

# INTEGRATED IMPACT ASSESSMENT

## Dee Valley Federation of Schools - Consultation

Case Ref: (IIA719912426)

The integrated impact assessment report presents information and assurance about how, when taking decisions, we have considered our duties and commitments in relation to:

- Our Council Priorities (2023 – 28)
- Our Climate and Ecological Emergency Declaration (2019) Our Involvement Strategy (2022 – 2027)
- Equality Act 2010 (including Public Sector Equality Duty, Socio-economic Duty and Procurement) Welsh Language Measure (Wales) 2011 - Policy Making Standards
- Armed Forces Act 2021
- Well-being of Future Generations (Wales) Act 2015

### Section 1 – Information about the Proposal

#### What is being assessed: Dee Valley Federation of Schools – Consultation

Type of Proposal: Service review or re-organisation which affect our services, communities or staff, Efficiency or saving proposals

Description of the proposal: overall aims, objectives and intended outcomes: This proposal seeks to consult on the following proposals for the Dee Valley Federation of Schools (Garth Community Primary School, Froncysyllte Community Primary School and Pentre Church in Wales Voluntary Controlled Primary School)

Option 1: Maintain the Status Quo. This option would mean all 3 schools in the Dee Valley Federation would continue to operate as they do now.

Option 2: Close Froncysyllte Community Primary School. This option would mean that Froncysyllte CP would close and pupils would be offered a place at an alternative school.

#### Main Stakeholders:

There is a prescribed list of stakeholders outlined in the Welsh Government's School Organisation Code 2018 which we adhere to. We also include other stakeholders over and above the list.

#### Geographical Area:

- Chirk North, Llangollen Rural

#### Data and Information used to inform the development of the proposal:

- Pupil Level Annual Census Level (PLASC) data
- Number of pupils on roll
- Pupil projections
- Surplus places data financial data

#### Key relevant findings:

Froncysyllte CP has been well below its capacity (84 pupil places) for 5 consecutive years.

There is currently 86.90% surplus capacity in Froncysyllte Community Primary school (2025). The average surplus capacity in Wrexham primary schools is 22.1%, Pupil Level Annual School Census (PLASC) data 2025.

Pupil forecasts up to 2030 are projecting a continued trend in a reduction of numbers on roll at the school.

### **How has it informed the proposal? Did it support the proposal, and how?**

Yes, the data supports the proposed intentions. By bringing this proposal forward, the Local Authority intends to address the declining numbers of pupils roll, the declining forecasts in pupil numbers and the high number of surplus places at Froncysyllte CP to protect the long-term viability of the Dee Valley Federation.

### **Other Services affected by this proposal:**

Potential impact on other service areas in Education

### **Other policies or areas of work related to this proposal:**

- Welsh Government School Organisation Code (statutory code document 011/2018).
- Welsh Government School Admissions Code
- Welsh Government Cymraeg 2050
- Welsh Government Sustainable Communities for Learning Wrexham's
- Welsh in Education Strategic Plans Wrexham's Council Plan
- Wrexham's School Organisation Framework Wrexham's School Admission Policy Wrexham's School Transport Policy

Decision-taker: Executive Board

Responsible Officer / Job Title: Dafydd Ifans / Head of Education Effectiveness & Infrastructure

Assessment Lead / Assessment Lead Job Title: Carla Hughes / Programme Manager - Access & School Places Team

Lead Member / Lead Member Portfolio: Cllr Phil Wynn / Education

## **Section 2 - Assessments**

### **Council Plan Priorities**

Our Council Plan shows how our priorities help us to deliver Wales' Well-being Goals.

This proposal impacts on the following Council Plan priorities:

Delivering Efficient Streetscene Services and Decarbonising our Environment

This report seeks permission to go out to consultation. The consultation will include questions on reducing carbon in our environment and whether the proposal will have any long lasting positive or negative impacts on reducing carbon in our environment. This information will be reported to Elected Members in a post-consultation feedback report and taken into consideration before a final decision is made.

This proposal would provide benefits to the environment in terms of producing a lower carbon footprint from reduced heating, lighting and maintenance. Fewer buildings in operation provides positive environmental impacts stemming from a reduction in and more efficient energy use, waste production and unsustainable land use.

