



Objection Report

on the Proposed Amalgamation of

Ysgol Babanod Mochdre and Ysgol Cystennin

Mochdre, Conwy

January 2024

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Mae'r ddogfen hon ar gael yn Gymraeg hefyd.

1. Statutory Notice

1.1 Publication of the Statutory Notice

On 7th November 2023, following Cabinet approval (10th October 2023), Conwy County Borough Council issued a Closure Notice, stating that Conwy County Borough Council propose to establish a new English Medium, mixed sex school for Mochdre to be maintained by Conwy County Borough Council on the sites of the existing Ysgol Babanod Mochdre and Ysgol Cystennin schools, for children aged 3-11 from 1st September 2024.

As a result of the proposals outlined Ysgol Babanod Mochdre and Ysgol Cystennin would be discontinued from 31st August 2024.

This started a notice period of 28 days which allowed any interested stakeholder the opportunity to submit their views on the proposal.

The notice period began on the 7th of November 2023 and ended on the 5th of December 2023.

The consultation has been conducted in accordance with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, which details the required actions that must be undertaken as part of the process.

This document will set out the steps taken during the Notice Period, refer to responses received and will aim to answer and tackle queries that have been put to the Authority.

Conwy sent copies of the Statutory Notice by email link giving details of how to make any comments on the proposal. The Statutory Notice was displayed at the school gates of Ysgol Babanod Mochdre and Ysgol Cystennin and was also published on the Conwy County Borough Council webpages bilingually along with all other documentation regarding the Proposal.

A reminder was also sent via e-mail on the 27th of November 2023 reminding stakeholders of the closing date for any comments/objections.

The table below sets out the list of recipients who received a copy of the Consultation Document, in accordance with the School Organisation Code.

Name/Organisation
Parents, carers and guardians, teachers & staff of Ysgol Babanod Mochdre & Ysgol Cystennin
Governors of Ysgol Babanod Mochdre & Ysgol Cystennin
Headteacher & Governors of Ysgol Pen y Bryn, Ysgol Llandrillo yn Rhos and Ysgol Awel y Mynydd
Church in Wales Diocese of St Asaph & Roman Catholic Diocese of Wrexham
Denbighshire County Council Education Services
Gwynedd County Council Education Services
Welsh Minister for Education & Skills
Welsh Government Schools Management and Effectiveness Division
Assembly Member & Member of Parliament representing area subject to proposals
Local Conwy Councillor for Mochdre
Mochdre Community Council
Estyn
Teaching & Staff Trade Unions
GWE
Police & Crime Commissioner for North Wales
Conwy CYPP
Conwy Community First
Flying Start Conwy

2. Objections

Under section 49 of the 2013 Act when objections have been received proposers must publish a summary of the statutory objections and the proposer's response to those objections ("the Objection Report"). This must take place:

(a) in the case of a local authority that is required to determine its own proposals under section 53 of the Act, before the end of 7 days beginning with the day of its determination: and

(b) in all other cases, before the end of 28 days beginning with the end of the objection period.

In total 1 response was received to the proposal from the National Education Union via e-mail which closed midnight on the 5th of December 2023.

There were no responses received via post or via the online form.

The Statutory Notice web page on Conwy's website was viewed 42 times by 34 unique visitors between the 7th of November 2023 and the 5th of December 2023.

A response was received from the National Education Union, which stated

“While in principle the National Education Union does not have objections to school amalgamations, we have concerns about some of the statements in the consultation document, together with the effects it will have on staffing and educational standards.”

Although not classed as objections, Conwy have prepared responses in section 3 of this report.

The National Education Union response is included at the end of this report under point 6.

3. Authority Response to the objections/comments

The comments received have been shown in the following table, along with Conwy’s response.

