokeshire
6682233	Ysgol Gymunedol Maenclochog	Sir Benfro - Pembrokeshire
6682250	Puncheston C.P. School	Sir Benfro - Pembrokeshire
6682253	St Dogmaels C.P. School	Sir Benfro - Pembrokeshire

6682254	Wolfscastle C.P. School	Sir Benfro - Pembrokeshire
6682261	Templeton C.P. School	Sir Benfro - Pembrokeshire
6682266	Tavernspite C.P. School	Sir Benfro - Pembrokeshire
6682270	Ysgol Gymunedol Croesgoch	Sir Benfro - Pembrokeshire
6682273	Roch C.P. School	Sir Benfro - Pembrokeshire
6682384	Coastlands C.P. School	Sir Benfro - Pembrokeshire
6682385	Ysgol Clydau	Sir Benfro - Pembrokeshire
6682390	Ysgol y Frenni	Sir Benfro - Pembrokeshire
6683035	Cilgerran V.C. School	Sir Benfro - Pembrokeshire
6683036	Cosheston V.C. School	Sir Benfro - Pembrokeshire
6683050	Spittal V.C. School	Sir Benfro - Pembrokeshire
6683058	Ger Y Llan V.C. School	Sir Benfro – Pembrokeshire
6683315	St.Aidan's V.A. School	Sir Benfro – Pembrokeshire
6683321	St Oswalds V.A. School	Sir Benfro – Pembrokeshire
6692002	Maesybont C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692014	Ysgol Gynradd Peniel	Sir Gaerfyrddin – Carmarthenshire
6692034	Bancyfelin C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692037	Meidrim C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692065	Talley C.P School	Sir Gaerfyrddin – Carmarthenshire
6692067	Cwrt Henri C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692080	Llangadog C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692104	Ysgol Gynradd Brynsaron	Sir Gaerfyrddin – Carmarthenshire
6692109	Llanpumsaint C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692119	Llanmiloe C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692166	Ysgol Llansteffan	Sir Gaerfyrddin – Carmarthenshire
6692170	Abernant C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692180	Ysgol Beca	Sir Gaerfyrddin – Carmarthenshire
6692182	Ysgol Gynradd Hafodwenog	Sir Gaerfyrddin – Carmarthenshire
6692184	Llanybydder C.P. School	Sir Gaerfyrddin – Carmarthenshire
6692185	Ysgol y Fro	Sir Gaerfyrddin – Carmarthenshire
6692187	Cynwyl Elfed School	Sir Gaerfyrddin – Carmarthenshire
6692384	Ysgol Griffith Jones	Sir Gaerfyrddin - Carmarthenshire
6692386	Ysgol Carreg Hirfaen	Sir Gaerfyrddin - Carmarthenshire
6692387	Ysgol Cae'r Felin	Sir Gaerfyrddin - Carmarthenshire
6692389	Ysgol Bro Brynach	Sir Gaerfyrddin - Carmarthenshire
6693000	Abergwili V.C. School	Sir Gaerfyrddin - Carmarthenshire
6693002	Tremoilet V.C. School	Sir Gaerfyrddin - Carmarthenshire
6693003	Laugharne V.C. School	Sir Gaerfyrddin - Carmarthenshire
6693013	Ferryside V.C. School	Sir Gaerfyrddin - Carmarthenshire
6693026	Ysgol Gynradd Wirfoddol Llanllwni	Sir Gaerfyrddin - Carmarthenshire
6693307	Ysgol Wirfoddol Penboyr	Sir Gaerfyrddin - Carmarthenshire
6702133	Ysgol Gynradd Felindre	Sir Abertawe - Swansea
6702167	Penclawdd C.P. School	Sir Abertawe - Swansea
6702217	Knelston C.P. School	Sir Abertawe - Swansea

6722275	Tynyrheol C.P. School	Sir Pen y bont - Bridgend
6732126	Llancafán C.P. School	Sir Morgannwg - The Vale of Glamorgan -
6742269	Tref-y-Rhyg C.P. School	Sir Rhondda Cynnon Taf - Rhondda Cynon Taf
6762108	Fochriw C.P.School	Sir Caerffili - Caerphilly
6792305	Cross Ash C. P. School	Sir Fynwy - Monmouthshire