## **Improving Education and Learning**

This proposal impacts on the following Council Plan priorities:

### **Improving Education and Learning**

In order to support our economic and well-being ambitions for Wrexham, learners of all ages have improved outcomes, are able to achieve their potential and become active participants in their community.

Our learners are supported to be engaged and aspirational; making the most of new skills, training and learning opportunities for children and young people.

Our learners should attend school on a regular basis with more children and families supported at an earlier stage, to increase attendance, improve safeguarding, reduce exclusions and improve behaviour.

Our learners actively contribute to their learning, have improved resilience, health and well-being and are supported by effective collaboration with our partners.

All learners are supported to improve their education outcomes, and inequalities in outcomes between different groups of learners will be reduced.

Our learners have a positive learning experience through access to an environment that is accessible and fit for purpose and allows a choice of Welsh and English medium education. The proposed changes would support the above priority outcome statements by:

- Providing an appropriate solution to meet local demand for school places in the areas where the schools are located
- Supporting the sustainable growth of Welsh-medium education in line with the aspirations of the Council's Welsh in Education Strategic Plan and Cymraeg 2050
- Enabling pupils to attend alternative schools which would be better equipped to meet the new Curriculum for Wales
- Enabling pupils to attend alternative schools which would provide a wider range of educational and extra-curricular opportunities
- Enabling pupils to attend a school with a larger cohort, so that pupils can be taught in class of a similar age group
- Enabling pupils to access additional opportunities for peer support and providing curriculum consistency, familiarity of leadership approaches and continuity of care for local pupils
- Improving standards of education to the benefit of all pupils in the area.

## **Carbon Impact**

Wrexham Council declared a Climate and Ecological Emergency in September 2019 and is committed to making WCBC a net zero council by 2030.

To achieve the targets and meet our commitments we need to ensure that decarbonisation is embedded into everything we do and all proposals must be assessed for their impact on carbon.

If a Carbon Impact Assessment (CIA) has been undertaken, a summary is provided below and the full CIA is appended to the report.

Has a carbon impact assessment been undertaken? No

This report seeks permission to go out to consultation. The consultation will include questions on reducing carbon in our environment and whether the proposal will have any long lasting positive or negative impacts

on reducing carbon in our environment. This proposal is likely to provide benefits to the environment in terms of producing a lower carbon footprint from reduced heating, lighting and maintenance. Fewer buildings in operation provides positive environmental impacts stemming from a reduction in and more efficient energy use, waste production and unsustainable land use.

## **Involvement**

The council's Involvement Strategy sets out the council's vision that all people will have the information they need to influence the planning and delivery of services; that we will engage and consult with all people on decisions which affect them; and where possible we will work together to design and deliver services. The Strategy supports the Gunning Principles which support fair and worthwhile involvement.

In addition Equality legislation requires us to consider the need to involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way we carry out our functions when we develop proposals and take decisions.

Have you complied with the relevant involvement requirements? Yes

Wrexham County Borough Council must comply with the School Organisation Code (statutory code document 011/2018) when undertaking any school Organisation consultations. The Statutory Code contains strict guidance that must be adhered to and is underpinned by the Gunning Principles. We routinely take The Gunning Principles and the Involvement Strategy into consideration when developing school organisation consultations which are conducted on a regular basis.

Detail of engagement and consultation undertaken:

At a formative stage, initial meetings were held with relevant stakeholders in relation to the proposal during academic year 2024-25. Further meetings are planned ahead of the Executive Board meeting on 16th September 2025. A full consultation document is provided for consultees to consider and respond to. a number of in-person and online consultation engagement sessions will be offered. The consultation runs for at least 42 days, 20 of which are school days as outlined in the School Organisation Code.

Consultees: Lead Member Local Member Headteacher Chair of Governors

Key findings and how these have been taken into account in developing the proposal. The key findings will be analysed and presented to the Executive Board in a post-consultation document.

## **Equality Act 2010**

The Equality Act provides a legal framework to protect individuals from unfair treatment and promotes a fair and more equal society.

### **The Equality Duty**

When we have proposals to introduce a new, or revise an existing, strategy, policy or practice, or make changes or cuts to a service or make strategic decisions, we are required to:

Consider the need to eliminate unlawful discrimination, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

Consider whether our proposals would have a disproportionate impact on people sharing one or more of the protected characteristics, and where this is likely to be the case we must take appropriate action to address issues identified.

