



# CONSULTATION REPORT

Proposal to Reorganise Canolfan Enfys Specialist Provision

Reorganising Canolfan Enfys to place the provision under the management of Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025

September 2024

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## 1. Introduction

- 1.1 Following the end of a school organisation consultation period, the Welsh Government's School Organisation Code requires the proposer (the Council) to publish a consultation report. In this document the proposer is required to:
  - Summarise each of the issues raised by consultees;
  - responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons;
  - setting out Estyn's response to the consultation in full; and
  - responding to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.
- 1.2 The results from the consultation process should be considered by decision-makers prior to determining any recommendation relating to the proposal.

# 2.0 The Proposal and Consultation

2.1 On Thursday 21st November 2023, Cabinet resolved to:

Open a period of formal consultation with key stakeholders to reorganise Canolfan Enfys to place the provision under the management of Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025, with a future report to be provided to Cabinet.

- 2.2 The Council proposes to deliver this increase in nominal capacity by:
  - Reorganising the provision at Canolfan Enfys under the management of Ysgol Pen Coch whilst maintaining both provisions on their current sites.
- 2.3 Consultation was carried out in accordance with the School Organisation Code. The consultation period ran from, Wednesday 5<sup>th</sup> June 2024 and ended, Tuesday 16<sup>th</sup> July 2024.
- 2.4 In accordance with the code, the consultation documents were published on Flintshire County Council's website, Wednesday 5<sup>th</sup> June 2024, and a link to the consultation documents was provided to stakeholders. A complete list of recipients can be found in **Appendix A**.
- 2.5 Age-appropriate versions of the consultation document, for children and young people, were also published on the Flintshire County Council website. All versions of the consultation documents can be found in the School Modernisation section page on the Flintshire County Council website at the following link:

https://www.flintshire.gov.uk/en/Resident/Schools/School-Modernisation-Related/Canolfan-Enfys.aspx

2.6 Hard copies were available on request at Canolfan Enfys, Ysgol Pen Coch and Plas Derwen.

- 2.7 A post box was made available at Canolfan Enfys, Ysgol Pen Coch and Plas Derwen for consultation responses to be posted and collected by a member of the School Modernisation Team.
- 2.8 The Council produced a response document (standard response form) to assist and encourage people to give their views. This formed part of the consultation document and was also published on the Council's website. The children and young people's version of the consultation document contained an adapted more user-friendly response form. The consultation response form was converted into an online survey using the Smart Survey online tool. Links to the survey and a QR code were also published on the website.
- 2.9 All consultees received an e-mail with the link directing them to the formal consultation document, supplementary documents, and also the link to the online survey on the first day of the consultation 5<sup>th</sup> June, 2024.
- 2.10 Documents were produced in both Welsh and English.

## 3.0 Consultation events/meetings

3.1 Consultation events were not held as part of this process. Instead, questions could be submitted by e-mail, with Council Officers providing a response within 7 days.

## 4.0 **Consultation responses**

- 4.1 The Council received 80 responses during the consultation period submitted through the online standard consultation form. 47 of these were fully completed responses.
- 4.2 School pupil voice sessions were considered but it was felt that due to the social, emotional and communication difficulties of the pupils attending each provision this was not practical.
- 4.3 In addition, a formal response was submitted from Estyn, the full response from Estyn is set out in **Appendix B.**
- 4.4 The table below show the methods people used to respond to the consultation:

Method of contact	Number of Contacts Received
Consultation Standard Response Forms (all online)	79
Children & Young People's Response Forms	0
Letters and E-mails	0
Children and Young People Letters and E-mails	0
School Council Responses - email	0
School Governors Responses (no formal response from GB	0
but some Governors filled in the online form counted above)	
Union Response	0
Estyn Response	1
AM and MP Response	0
Total number of contacts	80

## 5.0 School Pupil Response

5.1 School pupil voice sessions were considered but it was felt that due to the social, emotional and communication difficulties of the pupils attending each provision this was not practical.