Objection / Comment	Authority Response
<p>Continuity of education and curriculum for pupils, transferring from Foundation Phase to Key Stage 2, reducing transitional dips in pupil performance. The Union would question the evidence base for this statement?</p>	<p>Several the benefits listed for the amalgamation are also benefits seen from federations and can be found in Welsh Government’s report <i>“Federation process of maintained schools in Wales - Guidance for governing bodies and local authorities.”</i></p>
<p>Enhanced opportunities for staff professional development. To increase staff skills across both schools and to ensure that curriculum planning and resource sharing raising pupil standards and outcomes. The Union would question the evidence base for this statement?</p>	<p>Several the benefits listed for the amalgamation are also benefits seen from federations and can be found in Welsh Government’s report <i>“Federation process of maintained schools in Wales - Guidance for governing bodies and local authorities.”</i></p>
<p>Staffing implications, potential staff redeployment and/or redundancies. The Union is concerned that at the consultation stage the level of funding that the new school will receive as regards the old schools was not made clear. Undoubtedly if budget cuts which were shown on documents to the Cabinet are true this will lead to job cuts and will have an effect on educational standards.</p>	<p>Whilst it is understandable that financial implications and potential budget cuts are significant considerations, it is important to note that consultations aim to capture a diverse range of perspectives to enable informed decisions to be made. Details of the financial implications of the proposal were published in the Consultation Report to Cabinet and on-line in advance of publication of the Statutory Notice.</p> <p>The Statutory Notice period allows for anyone to formally object to the proposal for any reason</p> <p>Conwy is committed to ensuring that education for Mochdre is appropriately</p>

	and effectively planned and managed in the current economic climate.
<p>Effect on Staff If amalgamated, the two schools the Temporary Governing Body will work with the Headteacher and in liaison with Education Human Resources officers in establishing the staffing structure for the new school. These proposals will provide a greater opportunity for staff development of skills over the whole primary age curriculum and potential for more specialist staffing and management structures in the all-through school.</p> <p>The Union would question the evidence base for this statement? The Union is concerned that a budget reduction would have the inverse effect reducing opportunities for staff development.</p>	<p>Several the benefits listed are also benefits seen from federations and can be found in Welsh Government's report <i>"Federation process of maintained schools in Wales - Guidance for governing bodies and local authorities."</i></p> <p>Whilst budget cuts do present challenges for all schools, proactive and strategic approaches, exploring cost-effective options and promoting a culture of shared learning can help sustain and enhance development opportunities for staff.</p>
<p>Amalgamation would build upon the work that the headteacher, staff and governing bodies have already started in order to improve school standards further. This good work could be more easily built upon; collaboration providing the following potential benefits for pupils standards, enhanced provision, leadership and management:</p> <p>The statement from the Local Authority seems to indicate that good work was being carried out at the school. If this is the case, why has the school been put into a follow up category?</p>	<p>The Local Authority recognises that the headteacher, staff and governing bodies have already started to work closer together in order to improve school standards. Until the final and official report is published on the 18th December 2023 it would be inappropriate for the Local Authority to comment wider on the recent Estyn Inspection outcomes.</p> <p>However, the schools will be working closely with all partners to continue to improve standards and it would be fair to expect that the work which will be undertaken will be done so across both schools to address Estyn's recommendations which are identical for both schools and therefore will require close collaborative positive partnerships in order to achieve progress.</p>
<p>The Union is concerned that even with transitional funding the budget would be less which inevitably will lead to a reduction in staff. Once transitional relief was over the reduction would be considerable and in our opinion lead to staffing reductions. If the school was a single site school we would not have the same concerns, however, due to the fact that this is on two sites additional funding is needed.</p>	<p>After reviewing the post amalgamation funding, Education Officers asked Cabinet to review the current Transitional funding model, which was agreed in August 2013 and recognises the inability to achieve the financial benefits of being on a single site, to address the potential impact on schools in the current economic climate.</p> <p>The proposed amendments, if agreed by Cabinet, would allow a longer period</p>