The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership [in employment only], pregnancy and maternity, race, religion and belief, sex, and sexual orientation. In Wrexham Council we have also identified unpaid carers as a group to consider.

Assessment of relevance of this proposal to the Equality Duty:

The proposal seeks to eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act. It supports the General Duty to advance equality of opportunity between people who share a protected characteristic and those who do not and to foster good relations between people who share a protected characteristic and those who do not. The consultation will include engagement with the communities affected, learners and their families. An easy read / children's version of the consultation document is made available and both the main consultation document and children's document are available in a variety of formats.

The potential impacts of the decision to proceed with the proposal has due regard for advancing equality and aims to remove or minimise disadvantages experienced by the people affected due to their protected characteristics. We take steps to meet the needs of people from protected groups where these are different from the needs of other people and encouraging people with protected characteristics to participate in the consultation process where their participation is disproportionately low (for example number of accessible drop-in sessions on different times during the day and on different days of the week).

We also offer face to face and online sessions.

If the proposal has identified any potential impacts on groups who share protected characteristics these are listed below.

POSITIVE

NEGATIVE

If any actions have been identified to maximise any potential positive impacts / minimise any potential negative impacts, these are listed below.

Unlawful Discrimination

If the proposal, despite any mitigation actions identified above, will result in any unlawful discrimination as defined by the Equality Act 2010, this is identified below, along with the reasons why it can be objectively justified.

## **Socio-economic Duty**

The Socio-economic Duty means that as a local authority we have to think about how our strategic decisions, such as setting objectives and developing public services, can reduce inequalities of outcomes associated with socio economic disadvantage.

The Duty applies to both new strategic decisions and when reviewing previous strategic decisions.

Is this proposal a strategic decision requiring an assessment of potential impact and socio- economic disadvantage? No

## **Procurement**

When procuring, works, good or services we are required to consider the impact on the equality protected characteristics (including carers); impact on Welsh Language; and impact on unequal outcomes caused by socio-economic disadvantage. This is particularly important in major procurement decisions.

When procuring works, goods or services from other organisations, we must have due regard to whether it would be appropriate:

for the award criteria for that contract to include considerations to help meet the General Duty (to eliminate discrimination, promote equality of opportunity and foster good relations);

to stipulate conditions relating to the performance of the contract to help meet the three aims of the General Duty.

Does your proposal involve commissioning or procuring goods or services, either as an authority of in

commissioning/procuring partnership with others? No

## Welsh Language Standards - Policy Making

The Welsh Language Measure (Wales) 2011 declares that the Welsh Language has official status in Wales. It makes provision, through the Welsh Language Standards, to (a) promote and facilitate the use of the Welsh language, and (b) to treat Welsh language no less favourably than English language.

Policy Making Standards 88-90 and 95-97 require that we identify and consider all relevant effects on (a) and (b) and to consider how to formulate the policy / policy decision so that it would support (a) and (b).

Policy Making Standards 91-93 require that when we publish a consultation document in relation to the policy / policy decision, we include an assessment of the effects on (a) and (b) and seek views upon these, along with views on how the policy could be formulated to have no / less adverse effects, and positive / more positive effects.

This proposal complies with the Welsh Language Standards in the following ways:

Standards: Requirement to comply with Welsh Language Standards (88-90) and (95-97) in policy making

Description: A separate Welsh Language Impact Assessment has been prepared in accordance with Welsh Language Standards (88-92) in policy making.

Standards: Requirement to comply with Welsh Language Standards (91-93) when publishing a consultation document.

Description: A separate Welsh Language Impact Assessment has been prepared in accordance with Welsh Language Standards (88-92) when publishing a consultation document. Assessment of impact on the Welsh language.

A) If the proposal has identified any potential impacts on opportunities to promote the Welsh language / opportunities for people to use the Welsh language, these are listed below.

### POSITIVE

Direct or Indirect Impact: Indirect

Impact Details: The proposal could increase the number of learners accessing Welsh-medium education should they choose to attend a Welsh-medium school.

A separate Welsh Language Impact Assessment (WLIA) has been prepared in accordance with Welsh Language Standards 88-92 in policy making. The WLIA provides a full assessment of potential positive and negative impacts as a result of the proposal at hand. Please refer to Appendix 4 which accompanies the main report to Executive Board.