# 6.0 Response from Estyn

6.1 The main points made by Estyn in response to the proposal and the Council's response to them are set out below. The full response received from Estyn is set out in **Appendix B.** 

Estyn Comment	FCC Response
The proposal sets out suitably the range of alternate options considered and makes sensible conclusions based on the Council's assessment of these. The proposal states that changes will have a limited impact on the local environment, for example on home to school transport, as most pupils currently use the school minibus to attend school. However, while transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change.	There would be no change to travel times as pupils would continue to attend the same provision in the same location using their current method of transport.
The proposal considers the implications for governance, stating that that responsibility will move from the Management Committee at Plas Derwen (PRU) to the governing body at Ysgol Pen Coch. It recognises the main impact on staffing being the Headteacher from Ysgol Pen Coch taking on the day-to-day running of Canolfan Enfys with the support of the current leadership team at both settings. The proposal identifies the risks of a change in leadership and highlights the current arrangements for support between the two settings and a review of working practices in the future.	Noted
However, the local authority is not clear enough about the potential impact of the proposal on pupils' standards of learning nor on their well-being.	Ysgol Pen Coch has significant experience of educating children will a similar range of complex needs, with many of the children attending Canolfan Enfys transferring to placements at Ysgol Pen Coch. The change of leadership will allow for strategies used within the specialist school to be implemented at an earlier point, enabling the children to benefit from these at the start of their educational placement at the centre.

	Ysgol Pen Coch has access to a wide range of resources and equipment that can be shared in response to pupil's needs to support their access to the curriculum. Existing collaboration between Ysgol Pen Coch and Canolfan Enfys has already identified areas of focus including enhancing the learning environment, strategies to develop pupil communication skills and implementation of an effective assessment system. Implementation of the proposal will allow for the continued focus on these and provide for access to additional time, expertise and resource to develop and embed effective practice in these areas.
The proposals be further strengthened by including further detail regarding how staff will work together to bring about improvements and with more specific reference to the mentioned review of working practices to identify timescales and potential foci.	Staff at Canolfan Enfys will access training alongside colleagues at Ysgol Pen Coch to further develop their knowledge and expertise to meet the needs of the children within the centre. This will be through access to training events, staff shadowing and also the modelling of effective interventions and strategies. There is a level of collaboration between Canolfan Enfys and Ysgol Pen Coch already in place. Implementation of the proposal will allow for an initial review of staff skillsets and training needs which can then be built into the continued professional development programme for Ysgol Pen Coch. The further development of the staff knowledge, skills and understanding, the curriculum offer along with adaptations to the learning environment will provide for an enhanced learning experience for the children which will impact not only on their levels of engagement and outcomes but also on their well-being.

6.2 The response from Estyn sets out its view that the proposal is likely to maintain the standard of provision in the area.

# 7.0 Standard Response forms

- 7.1 The standard response form was designed to establish:
  - the capacity in which they were responding;

- whether or not people were in favour of the proposal and any comments they wish to make;
- the effect on opportunities to use the Welsh Language;
- whether they wanted to be notified of publication of the consultation report;
- Equalities Information.
- 7.2 On the response forms, we asked people to confirm whether they were responding as a parent, a prospective parent, teacher, governor, member of the community or other. Further details of the respondents are set out in **Appendix C.**
- 7.3 Over half of the responses were from staff associated with the provisions at 52%. 29% of responses were received from current parents, carers and guardians.
- 7.4 91% of respondents agreed with the proposal. Of those that did not agree with the proposal 3 were current parents and 2 were members of staff associated with the provisions.
- 7.5 Respondents were able to provide additional comments on whether they did or did not support the proposal. An analysis of the frequency of issues being raised within the comments section and those from Estyn is below. The responses have been grouped into the categories which should be taken into account by relevant bodies when exercising their functions of preparing and publishing school organisation proposals, or approving/determining them.

CONS	ULTEE RESPONSES	No
1.	Resourcing of Education and other Financial Implications	
•	Concerns that Ysgol Pen Coch is already understaffed and underfinanced. Lack of detail in the proposal about how staff will be utilised. Concerns that they will be asked to do more without suitable compensation. Depends on whether Ysgol Pen Coch is extended properly to accommodate additional pupils. Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch. Concern that Ysgol Pen Coch struggle to manage the behaviour of the children they currently have so adding more will increase the issue. Further reassurances required that Canolfan Enfys will be retained on the current Mold site.	6
2.	Need for places and the Impact on Accessibility of schools	
•	More specialist places for children in mainstream requiring support. Many pupils feed into Ysgol Pen Coch already. It would be good to spread pupils across two sites rather than keep them all on one.	13
3.	Quality and Standards of Education	

•	Pen Coch better aligned with Canolfan Enfys than Plas Derwen (PRU) The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys. Recommended teaching and learning strategies are consistent across both settings. Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch. The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being (Estyn response)	17
4.	Community Impact	
•	While transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change (Estyn response) The local authority has not provided a Community Impact Assessment as part of this proposal (Estyn response)	1
5.	Welsh in Education Strategic Plan	
•	The local authority outlines that the proposal would not provide for additional Welsh medium primary school places. However, the local authority has not provided a Welsh Language Impact Assessment as part of this proposal (Estyn response)	1
6.	Equalities/Anti Poverty Impact	<u> </u>
•	No comments were received regarding this area.	0
<u>.</u>		

7.6 A full summary analysis of the responses received via the standard response form is set out in **Appendix C**, the Councils responses to these can be found at **Appendix D**.

## 8.0 Responses from Assembly Members and Members of Parliament

8.1 No responses were received from AMs/MPs.

## 9.0 Responses from Governors

9.1 In total 5 responses were received during the consultation period from Governors. All Governors who completed the standard consultation response form were in support of the proposal.

## 10 Next Steps

10.1 Flintshire County Council Cabinet Members will meet on 15<sup>th</sup> October 2024 to discuss the proposal to reorganise Canolfan Enfys and place the provision under the management of Ysgol Pen Coch increasing the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025. Having been provided with the information gathered through the Consultation, the decision will be taken by Cabinet whether to continue to the Statutory Notice for determining the proposal. This consists of a 28 day formal Objection Period whereby any objections to the proposal must be made in writing or by email. Following this the Cabinet will then need to consider another report, summarising any objections received and decide whether or not to proceed to implementation.

10.2 Any comments made against the proposal during the consultation period will not be treated as objections. If any consultees wish to object this must be done in writing during the objection period. Information on how to do this will be clearly stated on the Statutory Notice in due course.

# APPENDIX A

## Consultation Document (Adult and Children's and Young People Versions); Transport Assessment, Equality and Welsh Language Impact Assessment, Community Impact Assessment Recipient List

This formal consultation document was sent to a wide range of consultees including:

Requirement under the Organisational Code 011/2018	It will be distributed to
School community	The Headteacher, teachers and staff of Ysgol Pen Coch.
	Teachers and staff at Canolfan Enfys.
	Pupils at Ysgol Pen Coch and Canolfan Enfys.
	Parents, carers, and guardians (and where possible prospective parents, carers and guardians) of pupils attending Ysgol Pen Coch and Canolfan Enfys.
	The Headteacher, teachers, staff of Plas Derwen (Pupil Referral Unit)
the maintaining or proposed maintaining authority for any school likely to be affected by the proposals;	Flintshire County Council is submitting the proposal
any other local authority likely to be affected - including in the case of dedicated Special Education Need (SEN)/Additional Learning Need (ALN) provision any authority placing or likely to place statemented pupils in it;	
the Church in Wales and Roman Catholic Diocesan Authority for the area in which any school likely to be affected is located;	
any other appropriate religious body for any school likely to be affected by the proposals;	
The governing body any school which is the subject of the proposals and of other schools likely to be affected by the proposals, including those that might receive any displaced pupils.	Governing Body of Ysgol Pen Coch Management Committee of Plas Derwen (Pupil Referral Unit)
The governing body of other schools which the proposer considers are likely to be affected by the proposals;	Governing Body of Maes Hyfryd
The Welsh Ministers.	
Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by/intended to be served by any school which is the subject of the proposals.	Rob Roberts Hannah Blythyn
Estyn.	Chief Inspector of Education and Training in Wales
Teaching and staff trade unions representing teachers and other staff at any school which is the subject of the proposals.	Representatives of NASUWT; NEU; UCAC; ASCL; UNISON
The relevant Regional Education Consortium.	GwE advisor for Plas Derwen/Pen Coch
The relevant Regional Transport Consortium.	

The Police and Crime Commissioner for the area served	Police Commissioner for North Wales
by/intended to be served by any school which is the subject of the proposals.	
Any community or town council for the area served by/	Flint Town Council
intended to be served by any school which is the	Mold Town Council
subject of the proposals	
The local Communities First Partnership (in relevant	
areas).	
In the case of proposals affecting nursery provision, any	
independent providers who may be affected;	
In the case of proposals affecting nursery provision, the	Early Years Wales
Children and Young People's Partnership and/or the	PACEY
Early Years Development and Childcare Partnerships	
where present.	
In the case of proposals affecting Special Education	Betsi Cadwaladr University Health Board
Need/Additional Learning Need provision, any relevant	
health or third sector bodies with an interest.	
In the case of proposals affecting secondary provision,	
any further education institutions serving the area of	
the school.	
In the case of proposals affecting secondary provision,	
parents of pupils attending primary schools from which pupils normally transfer to that secondary school.	
In the case of proposals affecting Welsh language	
provision, the Welsh Language Commissioner.	
Other	All Flintshire Council Councillors
	1

#### **APPENDIX B**

#### Estyn response to proposal

#### Proposal to Reorganise Canolfan Enfys Specialist Provision

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales. Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

#### Summary/Conclusion

This consultation is as a result of Flintshire Council's proposal to reorganise Canolfan Enfys and move the provision from under the current management of Plas Derwen (Pupil Referral Unit) to management by Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1st March 2025.

This proposal outlines the Council's commitment to respond to findings from the Estyn Inspection in October 2022. In order to address the recommendations of this report, the Council considers that this provision will benefit from the more suitable support and leadership that can be provided by Ysgol Pen Coch.

Estyn considers that the proposal is likely to maintain the standard of education provision in the area. However, the proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being

#### Description and benefits

The proposal states clearly the rationale for reorganising the provision to utilise the expertise of staff and improve standards at Canolfan Enfys.

The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access additional information online, through QR codes or via email directly to the Council. However, it does not include a consultation workshop, instead directing attention to a direct email for questions. The proposal includes clear dates for the consultation and a deadline for responses to be received.

The proposal sets out suitably the range of alternate options considered and makes sensible conclusions based on the Council's assessment of these. The proposal states that changes will have a limited impact on the local environment, for example on home to school transport, as most pupils currently use the school minibus to attend school. However, while transport arrangements would be kept the same, the

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## **APPENDIX C**

## Summary of responses to Standard Response Forms

Q1	E Add chart Text Analysis Customise	е	
What is your interest/relationship with Ysgol Pen Coch/Canolfan Enfys?			
Answer Choices	Responses		
Parent, carer or guardian	28.99%	20	
Prospective parent, carer or guardian	4.35%	3	
Governor	7.25%	5	
Member of staff	52.17%	36	
Member of the community	5.80%	4	
Other (please specify): Show	8.70%	6	
Answered: 69 Skipped: 10	Response Total:	69	

\*Respondents were able to respond in more than one capacity. This explains why the total answered does not tally.

**Comments:** Over half of respondents were members of staff associated with the provisions. The results do not break the percentage down into staff members from individual schools. The 8.7% who responded through the 'other' category were a combination of health professionals, supply staff and a member of staff from a feeder school to Ysgol Pen Coch.

Q2	E Add chart Customise		
Do you support the proposal to reorganise the provision at Canolfan Enfys and move it from under the current management of Plas Derwen (PRU) to being under the management of Ysgol Pen Coch increasing the nominal capacity of Ysgol Pen Coch from 98 to 128 by March 2025.			
Answer Choices	Responses		
Yes	91.07% 51		
No	8.93% 5		
Answered: 56 Skipped: 23	Response Total: 56		

**Comments:** 91% of respondents agree with the proposal. Those who did not and left comments as to why they did not agree cited concerns about resources being spread thinly across two sites and the impact of the proposal on individual job roles and the location of work.

Theme	No	Example Comments
Positive response to need for additional spaces	10	<ul> <li>An increase in the amount of pupils also means more places for children who need it.</li> <li>There are so many children incorrectly placed in mainstream school settings who need more a specialist setting but there is not enough room. Increasing the amount of pupils who can attend this school is absolutely essential.</li> <li>There is a lack of spaces in Flintshire for children with special needs. My child had to wait many months before a space became available at Pen Coch.</li> <li>At Ysgol Pen Coch we are at full capacity so it would be a good idea to spread the numbers across both sites.</li> </ul>
Positive response to impact on teaching and learning	20	<ul> <li>The staff at Canolfan Enfys are fantastic with the Children and I feel that with the more specific expertise Pen Coch can offer it will give them the opportunity to be able to offer the Children more appropriate opportunities and education.</li> <li>We are all specialists staff, our expertise should be shared to support the children and other specialist staff.</li> <li>Ysgol Pen coch has a huge amount of experience and a strong leadership team that can, I feel, develop the unit in line with the systems/processes in place at Ysgol Pen Coch and thereby creating a nurturing environment for the pupils attending the unit to assessed and prepared for entry into either a mainstream or sen school life.</li> <li>From my experience, the cohort of children attending Canolfan Enfys in the past 2-3 years especially, have presented with similar needs to children attending Pen Coch. My assessment approaches and subsequent targets, as well as classroom strategies recommended are not dissimilar across the two schools. From a professional and service level, this change would not affect SLT input as the way we organise and input into the two schools is the same.</li> <li>Canolfan Enfys is not a PRU provision and would be much better suited to links to Pen Coch. The staff team at CE would benefit from the support of being part of the YPC staff team, to access skills and expertise of staff experiencing the same challenges. Will also provide a smoother transition for pupils from Pen Coch have a much better understanding of the needs of these pupils that PRU leaders and will therefore be able to offer stronger support and leadership to the provision.</li> <li>The needs of the pupils and diagnosis are additional learning needs that require the support and processes in place trom a specialist all school rather than a Pru. Many pupils feed into ypc from Canalfon Enfys and the support to can provide will only be if benefits to the pupils in both schools.</li> </ul>

		<ul> <li>I think the two schools working together would be great. They both have their own things that make them great schools and working together would give children with additional needs an amazing chance.</li> <li>Easier access to information / guidance for staff members if needed. The children will benefit from enhanced learning opportunities and resources that Pen Coch have to offer.</li> </ul>
Concerns with proposal	6	<ul> <li>The council need to ensure parents are aware of anything that may change under this new management, ahead of it happening.</li> <li>Am I to assume this mean splitting staff across two site? I am cynical that this is in the best interests of the pupils. Your document does not provide any details of changes other than a very broad, will now fall under the management of YPC. In an attempt to obfuscate; the real reason is revealed. To save money by getting YPC staff to do more without compensating them.</li> <li>Ysgol pen coch is already understaffed and under funded this will stretch resources even further.</li> <li>Depends whether the school is extended appropriately to accommodate.</li> <li>I would like some further assurance that our jobs are secure in Mold.</li> <li>Concerns remain regarding the logistics of two sites as this has been tried before, but learning from that experience and that of Plas Derwen oversight, I feel that this should be workable.</li> </ul>

## Appendix D - Summary of Responses from Consultation

The Council received **48** full responses responses during the consultation period submitted through the online standard consultation form including a formal response from Estyn. There were an additional **32** partial responses meaning an overall total of **80** responses.

	Do you support the proposal to reorganise the provision at Canolfan Enfys and move it from under the curr			
What is your interest/relationship with Ysgol Pen Coch/Canolfan Enfys?		Yes	No	Row Totals
	Parent, carer or guardian	14 25.0%	3 60.0%	17 27.9%
	Prospective parent, carer or guardian	3 5.4%	0 0.0%	3 4.9%
	Governor	2 3.6%	0 0.0%	2 3.3%
	Member of staff	28 50.0%	2 40.0%	30 49.2%
	Member of the community	3 5.4%	0 0.0%	3 4.9%
	Other (please specify):	6 10.7%	0 0.0%	6 9.8%
	Column	56	5	61
	Total	91.8%	8.2%	100%

## Summary of responses to Standard Response Forms

#### **KEY FACTS**

- 91% agreed with the proposal.
- Those who disagreed were current parent/carers and members of staff.
- Over half of respondents were current members of staff.
- Over a quarter of respondents were current parents, carers or guardians.

## Appendix D - Responses and observations from FCC on comments received (including formal Estyn response)

In the online standard response form respondents were given the opportunity to provide comments on whether they did or did not support the proposal. 33 additional comments were made, of those who made comments 28 were in agreement to the proposal, while 5 were not. The responses have been grouped, by the highest frequency of comment, and into the categories which **should** be taken into account by relevant bodies when exercising their functions of preparing and publishing school organisation proposals, or approving/determining them.

CONSULTEE RESPONSES	No	FCC Response
1. Resourcing of Education and other Financial Implications		
<ul> <li>Concerns that Ysgol Pen Coch is already understaffed and underfinanced.</li> <li>Lack of detail in the proposal about how staff will be utilised. Concerns that they will be asked to do more without suitable compensation.</li> <li>Depends on whether Ysgol Pen Coch is extended properly to accommodate additional pupils.</li> <li>Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch.</li> <li>Further reassurances required that Canolfan Enfys will be retained on the current Mold site.</li> <li>Clarification required about how staff will work together to bring about improvements (Estyn)</li> </ul>	6	The set up of both Ysgol Pen Coch and Canolfan Enfys will remain as is with staff continuing to work at their current provisions in their current locations. There will be some cross-school working – similar to what currently takes place – to train and support staff with upskilling themselves in curriculum delivery. Leaders at Ysgol Pen Coch will be working with FCC representatives over the Autumn Term to determine and share further details on these working arrangements. Ongoing conversations are taking place concerning strategic options for extending Ysgol Pen Coch in the longer term. These conversations are taking place alongside leaders and governors from the school. Once the council is able to give more detail on these proposals they will do so. <b>FCC response to Estyn comments</b> – Staff at Canolfan Enfys will access training alongside colleagues at Ysgol Pen Coch to further develop their knowledge and expertise to meet the needs of the children within the centre. This will be through access to training events, staff shadowing and also the modelling of effective interventions and strategies. There is a level of collaboration between Canolfan Enfys and Ysgol Pen Coch already in place. Implementation of the proposal will allow for an initial review of staff skillsets and training needs which can then be built into the continued professional development programme for Ysgol Pen Coch. The further development of the staff knowledge, skills and understanding, The curriculum offer along with adaptations to the learning environment will provide for an enhanced

		learning experience for the children which will impact not only on their levels of engagement and outcomes but also on their well-being.
2. Need for places and the Impact on Accessibility of schools		
<ul> <li>More specialist places for children in mainstream requiring support.</li> <li>Many pupils feed into Ysgol Pen Coch already.</li> <li>It would be good to spread pupils across two sites rather than keep them all on one.</li> </ul>	13	FCC welcomes the support for the proposal. The proposal will formalise current working arrangements whilst opening up a small number of additional places.
3. Quality and Standards of Education		
<ul> <li>Pen Coch better aligned with Canolfan Enfys than Plas Derwen (PRU)</li> <li>The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys.</li> <li>Recommended teaching and learning strategies are consistent across both settings.</li> <li>Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch.</li> <li>The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being (Estyn response)</li> </ul>	17	<ul> <li>FCC welcomes the support and understanding from members of the community at both Ysgol Pen Coch and Canolfan Enfys. Members of both communities acknowledge the positive difference that this proposal will make in supporting children at Canolfan Enfys.</li> <li>FCC response to Estyn comments -</li> <li>Ysgol Pen Coch has significant experience of educating children will a similar range of complex needs, with many of the children attending Canolfan Enfys moving onto placements at Ysgol Pen Coch. The change of leadership will allow for strategies used within the specialist school to be implemented at an earlier point, enabling the children to benefit from these at the start of their educational placement at the centre.</li> <li>Ysgol Pen Coch has access to a wide range of resources and equipment that can be shared in response to pupil's needs to support their access to the curriculum. Existing collaboration between Ysgol Pen Coch and Canolfan Enfys has already identified areas of focus including enhancing the learning environment, strategies to develop pupil communication skills and implementation of an effective assessment system.</li> </ul>

4. Community Impact		Implementation of the proposal will allow for the continued focus on these and provide for access to additional time, expertise and resource to develop and embed effective practice in these areas.
<ul> <li>While transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change (Estyn response)</li> <li>The local authority has not provided a Community Impact Assessment as part of this proposal (Estyn response)</li> </ul>	1	There will be no changes to travel time or travel arrangements as this proposal is a formalisation of a working arrangement already in place. Children will continue to travel in the same way as they currently do to Canolfan Enfys and there will be no impact on this arrangement or the associated travel times.
5. Welsh in Education Strategic Plan		
• The local authority outlines that the proposal would not provide for additional Welsh medium primary school places. However, the local authority has not provided a Welsh Language Impact Assessment as part of this proposal (Estyn response)	1	This proposal does not provide any additional Welsh medium places. The FCC ALN team are continuing to work on a strategy to increase Welsh language provision for ALN pupils.
6. Equalities/Anti Poverty Impact		
No comments were received regarding this area.	0	N/A

Thank you to everyone who took part in this process.