	of transitional protection to assist schools.
In addition, the Union is also concerned about the following which we received in reply as regards the proposed merger. Our original questions are in black, the reply in red and our comments in blue.	
<p>Why during the consultation were these figures not made clear? Availability of these figures may well have influenced the responses. It is unacceptable that these figures were not available during the consultation.</p> <p>As part of the amalgamation process revised school funding is a consideration and something we work closely with the school and the governors on.</p> <p>The estimated new School funding allocation was not available to us at the start of the consultation process however the consultation document did make reference to the financial aspects of the proposal, acknowledging their importance in the context of the proposal and referenced that there would be a reduction in allocation, without giving actual figures.</p> <p>As per the School Organisation Code, any responses during the Consultation are not regarded as formal objections. To have responses considered as statutory objections they must be made in writing or by email within the 28-day objection period.</p> <p>The statutory notice (and Objection) period will start if Cabinet agree to continue with the amalgamation process following their October meeting. The Statutory Notice period will run for 28 days from publication and allow for anyone to make a formal objection to the proposal. The proposal will be determined by the Authority at the end of this period. An objection report will be published as part of this process.</p> <p>It must be questioned whether it is wise to proceed with a consultation without knowing the exact financial consequences.</p>	<p>After reviewing the post amalgamation funding, Education Officers asked Cabinet to review the current Transitional funding model, which was agreed in August 2013 and recognises the inability to achieve the financial benefits of being on a single site, to address the potential impact on schools in the current economic climate.</p> <p>The proposed amendments, if agreed by Cabinet, would allow a longer period of transitional protection to assist schools.</p>
How will the new school will manage the budget reduction? As a Union, we don't think it fair to put the onus on the school	As mentioned previously, managing the school budget is the responsibility of each school and their governing body.

<p>due to the fact that the amalgamation is driven by the Local Authority.</p> <p>Managing the school budget is the responsibility of each school and their governing body, however in circumstances where amalgamation takes place we engage with the school and it's governing body to discuss, assist and provide advice on options the school may wish to consider.</p> <p>The Union is concerned that the budget reduction will make it difficult for the Governing Body to keep the same level of staffing and hence educational standards.</p>	<p>Conwy is committed to engaging with the school and its governing body in this process to discuss, assist and provide advice on options the school may wish to consider due to changes in budgets and as also mentioned above, have asked that Cabinet review the existing Transitional Protection arrangements.</p>
<p>What will the number of FTE teachers be at the new combined school as opposed to the individual schools?</p> <p>Current 'FTE Through Formula' = Babanod 2.2 & Cystennin 2.62 = 4.82</p> <p>Amalgamation 1 school 4.24 FTE.</p> <p>Therefore a reduction of .58 FE</p> <p>The school staffed above the current funded level at 7.2 FTE.</p> <p>The Councillors need to be aware that while amalgamation will result in a FTE equivalent of 4.24 across both sites. We would ask the Local Authority to demonstrate how this will be workable and the effects it may have on the provision of education at the school?</p>	<p>It is the role of school leaders to undertake whole school organisation, strategy and development providing overall strategic leadership and, with others, lead, develop and support the strategic direction, vision, values, and priorities of the school.</p> <p>There are various means through which the Local Authority can demonstrate positive effects that amalgamation can bring.</p> <ul style="list-style-type: none"> • Along with the focus from the recent inspection it would be anticipated that the Post Inspection process will improve academic provision, outcomes and achievements, this will become more evident over time as the process continues • Resource optimisation such as shared facilities, area of learning expertise and technology, broader curriculum coverage and activities due to the combined resources of the schools, • Improved pupil progress support due to closer collaboration of teachers and support staff, • Increased community involvement and engagement through joint initiatives and events facilitated by an amalgamation,

	<ul style="list-style-type: none"> • Potential streamlined administrative demands which in-turn would contribute to effective school management, • Potential facility improvements or upgrades which would provide a better learning environment for pupils and colleagues. <p>These are just some of the elements which the Local Authority would hope to be able to demonstrate in time.</p> <p>Also, as previously mentioned, transitional protection will be in place to recognise that the full benefits of an amalgamated staff model cannot be delivered initially and to mitigate against it whilst the school carry out work to achieve a revised structure.</p>
<p>What will be the effects on the educational standards at the amalgamated school following the overall budget reduction? (This is marked as ‘Savings’ in the Conwy County Borough Council report) Regarding this, we would look at any evidence that you have provided to support your views.</p> <p>As we always do in Conwy, we work closely with our schools to ensure that educational standards remain high and are maintained during any school reorganization.</p> <p>The Union questions how the Local Authority can be confident that educational standards will remain high?</p> <p>The Union questions whether previous amalgamations have led to the maintenance of high educational standards?</p>	<p>The Local Authority would respond that each situation is different and experiences of previous amalgamations will differ to future amalgamations. Skilled leadership and personal relations handling are a key factor in successful amalgamations.</p> <p>Communication is key and the Local Authority and supporting Regional Consortia will work closely with the schools continue to work towards addressing their Estyn recommendations in terms of improving pupil progress and thereafter maintaining educational standards.</p>

4. ESTYN Feedback

ESTYN did not provide any feedback at this stage but did respond during the initial consultation to say that “Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area.”

ESTYN’s full response at the consultation stage can be viewed on the following webpage: <https://www.conwy.gov.uk/en/Resident/Education-and-Families/Education-Consultations/Proposal-to-amalgamate-Ysgol-Babanod-Mochdre-and-Ysgol-Cystennin.aspx>

5. Cabinet Decision

Conwy County Borough Council Cabinet Members met on the 10th of October 2023 to discuss the proposed amalgamation of Ysgol Babanod Mochdre and Ysgol Cystennin and gave approval to formally publish the Statutory Notice (for the amalgamation of Ysgol Babanod Mochdre and Ysgol Cystennin).

This started a notice period of 28 days which allowed any interested stakeholder the opportunity to submit their views on the proposal.

The notice period began on the 7th of November 2023 and ended on the 5th of December 2023.

The decision on whether to formally amalgamate Ysgol Babanod Mochdre and Ysgol Cystennin will go before Conwy Cabinet 23rd of January 2024.

6. National Education Union response

Dear Lowri,

While in principle the National Education Union does not have objections to school amalgamations, we have concerns about some of the statements in the consultation document, together with the effects it will have on staffing and educational standards. Please find the relevant sections from the statutory document below, together with our concerns, highlighted in blue.

Section 1.1

The expected advantages and disadvantages of the Proposal to amalgamate Ysgol Babanod Mochdre and Ysgol Cystennin have been considered by Education Services and are identified in the table below.

- a. Continuity of education and curriculum for pupils, transferring from Foundation Phase to Key Stage 2, reducing transitional dips in pupil performance. **The Union would question the evidence base for this statement?**
- b. Enhanced opportunities for staff professional development. To increase staff skills across both schools and to ensure that curriculum planning and resource sharing raising pupil standards and outcomes. **The Union would question the evidence base for this statement?**
- c. Staffing implications, potential staff redeployment and/or redundancies. **The Union is concerned that at the consultation stage the level of funding that the new school will receive as regards the old schools was not made clear. Undoubtedly if budget cuts which were shown on documents to the Cabinet are true this will lead to job cuts and will have an effect on educational standards.**

Section 2.3 Effect on Staff

Effect on Staff If amalgamated, the two schools the Temporary Governing Body will work with the Headteacher and in liaison with Education Human Resources officers in establishing the staffing structure for the new school. These proposals will provide a greater opportunity for staff development of skills over the whole primary age curriculum and potential for more specialist staffing and management structures in the all-through school. **The Union would question the evidence base for this statement? The Union is concerned that a budget reduction would have the inverse effect reducing opportunities for staff development.**

Section 3.1 Curriculum

Amalgamation would build upon the work that the headteacher, staff and governing bodies have already started in order to improve school standards further. This good work could be more easily built upon; collaboration providing the following potential benefits for pupils standards, enhanced provision, leadership and management: **The statement from the Local Authority seems to indicate that good work was being carried out at the school. If this is the case, why has the school been put into a follow up category?**

Section 4. Finance

Ysgol Babanod Mochdre and Cystennin will be funded on the same formula as other schools if they are part of an amalgamation. As part of the Council's funding formula, schools are funded on the number of pupils and on other non-teaching costs. If the schools were to be merged to become a single school, the formula would calculate a single budget which would be smaller than the budget of operating as two separate schools. The new school would in the first year, receive additional funding of 50% of the difference between the funding of the new school and the original two schools and in the second year receive additional funding of 25% of the difference between the funding of the new school and the original two schools. In subsequent years, there would be no additional funding and the new school would be funded as one school. The revenue costs for running Ysgol Babanod Mochdre during the 2022/23 financial year were £277,000 with the cost per pupil figure of £5,380. For Ysgol Cystennin the revenue costs for running the school during the 2022/23 financial year were £366,000 with the cost per pupil figure of £4,753. One of the drivers for amalgamation is equality of funding for pupils and through the amalgamation of infants and junior schools the cost per pupil figure for the Mochdre Area will be rationalised. The average cost per pupil in Conwy is £4,215. **The Union is concerned that even with transitional funding the budget would be less which inevitably will lead to a reduction in staff. Once transitional relief was over the reduction would be considerable and in our opinion lead to staffing reductions. If the school was a single site school we would not have the same concerns, however, due to the fact that this is on two sites additional funding is needed.**

In addition, the Union is also concerned about the following which we received in reply from Mr John Davies as regards the proposed merger. Our original questions are in black, Mr Davies reply in red and our comments in blue.

Why during the consultation were these figures not made clear? Availability of these figures may well have influenced the responses. It is unacceptable that these figures were not available during the consultation.

As part of the amalgamation process revised school funding is a consideration and something we work closely with the school and the governors on.

The estimated new School funding allocation was not available to us at the start of the consultation process however the consultation document did make reference to the financial aspects of the proposal, acknowledging their importance in the context of the proposal and referenced that there would be a reduction in allocation, without giving actual figures.

As per the School Organisation Code, any responses during the Consultation are not regarded as formal objections. To have responses considered as statutory objections they must be made in writing or by email within the 28-day objection period.

The statutory notice (and Objection) period will start if Cabinet agree to continue with the amalgamation process following their October meeting. The Statutory Notice period will run

for 28 days from publication and allow for anyone to make a formal objection to the proposal. The proposal will be determined by the Authority at the end of this period. An objection report will be published as part of this process.

It must be questioned whether it is wise to proceed with a consultation without knowing the exact financial consequences.

How will the new school will manage the budget reduction? As a Union, we don't think it fair to put the onus on the school due to the fact that the amalgamation is driven by the Local Authority.

Managing the school budget is the responsibility of each school and their governing body, however in circumstances where amalgamation takes place we engage with the school and it's governing body to discuss, assist and provide advice on options the school may wish to consider.

The Union is concerned that the budget reduction will make it difficult for the Governing Body to keep the same level of staffing and hence educational standards.

What will the number of FTE teachers be at the new combined school as opposed to the individual schools?

Current 'FTE Through Formula' = Babanod 2.2 & Cystennin 2.62 = 4.82

Amalgamation 1 school 4.24 FTE. Therefore a reduction of .58 FE

The school staffed above the current funded level at 7.2 FTE.

The Councillors need to be aware that while amalgamation will result in a FTE equivalent of 4.24 across both sites. We would ask the Local Authority to demonstrate how this will be workable and the effects it may have on the provision of education at the school?

What will be the effects on the educational standards at the amalgamated school following the overall budget reduction? (This is marked as 'Savings' in the Conwy County Borough Council report) Regarding this, we would look at any evidence that you have provided to support your views.

As we always do in Conwy, we work closely with our schools to ensure that educational standards remain high and are maintained during any school reorganization.

The Union questions how the Local Authority can be confident that educational standards will remain high? The Union questions whether previous amalgamations have led to the maintenance of high educational standards?