What evidence have you used to support this view? Consultation feedback and school admissions data will be the evidence base to ascertain whether this happens.

### NEGATIVE

If any actions have been identified to maximise any potential positive impacts / minimise any potential negative impacts, these are listed below.

If the proposal has identified any potential impacts on treating the Welsh language no less favorably than the English language, these are listed below.

### POSITIVE

Direct or Indirect Impact: Indirect

Impact Details: The proposal does not directly affect a Welsh-medium school. The Welsh language will be treated no less favourably than English as a result of the proposal. The proposal could increase the number of learners accessing Welsh-medium education should they choose to attend a Welsh-medium school.

A separate Welsh Language Impact Assessment (WLIA) has been prepared in accordance with Welsh Language Standards 88-92 in policy making. The WLIA provides a full assessment of potential positive and negative impacts as a result of the proposal at hand. Please refer to Appendix 4 which accompanies the main report to Executive Board.

What evidence have you used to support this view? The proposal does not directly affect a Welsh-medium school.

Consultation feedback and school admissions data will be the evidence base to ascertain whether this happens.

## NEGATIVE

If any actions have been identified to maximise any potential positive impacts / minimise any potential negative impacts, these are listed below.

## Armed Forces

The Armed Forces Act 2021 introduced a duty for specified bodies, including councils, when exercising certain functions, to have 'due regard' to the principles of the Armed Forces Covenant, which promises that those who serve or who have served in the Armed Forces, along with their families, should be treated fairly, and should not be disadvantaged by their service.

In relation to local authorities, these functions relate to certain housing and education services, and local authority-delivered healthcare services.

Does this proposal relate to any of the functions defined in the Act? No

## Ways of Working

The Well-being of Future Generations (Wales) Act places a duty on public bodies to carry out sustainable development – this means we must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

The Act sets out five 'ways of working' that we must consider when applying the sustainable development principle. We have considered the ways of working in the following ways:

**Involvement** – The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.

We involve an extensive number of key stakeholders including the communities served by the schools in accordance with the School Organisation Code 2018. We also adhere to the Council's Involvement Strategy and The Gunning Principles.

**Long term** – The importance of balancing the short-term needs with the need to safeguard the long-term needs.

The short-term needs are balanced with safeguarding the long-term needs of the Dee Valley Federation by making good use of the available pupil places in the area, whilst providing stability for planning and staffing the classes in the Federation.

**Prevention** – How to act to prevent problems occurring or getting worse, in order to help us meet the well-being objectives.

The proposal aims to prevent an increasing number of surplus places in the school concerned and aims to protect the viability of the Dee Valley Federation in the longer-term.

Integration – Considering how our own well-being objectives may impact upon each of the well-being goals, on our other objectives, or on the objectives of other public bodies.

The proposal will assist in ensuring learners have a positive learning experience through access to an environment that is accessible and fit for purpose and allows a choice of Welsh and English medium education and are supported by effective collaboration with our partners.

Collaboration – Acting in collaboration with any other person, partners or different parts of our own organisation to help us meet our well-being objectives. This may also help up minimise duplication and maximise benefits.

There is collaboration with the schools concerned and other schools in Wrexham, Wrexham Association of Secondary Headteachers, Primary Heads Federation, Governing Bodies and any other interested parties.

### **Section 3 - Decision Making and Review**

Note – this section will only be completed following the conclusion of the IIA.

#### **Decision to Continue**

This section records whether following the conclusion of the IIA, the Lead Officer and Responsible Officer agree that there is enough information to enable decision-makers to make an informed judgement as to whether to proceed with the proposal.

Assessment Lead Officer Recommendation: Yes Continue with proposal through to decision, taking account of any mitigating actions outlined.

Summary of reason(s) for recommendations:

Responsible Officer approval to proceed?

#### **Record of Decision**

This section records whether the proposal was accepted, and if applicable, when it was implemented.

Proposal accepted? Detail

Date of Decision Implementation Date

#### **Review**

Note: This section will only be completed following the implementation of the decision.

The impact assessment does not end when a decision is implemented. There is a legal duty to monitor the impact and / or effectiveness of actions and mitigation in relation to our Equality and Welsh Language duties, as well as considering more broadly whether the proposal has met its aims and objectives.

Review Officer:

Details of Review:

Review Date:

Details of any additional mitigation actions or improvement actions: