

Agenda – Petitions Committee

Meeting Venue:

Committee Room 3 – Senedd

Hybrid

Meeting date: 25 September 2023

Meeting time: 14.00

For further information contact:

Gareth Price – Committee Clerk

0300 200 6565

Petitions@senedd.wales

1 Introductions, apologies, substitutions and declarations of interest

(Pages 1 – 17)

2 Evidence session – P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities

Mark Harris – Home Builders Federation

3 New petitions

3.1 P-06-1341 Accessible guidance for parents and schools to help develop plans to support children with additional learning needs

(Pages 18 – 29)

3.2 P-06-1353 Devolve responsibilities and budgets for trunk roads in North Wales to North Wales

(Pages 30 – 36)

3.3 P-06-1357 Draw up a new Microplastics Action Plan for Wales

(Pages 37 – 49)

3.4 P-06-1358 Review the inadequate funding for Schools in Wales

(Pages 50 – 89)

4 Updates to previous petitions



- 4.1 P-06-1209 Create a national list of all unpaid carers in Wales
(Pages 90 – 93)
- 4.2 P-06-1262 Welsh Government to hold a public inquiry into decisions taken by them before & during the pandemic
(Pages 94 – 96)
- 4.3 P-06-1288 Deliver Magor and Undy Walkway Station, part of the Burns Delivery Programme, as a quick win
(Pages 97 – 98)
- 4.4 P-06-1348 Commission suitable NHS services in Wales for people with EDS or hypermobility spectrum disorders
(Pages 99 – 104)
- 5 Paper to note – P-06-1344 Moderate quality agricultural land (grade 3b) should be used for food security not solar farms
(Pages 105 – 113)**
- 6 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**
- 7 Discussion of evidence – P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities**

Document is Restricted

P-06-1341: Accessible guidance for parents and schools to help develop plans to support children with additional learning needs

Y Pwyllgor Deisebau | 25 Medi 2023
Petitions Committee | 25 September 2023

Reference: SR23/5997-3

Petition Number: P-06-1341

Petition title: Accessible guidance for parents and schools to help develop plans to support children with additional learning needs.

Petition text: There are around 1,400 children and young people with type 1 diabetes in Wales. Children living with such disabilities need support in school to manage their condition and ensure they reach their full potential. As a mother, I'm one of many parents whose type 1 diabetic children don't receive the support they need because of a lack of understanding of funding to support the care required in school. I and others have experienced a deficiency of care support, and I am seeking to change this.

More details: I'm frustrated with the lack of access for dedicated support; without it, type 1 diabetes can have life-threatening complications. The Equality Act 2010 legally defines children with diabetes as people living with a disability. Education Institutions such as schools must ensure that students living with diabetes are not disadvantaged.

No matter how confident the child is, children are not able to be trained on insulin pumps until the age of eleven, and with children being diagnosed from birth onwards, support between Nursery to Primary School is even more essential to help manage their diabetes.

Additional Learning Needs and Education Tribunal (Wales) 2018 Act is a welcomed step; however, it is only now being implemented. The new



legislation has brought in a statutory measure called Individual Development Plans to support students by developing a supportive framework to ensure that their academic, physical, and support needs are met.

I'm asking our Government to review current guidance for the new ALN legislation to increase school/Local Authority participation by creating accessible format guides and support that reduces the barrier to access.

1. Summary

- This petition discusses two issues, which are distinct although related to some extent.
- Diabetes is a healthcare need, which needs to be managed so that it does not negatively affect a child's learning in school. The Welsh Government has issued guidance for schools, local authorities and health professionals on Supporting learners with healthcare needs. Some learners with healthcare needs have an Individual Healthcare Plan (IHP).
- Where a child meets the definition of Additional Learning Needs (ALN), they are entitled to an Individual Development Plan (IDP). A healthcare need, such as diabetes, may result in ALN although this will not necessarily be the case and only if the definition is met. This is that the child or young person has a significantly greater difficulty in learning than the majority of learners of the same age, or they have a disability which prevents or hinders them from accessing the education or training generally on offer; **and** this calls for Additional Learning Provision (ALP).
- There is therefore no automatic connection between diabetes and ALN. Schools should use the guidance on Supporting learners with healthcare needs to help them manage the impact that a child's diabetes may have on their education. Where the child also has ALN, schools and local authorities have duties under the Additional Learning Needs and Education Tribunal (Wales) Act 2018 and the Additional Learning Needs Code.

2. Supporting learners with healthcare needs

In 2017, the Welsh Government published [guidance on Supporting learners with healthcare needs](#). This includes both statutory guidance (which schools and local authorities must have regard to) and non-statutory advice. It replaced previous non-statutory guidance from 2010 and was published during the Senedd's scrutiny of the Additional Learning Needs and Education Tribunal (Wales) Bill (see section 2.3 of this briefing).

The guidance sets out the following key points:

- Learners with healthcare needs should be properly supported so that they have full access to education, including trips and physical education.
- Governing bodies must ensure that arrangements are in place to support learners with healthcare needs.
- Governing bodies should ensure that education setting staff consult the relevant professionals, learners and parents to ensure the needs of the learner with healthcare needs are properly understood and effectively supported.

The guidance also states:

Healthcare issues affect each learner individually and support from the education setting may have an impact on their quality of life and future chances. Therefore, governing bodies and headteachers should ensure arrangements focus on meeting the needs specific to the learner and consider how this impacts on their education, attainment and well-being. Arrangements should give learners and parents confidence that provision is suitable and effective.

2.1. Individual Healthcare Plans

Some learners with healthcare needs require an Individual Healthcare Plan (IHP). These set out what support the learner requires and the arrangements for this.

The guidance says "IHPs are essential where healthcare needs are complex, fluctuating, long term or where there is a high risk that an emergency intervention will be needed". It also includes a link to an [IHP template produced by Diabetes UK](#).

schools

According to the guidance, “it is vital that learners and parents are actively involved in the planning of support and management of healthcare needs”. It also says parents and learners should

be involved in the creation, development and review of an IHP (if any). The parent and learner may be best placed to provide information about how their healthcare needs affect them. They should be fully involved in discussions about how the learner’s healthcare needs will be met in the education setting, and contribute to the development of, and compliance with, their IHP.

2.2. Information guides

The Welsh Government has produced a [series of information materials](#) regarding support for learners with healthcare needs, including a guide for [teaching staff](#), [parents](#) and [young people](#).

Senedd Research has recently published an [article on diabetes](#), which provides more general information.

2.3. Relevance to Additional Learning Needs

The relationship between healthcare needs, or medical needs as they are also referred to, featured in the [Fifth Senedd’s Children, Young People and Education \(CYPE\) Committee scrutiny of the ALN Bill](#) in 2017.

The Committee noted that the ALN system does not apply to pupils with healthcare needs just because of that healthcare need, and only if they have ALN. However, the Committee amended the definition of ALN in section 2 of the Bill (subsequently Act) to reflect that a child’s ALN may result from a medical need, although they would still need to satisfy the criteria within that definition of ALN.

For further discussion of this, see Senedd Research’s summary of [the Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#), the [CYPE Committee’s report on the Bill](#) and details of the [Senedd’s scrutiny of the Bill](#).

3. Additional Learning Needs

Pupils who have learning difficulties or disabilities that require Additional Learning Provision are identified as having Additional Learning Needs (ALN) or Special

Educational Needs (SEN). Under reforms made by the [Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#), the existing/previous SEN system is being replaced by the new ALN system.

The new ALN system is being introduced on a phased basis over four years (September 2021 to August 2025). All learners newly identified with ALN come under the new system, while those already supported with SEN are [transferring over in different years](#), depending on their year group and level of intervention (whether or not they have a statement of SEN). As such, both the existing/previous SEN system and new ALN system are operating side by side, until August 2025.

3.1. Defining ALN

Learners judged to have ALN are eligible for a statutory Individual Development Plan (IDP). The 2018 Act's [definition](#) of ALN is materially the same as that for SEN, whereby learners:

- have a significantly greater difficulty in learning than the majority of others of the same age (that cannot be addressed solely through differentiated teaching); or
- a disability (for the purposes of the Equality Act 2010) which prevents or hinders them accessing education or training that is generally provided for others of the same age; and
- the learning difficulty or disability calls for Additional Learning Provision (ALP).

The legislation states that a learning difficulty or disability may arise from a medical condition or otherwise. However, as set out in this briefing and in the Minister's letter, a medical condition does not automatically mean the child has ALN and the ALN system will only apply if the child requires ALP.

3.2. Information guides

The Welsh Government has produced a [series of information materials](#) on the ALN system, including guides for [parents](#) and [post-16 learners](#).

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that

schools

these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.



Eich cyf/Your ref: P-06-1341
Ein cyf/Our ref: JMEWL/00881/23

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
Government.Committee.Business@gov.wales

9 June 2023

Dear Jack

Thank you for your letter of 18 May regarding issues raised in a petition received by the Petitions Committee from Zoe Beasley.

The Welsh Government is fully committed to creating an inclusive education system and to helping ensure all pupils, including those with additional learning needs (ALN) and/or healthcare needs, can achieve their full potential.

As part of our reforms of the education system in Wales the current special educational needs (SEN) system is gradually being replaced by the ALN system which is underpinned by the ALN and Education Tribunal (Wales) Act and accompanying [ALN Code for Wales](#). Phased implementation of the new ALN system began in September 2021 and will continue until August 2025. Learners with SEN are moving to the new ALN system in groups.

The ALN Act and the ALN Code create a unified legislative framework which helps ensure each individual, has their views, wishes and feelings identified early and placed at the heart of the process to identify and meet their needs. This should help make the new system fairer and less adversarial. The new system also ensures that learners aged 0-25 who require additional support to meet an ALN have that support properly planned for and protected in a single statutory plan called an Individual Development Plan (IDP). We have also strengthened children's rights with clear routes to take if there are disputes. The ALN Code for Wales includes a chapter on preparing and maintaining IDPs.

As part of our work to implement the ALN system we have developed and delivered an extensive package of training, core skills development and ongoing professional development for all practitioners. This includes a specific professional learning offer for ALN Co-ordinators who provide a strategic leadership role and act as the first port of call for teachers looking for ALN advice and guidance. We have also produced guidance for parents and young people which includes [guidance on rights](#) under the new system.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Jeremy.Miles@llyw.cymru
Correspondence.Jeremy.Miles@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

Back Page 24
We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Under the ALN Act, a child has ALN if they have a learning difficulty or disability that calls for additional learning provision (ALP) (which is itself defined as provision that educates or trains). The ALN Act states that a learning difficulty or disability which amounts to ALN (because it called for ALP) could arise as a result of a medical condition, but this does not mean that medical conditions equate to ALN. The provisions of the ALN Act are only relevant to a child with a healthcare need such as diabetes, where that child's healthcare need gives rise to an ALN as defined by the ALN Act, or where they also have an ALN that is unconnected to their healthcare needs. Therefore, the provisions of the ALN Act are only relevant to a child with healthcare needs if those needs give rise to a learning difficulty or disability, or they otherwise have a learning difficulty or disability, that calls for ALP.

In 2017 the Welsh Government published '[Supporting Learners with Healthcare Needs](#)' guidance to assist governing bodies, education settings, education and health professionals and other organisations to support learners with healthcare needs and ensure minimal disruption to their education. Local authorities and school governing bodies must have regard to this statutory guidance when carrying out their duties under the Education Act 2002 in promoting the welfare of children who are learners at the education setting, including meeting their healthcare needs.

The Supporting Learners with Healthcare Needs document contains both statutory guidance and non-statutory advice. It includes a requirement for local authorities and education settings in Wales to create and maintain a healthcare needs policy which should seek to ensure that pupils with any medical condition, including diabetes, are properly supported. It includes advice on training and raising awareness of common conditions and emphasises the need for a collaborative approach from education and health professionals, placing the learner at the centre of decision making.

Some learners with healthcare needs will need an Individual Healthcare Plan (IHP). This is essential where healthcare needs are complex, fluctuating, long term or where there is a high risk that an emergency intervention will be needed. The Supporting Learners with Healthcare Needs guidance sets out the process for deciding if an IHP is needed and explains roles and responsibilities in the creation and management of IHPs.

Education settings have access to support from a health advice service which may include:

- offering advice on the development of IHPs;
- assisting in the identification of the training required for the education setting to successfully implement IHPs; and
- supporting staff to implement a learner's IHP through advice and liaison with other healthcare, social care and third sector professionals.

Health advice and support can also be provided by specialist health professionals such as GPs, paediatricians, speech and language therapists, occupational therapists, physiotherapists, dieticians and diabetes specialist nurses. Third sector voluntary bodies can also provide advice and practical support. Proactively engaging with specialist services can provide practical help when writing and implementing IHPs and they can also provide training and awareness-raising resources, including video links.

The Supporting Learners with Healthcare Needs guidance states that IHPs should be reviewed at least annually or more frequently should there be new evidence that the needs of the learner have changed. Where a learner with healthcare needs also has an ALN the IHP should be linked or attached to the learner's IDP. The ALN Code explains that where a learner with ALN has more than one plan that requires review, the preparation or review

could be undertaken simultaneously to facilitate a more holistic approach to the planning of care and support for the child or young person.

The Children and Young People Wales Diabetes Network has several projects ongoing as part of its work in education, including an all-Wales School Guideline to help schools improve staff confidence, understanding and safe management of Type 1 Diabetes in children and young people. The Network has developed staff training materials including: 'Introduction to Type 1 Diabetes in School'; 'Testing Blood Glucose Levels in School'; 'Carbohydrate Counting Practice for School Staff'; 'Introduction to Diabetes Technology for School Staff'; and 'Exercise and Exams'.

As regards funding, local authorities are responsible for ensuring suitable education provision for all learners in their area, including learners with healthcare needs, and should work with their schools to ensure their school funding arrangements are effective in supporting and raising the achievement of all children. Local Health Boards are responsible for planning and delivering NHS services in their areas, which includes the health advice service available to education settings.

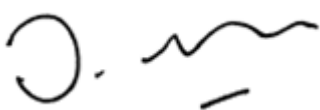
If parents/carers of learners with healthcare needs and/or ALN are not satisfied with the actions of the school after trying to resolve matters informally with them, they can consider making a formal complaint to the school. If they are not satisfied with the outcome at school level, they can approach the local authority to see if they are able to assist. If they remain dissatisfied following these discussions, they can make a complaint to the local authority. Complaints about NHS services can be made via ['Putting Things Right'](#).

Learners with ALN may also have a right to appeal to the Education Tribunal for Wales (ETW) which hears and decides parents' appeals against the decisions of local authorities regarding learners' ALN, where parents cannot reach agreement with the local authority. Children with diabetes, or their parents, can appeal to the ETW against a decision in relation to whether or not they have ALN, or in relation to the ALP with which they are provided. They do not, however, have right of appeal to the Tribunal solely because they have diabetes or because they are not given an IHP. The ETW also deals with claims of disability discrimination in school. Further information about the ETW is available on its [website](#).

Stakeholders played an essential part in the development of the Supporting Learners with Healthcare Needs guidance. Following further engagement with relevant stakeholder groups in 2018 we published three quick healthcare needs guides for teachers and support staff, parents, and young people. These [guides](#) are available on our website.

As part of our work to update a wide range of guidance following implementation of the ALN Act, we will be ensuring the Supporting Learners with Healthcare Needs guidance appropriately uses the terminology used by the ALN Act. We will also continue to keep it under review in light of any new information that may emerge that could impact on this policy area.

Yours sincerely,



Jeremy Miles AS/MS

Gweinidog y Gymraeg ac Addysg
Minister for Education and Welsh Language

Zoe Beasley
Cardiff

31st of August 2023

Chair of the Petitions Committee

Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

CC Diabetes UK Cymru,
Wales@diabetes.org.uk

Dear Mr Jack Sergeant.

I am writing to you regarding the ALN Act and the negative impact the current implementation is having on [REDACTED] and other families with children living with long-term health conditions like diabetes.

My son [REDACTED] was diagnosed at one and a half years of age; he was in DKA (diabetic coma). His Doctor was found to have been negligent in his duties and understanding of type 1 diabetes; during a medical examination before he went into DKA, his exact words were, "Kids don't get diabetes," and he refused to do a dip test.

This isn't the only challenge/difficult time my son has faced since being diagnosed with this lifelong condition, we have been struggling to gain adequate care since his school placement at the age of five to a school in Newport. I was told on the first induction day that it would be fine to accept him; after his first day, I was told not to bring my son back for the second induction day. I asked the school why this was, and their response was that he has type 1 diabetes and wouldn't be able to participate in cooking and other activities. As you can imagine, I was very upset by this, but that did not change their outcome.

During Covid, we started looking into other schools, and I settled on a Primary school in Cardiff. We sold our house in Newport and started making preparations for the move. The house in Cardiff had to be near the school as he couldn't walk long distances. With the new school placement, we thought things were looking up for [REDACTED] as they arranged training for the staff and had a care plan in place. Unfortunately, the plan wasn't being followed, and my son's blood glucose levels were left to drop to dangerous levels (1.9), when I enquired I was told he hadn't been given his hypo treatment. Unfortunately, this was a consistent pattern, where there were continuous errors in his care to the point where I considered homeschooling; however, although in [REDACTED]'s medical best interest, this would impact his education and lifelong learning as he would miss interacting with friends, classmates and teachers.

We shouldn't have to consider this because of his lifelong condition.

Frustrated, I started a petition highlighting the lack of support for my son and other children like him and the challenges they were going through. It wasn't until I sought out help from outside sources (Diabetes UK) that I was given support. Like many families, we have no way of knowing how to get the help and support needed to tackle/help the situation we face. With the ALN Act's slow

implementation, schools still fail to give basic care. In my son's school, the current ALNCO who is in charge of the care of the children with medical/additional needs, has had long periods of absenteeism with no remedy to support the children's needs. One of the ongoing issues is the need to train a teacher to help manage [REDACTED]'s Type 1 diabetes (pump training), which his diabetes team still hasn't been contacted to arrange. This is after twice verbally informing the school that they have tried contacting the ALNCO and need to arrange it before term begins.

My son isn't the only one. Another child who is losing their eyesight is also facing difficulties, which should have been supported three weeks ago and is still (at the time of writing this letter) waiting for support. The child and their family are also facing similar problems that we are facing with [REDACTED], with parents kept in the dark waiting for the school to get its act together.

This is also not an isolated incident in [REDACTED]'s school. Several other parents from different schools across Wales have been in touch, sharing similar problems we have faced. We are all finding it difficult to support our children and gain the funding the ALN Act has in place to support them in school. It is frustrating, especially when we have been fighting for basic care for years. It is unfair for our children, as they face concerns and troubles managing their long-term health condition whilst also learning in an environment that is challenging to any child.

My son is losing the TA (teaching assistant), who has been his main caregiver for the last two years. The school's assessment found that [REDACTED] requires additional support; unfortunately, the school has informed me that they cannot grant 1:1 care due to funding constraints. His care for next year has not been planned out. Working with his diabetic team, I have been chasing for an update on his care to no avail. When writing this letter, we had no update days before [REDACTED] is due back on the 6th of September. Current staff shortages mean that the school cannot adequately provide and assess support for children like [REDACTED]. This is not fair and needs to change.

Type 1 diabetes is a serious condition; my son's, H1ba1c levels are inconsistent, which are influenced by everything from exercise to the weather, which impacts him on a daily basis, missing out on a lot of activities such as playtimes, school plays/practices and more importantly time in the classroom.

He has a low immune system and picks up illnesses easily, which has a knock-on effect with his ketones as his body finds it harder to fight things off; this is the same for all kids like [REDACTED] with additional health issues. What frustrates me more is that these concerns are stated in his school report, that his health condition is affecting his ability to learn, something I thought that the ALN Act provisioned for. Sadly, I am informed that there is nothing I can do about my son's diagnosis but what can be changed is the support system in place for kids like [REDACTED], who clearly need extra support in school.

I and other parents like me need to be informed of how we can access the care and provision that the ALN Act is meant to provide for and, failing a provision by the Act, continued support under the Equality Act 2010. Which [REDACTED]'s school and other institutions like it are failing to meet.

Thank you for taking the time to review my petition; I hope we can develop positive changes that can help my son and other children living with long-term health conditions like diabetes.

Kind regards,

On behalf of Toby, his mum,

Zoe Beasley.

P-06-1353 Devolve responsibilities and budgets for trunk roads in North Wales to North Wales.

Y Pwyllgor Deisebau | 25 Medi 2023
Petitions Committee | 25 September 2023

Reference: SR23/6132-5

Petition Number: P-06-1353

Petition title: P-06-1353 Devolve responsibilities and budgets for trunk roads in North Wales to North Wales.

Text of petition: At the moment all the roads, except large trunk roads, come under the responsibility of the six local authorities in North Wales. Including the trunk road networks within the responsibility of the six local authorities in North Wales will lead to much more relevant and pragmatic decisions, as local authorities are far more in tune with local businesses, communities, and the economy.

North Wales has some of the largest industrial parks (such as Wrexham and Deeside) in the UK. There are many internationally known companies that have made North Wales their home. It has one of the biggest manufacturing jobs concentrations in the UK. Holyhead, two international airports (Liverpool & Manchester) make it easy to promote North Wales as a great place for investment. Unfortunately, its road network is outdated and is therefore preventing the region from achieving its potential for economic growth. These roads including the trunk roads must be planned and designed together in consultation with the local communities and businesses to achieve the best return on investment. This will address local needs such as easy access to employment. Only a locally based decision will address North Wales' road transport needs. The voice of local businesses and communities needs to be heard.



1. Background

The Welsh Government is the highway authority for the trunk road and motorway network, known together as the Strategic Road Network (SRN). Each local authority is the highway authority for the local road network in its area.

The Welsh SRN is managed by two trunk road agents – the [South Wales Trunk Road Agent](#) (SWTRA) and the [North and Mid Wales Trunk Road Agent](#) (NMWTRA). Together, these are responsible for network and asset management, capital maintenance and routine maintenance. Major projects on the SRN are managed centrally by the Welsh Government. Transport for Wales also has a role in integrating the planning and development of the SRN in its overall sustainable transport programmes.

The Senedd passed the [Local Government and Elections \(Wales\) Act 2021](#) in November 2021. The Act established Corporate Joint Committees (CJCs) as regional corporate bodies to deliver certain local authority functions on a regional basis. This includes preparation of Regional Transport Plans (RTPs), with further functions likely to pass to CJCs in future. Senedd Research’s [2022 article on CJCs](#) includes further background.

The roads review

The Welsh Government published the [final report of the its Roads Review Panel](#) in February 2023, along with the [its response](#) and a new [National Transport Delivery Plan](#) (NTDP).

The Welsh Government’s new policy limits highways investment to four purposes: support for modal shift; casualty reduction; climate change adaptation; and sustainable access to development sites. It also sets four conditions for investment, for example that carbon emissions from construction should be minimised.

Of 16 north Wales schemes reviewed, [15 were stopped or sent back for review](#). Some plans set out in the new NTDP differ from the panel’s recommendations. For example, a recommendation that the third Menai Crossing shouldn’t proceed was changed to a referral to the [North Wales Transport Commission](#) to develop options for resilience on the Menai strait. Also, while the [Flintshire Corridor Improvement programme has been cancelled](#), the NTDP commits to develop options to improve air quality at the A494 Aston Hill.

Senedd Research has published an article providing further details on the review and the Welsh Government response.

Following publication of the review Ken Skates MS – formerly Minister responsible for transport in the Fifth Senedd – called for transport responsibilities to be devolved to CJsCs.

On 13 June a media report suggested two economic projects - the Western Gateway project in Wrexham and Warren Hall at Broughton – are at risk following the roads review.

In July, the Welsh Government’s Deputy Director for Transport Strategy and Policy told the Committee for the Scrutiny of the First Minister that Warren Hall is included in a review of economic development and transport schemes established following the publication of the roads review report. He also said discussions are underway with Wrexham Council on the Wrexham Gateway project.

2. Welsh Government response

The letter from the Deputy Minister for Climate Change, Lee Waters, to the Chair responding to this petition says there are no plans to review management of the Welsh SRN. He explains why, in his view, it would not be desirable to devolve responsibility, highlighting that the SRN has a different role to local roads so that devolution would lead to a “disjointed view on the way the national system of routes operates across Wales” as well as inefficiencies and cost increases. He says:

There are benefits with this model of the SRN being managed by the Welsh Government when it comes to prioritisation of projects which help support the environment, economy and for those living and working in Wales.

He goes on to explain the links between, and coordination of, the NTDP and the RTPs currently being developed by CJsCs. He refers to the fact that the final report of the North Wales Transport Commission is expected later this year.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Lee Waters AS/MS
Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1353
Ein cyf/Our ref LW/01412/23

Jack Sargeant MS
Chair - Petitions committee

31 August 2023

Dear Jack,

Thank you for your letter of 11 July enclosing P-06-1353 – Devolve responsibilities and budgets for trunk roads in North Wales to North Wales Local Authorities from Askar Sheibani.

Since devolution in 1999, Welsh Ministers have had responsibility for the strategic road network (SRN) in Wales and in law, are the highway authority. The strategic nature of this asset is not localised and must reflect the requirements of the whole of Wales and ensure Welsh Government policy, such as the [Wales Transport Strategy](#) (WTS) is applied to every aspect of its management.

These roads formed what the Trunk Roads Act of 1946 called "the national system of routes for through traffic". The trunk road therefore takes a different role within local authority areas compared to the local road network i.e. the trunk road generally caters for high volumes of through traffic with the local roads distributing the local traffic to local businesses, communities and supporting the local economy. When a trunk road has been improved by a motorway, bypass or a similar route, it may be de-trunked. This is generally de-trunked to the local authority to manage with much less traffic on that route with the improvement made and seldom becomes more of a distributor road.

To switch the responsibility of trunk roads to the local authority would not be an easy task especially with the various legislation and powers in place for Welsh Government. Furthermore, it would lead to a disjointed view on the way the national system of routes operates across Wales. This was identified when the trunk road network was originally managed by local authorities on behalf of the Welsh Government many years ago. It led to inefficiencies and cost increases with the high number of resources required to operate and maintain the trunk roads each year. This resource no longer exists in local authorities to manage the various assets effectively. That is why over the years, we have reviewed the

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Lee.Waters@llyw.cymru
Correspondence.Lee.Waters@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

management of the SRN via our agents and reduced these to two agents that work for the Welsh Government today, the North and Mid Wales Trunk Road Agent and South Wales Trunk Road Agent.

This management arrangement is the same as other parts of the UK where devolved administrations manage the trunk roads in Scotland and Northern Ireland. The exception being National Highways managing the trunk road network in England

There are benefits with this model of the SRN being managed by Welsh Government when it comes to prioritisation of projects which help support the environment, economy and for those living and working in Wales.

In addition, the Local Government and Elections (Wales) Act 2021 (“the LGE Act”) created a framework for a consistent mechanism for regional collaboration between local government, namely Corporate Joint Committees (CJCs). The Act provides for the establishment of CJCs through Regulations. The emerging Regional Transport Plans (RTPs) are currently under development by the various CJCs following the publication of our [Regional Transport Plans: Guidance for Corporate Joint Committees](#). The RTPs and accompanying Regional Transport Delivery Plans (RTDPs) will set out the policies, programmes and projects to deliver the WTS in the region over a five-year period from 2025-2030.

In accordance with this guidance, they must align with the [National Transport Delivery Plan](#) which sets out Welsh Government’s policies, programmes, projects to deliver the WTS vision, ambitions and priorities across Wales over a five-year period. This includes SRN projects. Given the overlapping publication cycles, it is expected that RTPs will inform subsequent versions of the NTDP. The current NTDP is due to be revised in 2027 and will include involvement and consultation from all stakeholders.


Furthermore, the planning and design of schemes always involves consultation with the local communities and businesses. The Future Generations Act requires us to do this, and the Welsh Transport Appraisal Guidance (WelTAG) is our mechanism.

Prioritisation of funding is also a fair and equal process spread as far as possible and equally across Wales. Ensuring the Welsh SRN is updated to meet statutory and policy objectives is a focal point of the WTS, and Welsh Government continues to promote schemes in the NTDP that align with legislation and policy.

Considering the development of the RTPs and CJCs there are currently no plans to review the management of the trunk road/strategic road network for Wales.

We have asked the North Wales Transport Commission to advise and recommend solutions for a better transport system in north Wales. They published their [interim report](#) in June [North Wales Transport Commission: Interim Report June 2023 | GOV.WALES](#). I look forward to receiving the Commission’s final report and recommendations later this year and following this, I will set out the Welsh Government’s response.

Yours sincerely,



Lee Waters AS/MS

Y Dirprwy Weinidog Newid Hinsawdd
Deputy Minister for Climate Change

P-06-1353 Devolve responsibilities and budgets for trunk roads in North Wales to North Wales - Correspondence from the Petitioner to the Committee, 20 September 2023

North Wales' economy is fundamentally different from South Wales. We have a historic relationship with Liverpool and the neighbouring regions. North Wales has excellent connections to the international market through two international airports (Liverpool and Manchester) and access to a good motorway network connecting it to the rest of the UK market. Sadly the trunk road networks in North Wales have not been developed to cater for economic growth. There are no motorways in North Wales. This is the very reason that the vast majority of our highly successful industries have decided to set up their operations in North East Wales right at the English border, so they can have access to more up-to-date and suitable road networks. I believe the population of North Wales, its six local authorities and the business community have a much better understanding of the type of Trunk Roads which would deliver a more efficient transport network relevant to North Wales' economy and social needs.

A devolved power to North Wales, with an appropriate budget to maintain and develop its own road network, will reduce costs, and help to support the creation of a prosperous economy and employment. We are very fortunate in North Wales in having Anglesey as a freeport. The freeport has the potential to transform North Wales's trade and tourism. Unfortunately, the present road network will stifle this opportunity too. The present policy of making the decisions for North Wales road development centrally without consulting the stakeholders and the citizens has not worked so far. It's high time to change course and devolve this responsibility to North Wales.

1. Has the Deputy Minister discussed devolving responsibilities and budgets for North Wales Trunk Roads with regional leaders?
2. Has the Deputy Minister told the North Wales Transport Commission that he will reject such a recommendation, should the Commission make it?
3. Is spending on the Strategic Road Network available by region, in the interests of transparency?
4. In principle, does the Welsh Government support the notion that people in North Wales should determine investments in all roads in North Wales?
5. Has the Welsh Government ruled out devolving responsibilities for trunk road investment to the Corporate Joint Committee?
6. Would the Welsh Government agree to at least consult with the people of North Wales over the devolution of responsibilities for trunk roads?

Kind regards,

Draw up a new Microplastics Action Plan for Wales

Y Pwyllgor Deisebau | 25 Medi 2023
Petitions Committee | 25 September 2023

Reference: SR23/6779-1

Petition Number: P-06-1357

Petition title: Draw up a new microplastic action plan for Wales

Text of petition: Microplastic particles have been found from the highest mountain tops to the deepest oceans and plastic microfibres from the clothes we wear are estimated to make up about 35% of the entire plastic pollution in our seas and oceans. Microplastics have been found to be toxic to marine life and growing evidence suggests they are harmful to life on land, including ourselves.

We call on Welsh Government to draw up a new Microplastics Action Plan to protect life in our seas and on our land.

Microplastics are thinner than a human hair but they are causing big problems for life in our oceans and on our land. They come from many sources including plastic bottles, vehicle tyres and even from paints on buildings and road markings.

They are also in the air and in our food chain. Fragments have even been found in the blood in 8 out of 10 people with as yet unknown health effects.

Welsh Government has a strong record of action on plastics but there is scope for increased action on microplastics.



We ask that Welsh Government work with relevant organisations and experts to draw up a Microplastics Action Plan to include things like addressing plastic microfibre release and microplastic pollution on land and in water courses around Wales and the provision of education about these issues in schools.

Microplastic pollution is a big problem in Wales - we must address it.

1. Background

Microplastics are plastic particles which are just a few millimetres in size, less than 5mm in any dimension. They can be categorised into two main types: primary and secondary

1.1.a. Primary Microplastics

These are microplastics that have been manufactured to be microplastics e.g. microbeads, as well as microfibers shed from clothing and other textiles, such as fishing nets.

A 2016 report by environmental consultants Eunomia, 'plastics in the marine environment', shows that tyre wear and pellet spills are the most prevalent source of primary microplastics. Plastic pellets, otherwise known as pre-production pellets or 'nurdles', are microplastics used in the production of plastic products.

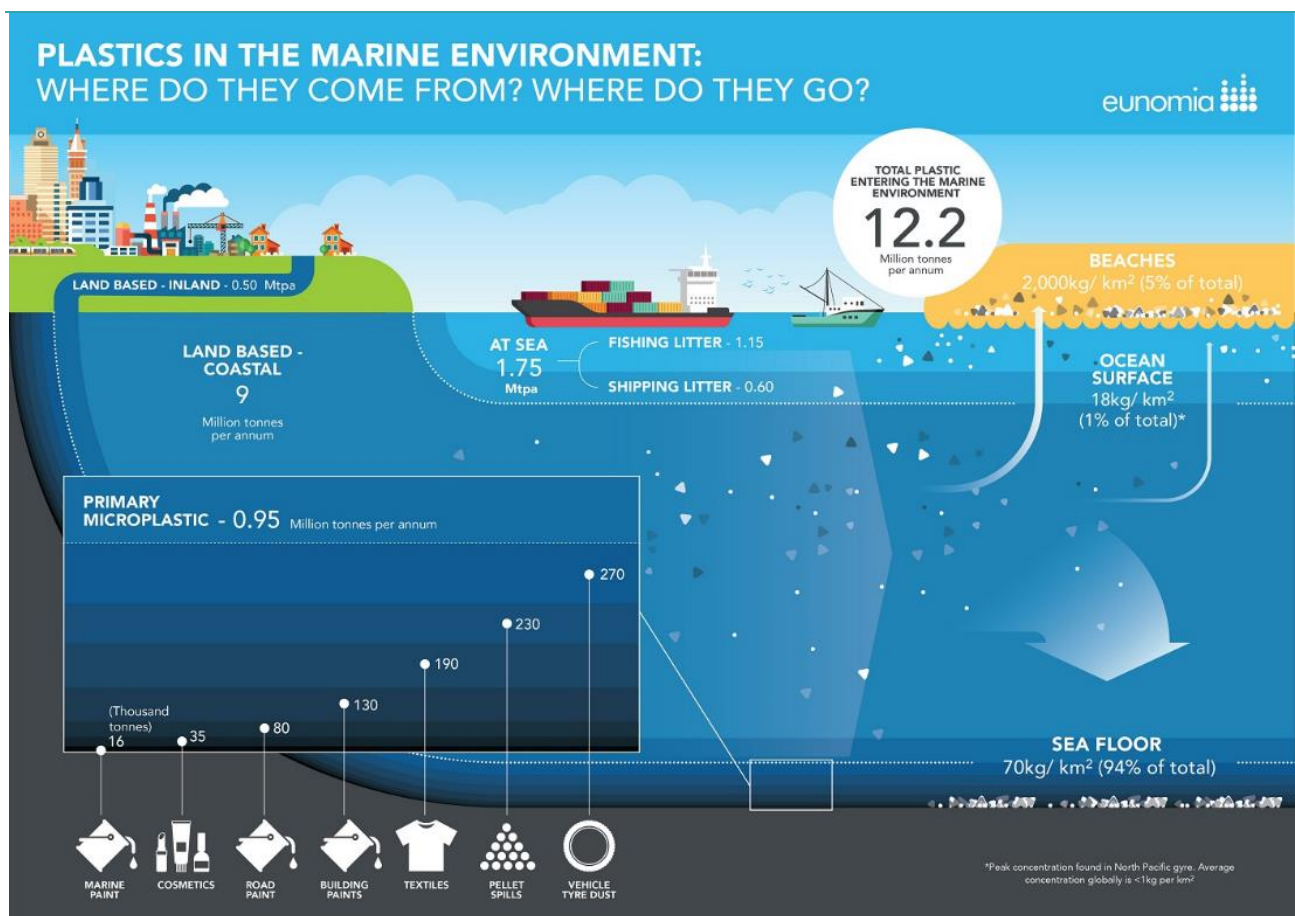


Figure 1. Plastics in the marine environment. [Source: [Eunomia](#)]

1.1.b. Secondary Microplastics

Secondary microplastics are created by the breakdown of larger pieces of plastic by external factors such as UV radiation, wind, waves, animals etc. As **80% of plastic pollution** entering the marine environment is understood to be from land-based sources, macroplastics (larger plastic items) are a key source of microplastic pollution.

A 2017 report by OSPAR, [assessment documents of land-based inputs of microplastics in the marine environment](#), shows that land-based litter is the cause of some of the highest emissions of microplastics in OSPAR countries, second only to tyre wear.

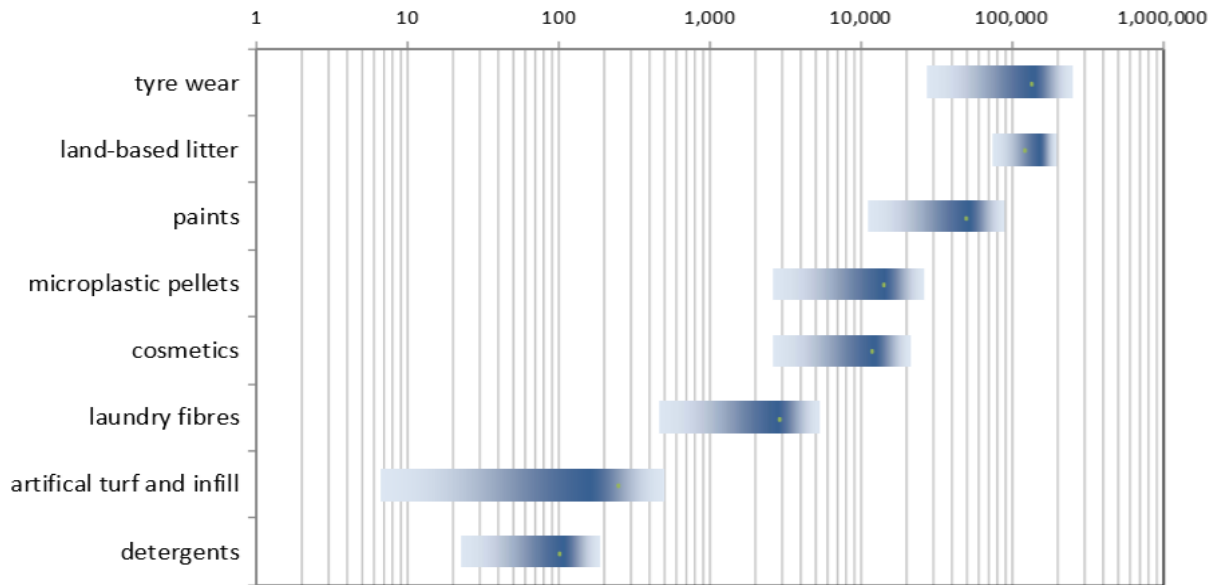


Figure 2. Estimated emissions of microplastics in OSPAR catchments (tonnes/year).
[source: [Ospar](#)]

Note: The bars represent the uncertainty margins of the emission, white dots represent the midpoint.

1.2. Impact of microplastics

Research has shown that ingestion of microplastics can have a negative effect on marine life. In addition, microplastics are able to absorb and concentrate pollutants from the surrounding environment (bioaccumulation), facilitating chemical pollutants entering the food chain.

Microplastics are known to be ingested by organisms throughout the food chain, and have been found in fish being sold for human consumption, as well as in bottled drinking water. Microplastics are also known to be inhaled or swallowed, and have been found in human blood. However, possible adverse effects of plastics on humans is hard to measure, and the extent to which they cause 'harm' is unknown.

2. Welsh Government action

The Welsh Government has introduced a number of measures to curb plastic pollution, including:

- introducing a charge on single-use carrier bags;
- banning microbeads in wash-off personal care products; and
- banning commonly littered single-use plastic products (due to come into force from October 2023).

The Environmental Protection (Single-use Plastic Products) (Wales) Act 2023 allows the Welsh Ministers to add items to the list of banned commonly littered single-use plastic products. In her response to this petition, the Minister for Climate Change, Julie James MS, confirmed that the Welsh Government is:

... already prioritising evidence gathering for other problematic products that contribute to microplastic pollution such as wet wipes.

When flushed, wet wipes not only cause blockages, but also release plastic microfibers into the environment. The Minister told the Climate Change, Environment and Infrastructure Committee (September 2022) that the “big issue with wet wipes” is labelling, which isn’t devolved to Wales. However the UK Government’s recent Plan for Water includes a commitment to consult on banning the use of plastic in wet wipes. In her response to this petition, the Minister said:

We are currently working with the UK Government and Devolved Governments on potential regulatory action in this area.

The Minister also highlighted Welsh Government work on introducing Extended Producer Responsibility (EPR) and a Deposit Return Scheme (DRS).

Proposals for a UK-wide EPR scheme were jointly consulted on (by all four UK nations), and focused on moving the cost of dealing with packaging waste away from households, local taxpayers and councils, and onto the packaging producers. This is in line with the ‘polluter pays’ principle, where those who make pollution-causing products, pay the full costs when they become waste. The proposed EPR will:

... provide a financial incentive for producers to reduce the amount of packaging they place on the market and to improve the recyclability of packaging.

EPR was due to be implemented in a phased manner from 2024 (originally 2023), however this has recently been further delayed to October 2025.

Under a DRS, consumers are charged a sum of money as a deposit upfront when they buy, for example, a drink in a single-use container. This can be redeemed when the empty container is returned, increasing the number of containers captured for recycling.

DRS proposals were jointly consulted on (by the Welsh Government, the UK Government for England and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland) for a second time in 2021. The governments jointly responded in January 2023, and proposed a commencement date of 1 October 2025, however this is a “stretching target date”.

In the response to this petition, the Minister said:

We have also worked across governments to develop a British Standard to prevent the loss of plastic pellets to the environment during transport and production phases of plastic. We have collaborated on the development of a microplastics indicator for our seas.

3. Welsh Parliament action

The Fifth Senedd’s Climate Change, Environment and Rural Affairs committee undertook an inquiry into reducing plastic waste, where it looked at the sources and impact of microplastic pollution.

In January 2021, Huw Irranca-Davies MS asked the then Minister for Environment, Energy and Rural Affairs, Lesley Griffiths MS, for a statement on the Welsh Government's plans to tackle microplastic pollution in Wales. The then Minister highlighted that the Welsh Government was working with a number of organisations, including the UK Centre for Ecology and Hydrology (UKCEH) and UK Water Industry Research (UKWIR), on understanding microplastic pollution further.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1357
Ein cyf/Our ref JJ/02347/23

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

12 September 2023

Dear Jack,

Thank you for your letter of 15 August regarding a petition from Friends of the Earth calling on a Microplastics Action Plan for Wales.

I share Friends of the Earth Cymru's concerns over microplastics. I believe it is imperative that societal use of plastics, especially single-use plastic, is reduced to protect the environment, biodiversity and human health.

Microplastics originate from a range of different sources, including industrial and domestic activities. Consequently, we have several existing strategies which are committed to taking a focussed and evidence-based approach to tackling microplastics. However, I acknowledge this is a complex and evolving area of science where we continue to undertake research in this area and where appropriate take mitigating action.

The Welsh Government has a long history of action to reduce the flow of plastic into the environment. I am proud of the legislation we have introduced to address the problem. This includes charges on single-use carrier bags, banning microbeads in wash-off personal care products and most recently, the bans on commonly littered single-use plastic products which will shortly come into force under The Environmental Protection (Single-use Plastic Products) (Wales) Act 2023.

The Act provides Welsh Ministers with powers to introduce further bans if needed. I can confirm we are already prioritising evidence gathering for other problematic products that contribute to microplastic pollution such as wet wipes. When used wipes are flushed, they can block drains, contribute to flooding and add microplastic fibres to our water supply. By stopping the supply of unnecessary plastics at the source, we will slow down the leakage of microplastics into our environment. We are currently working with the UK Government and Devolved Governments on potential regulatory action in this area.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Julie.James@llyw.cymru
Correspondence.Julie.James@gov.Wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

We are also working to introduce an Extended Producer Responsibility scheme for packaging, which will introduce a sliding scale of fees for producers who place packaging on the market. This will help reduce the volume of packaging and make it easier to recycle. We are also working on a Deposit Return Scheme for drinks containers. Both initiatives also aim to reduce the littering of packaging, including packaging made of plastic.

We have an extensive household waste collection system where as much as possible is recycled and are extending similar requirements to businesses during 2024.

We have also worked across governments to develop a British Standard to prevent the loss of plastic pellets to the environment during transport and production phases of plastic. We have collaborated on the development of a microplastics indicator for our seas.

I believe the range of actions we are taking, and our existing strategies illustrate the Welsh Government is committed to taking a focussed and evidence-based approach to the plastic and microplastic problem.

Yours sincerely,



Julie James AS/MS
Y Gweinidog Newid Hinsawdd
Minister for Climate Change

P-06-1357 Draw up a new Microplastics Action Plan for Wales, Correspondence – Petitioner to Committee, 19.09.23

Dear Jack Sargeant MS and the Senedd Petitions Committee,

Many thanks for considering our petition 'Draw up a new Microplastics Action Plan for Wales'.

We would like to add the following information for your consideration.

We (Sustainable Clothing and Textiles Cymru) are a coalition (members include Sustainable Fashion Wales, Friends of the Earth Cymru, Repair Café Wales, the Eco-schools programme Keep Wales Tidy and Welsh sustainable fashion label Onesta, amongst others), brought together to look into all the various aspects of sustainable fashion in Wales and to highlight the issues and recommend solutions. We have produced a [document highlighting all these various recommendations](#) and presented it to Welsh Government at the start of this year.

One of the issues that we highlight in our recommendations report is the one on plastic microfibres being released from synthetic clothes when they are washed. This is an issue that has been raised before by the National Federation of Women's Institutes in their excellent '[End Plastic Soup](#)' report.

Obviously these plastic microfibres are then part of a wider issue of microplastic pollution and one we believe should be addressed in more detail here in Wales.

Our recommendation, specifically, is that Welsh Government facilitate the bringing together of an expert group in Wales who can then help draw up a new **Microplastics Action Plan for Wales**. We already have many experts on the issues in Wales, from prominent academics to organisations like Dŵr Cymru and NRW, National Federation Women's Institutes Wales, NGO's and other individuals.

We believe this approach, to facilitate the bringing together of an expert group would ensure all the different sources of microplastic pollution are discussed and investigated and that all relevant solutions are included in a new Action Plan.

We hope that the Senedd Petitions Committee will support this recommendation.

Further information

Microplastics are particles of plastic below 5mm in size (thinner than a human hair) and come from a variety of different sources.

Worldwide, around 70 million barrels of oil a year are used to make polyester fibres in our clothes. Washing some clothes, meanwhile, releases about 500,000 tons of microfibres into our oceans each year (the equivalent of roughly 50 billion plastic bottles!).

Astonishingly, plastic microfibres washed off from synthetic clothes are estimated to make up about 35% of the entire plastic pollution in our seas and oceans. The majority of these microfibres are released the first few times a piece of clothing is washed.

Washing machines and wastewater treatment plants aren't designed to trap the minute plastic fibres that our clothes shed during washing. Many of these fibres sneak into our waterways and ultimately the oceans. And lots are caught up in sludge at the treatment plants – which is then sprayed over our soils as fertiliser.

Microplastics are now ubiquitous in the environment and evidence already exists of their presence in the food chain and the adverse effects on animals. Microplastic fragments have also now been found in the blood in 8 out of 10 people with as yet unknown health effects.

Open Letter

In July 2023 we organised an [Open Letter](#) to Welsh Government signed by over 50 organisations including Dŵr Cymru, WWF Cymru, NFWI Wales, Cynnal Cymru, CPRW, Eryri National Park, National Trust and Wildlife Trusts Wales.

Our ask was simply that Welsh Government now convene an expert group to come together to look at the issues of microplastics in Wales, all their various sources, and to then recommend a suite of solutions.

Welsh Government response to the Senedd Petitions Committee

We note Welsh Government's response both to your communication with Minister for Climate Change Julie James MS and also in similar correspondence we have received from her following the publication of the Open Letter. We agree that Welsh Government are doing some very good things on waste and plastics issues that will help reduce the amount of microplastics entering our environment but there are also a great many other things that need to be done that Welsh Government isn't doing which an expert group is best placed to advise on.

Bringing together an expert group

We feel this way of going about things is the correct one in this instance as we realise that the Senedd's legislative calendar is already very full and that there is also a certain lack of capacity within the relevant governmental departments.

Precedent

Welsh Government have brought together groups such as this before, one recent example being to look at phosphorous pollution in Welsh rivers (<https://www.gov.wales/first-minister-hosts-summit-solutions-river-pollution>).

Another interesting and relevant group is the Wales Clean Seas Partnership whose remit has been to help draw up a Marine Litter Action Plan for Wales.

(<https://businesswales.gov.wales/marineandfisheries/information-and-statistics/wales-clean-seas-partnership>)

As the sources of microplastics are wide ranging and are both terrestrial and marine, we feel a new expert group is desperately needed to deal with both the sources and solutions to the problems.

There are many academics, experts and organisations in Wales who are already working on the issue of microplastics and they are willing to support any new expert group so we feel our request to Welsh Government is both proportional and also timely and relevant.

Issues not covered by the Minister's response that we feel are important to consider:

Microplastic pollution of farmland

To highlight why we feel we need a new Microplastics Action Plan here in Wales, [Cardiff University scientists](#) have found quite staggering amounts of microplastics present in sewage sludge that is then spread on farmers' fields.

They conclude that 'Farmlands across Europe are potentially the biggest global reservoir of microplastics due to the high concentrations found in fertilisers derived from sewage sludge'.
shown.

They estimate that *'between 31,000 and 42,000 tonnes of microplastics (or 86 – 710 trillion microplastic particles) are applied to European soils annually, mirroring the concentration of microplastics found in ocean surface waters.'*

'In a study published in the journal [Environmental Pollution](#), the team estimate that microplastics removed from raw sewage at wastewater treatment plants go on to make up roughly 1% of the weight of sewage sludge, which is commonly used as a fertiliser on farms across Europe.'

The UK was shown to potentially have the highest amount of microplastic contamination in its soils, with 500 – 1000 microplastic particles per square meter of agricultural land applied per year, followed by Spain, Portugal and Germany.'

Lack of testing for microplastics in Wales

Bearing in mind the above study, as a coalition we have over the last few months submitted Freedom of Information requests to find out if any testing is currently being done for microplastics in watercourses in Wales. The responses we received showed that no testing was currently being done. This is not in any way a criticism of the organisations involved, merely an example of the changes we are seeking. We surely need to know the scale of the problem so we can help devise a comprehensive Action Plan to deal with it all.

We know that Dŵr Cymru for instance are very concerned about wet wipes continually being flushed into the sewer system. As well as the issues of blockages and 'fat bergs', these wipes, if plastic based, will shed microplastic particles. Therefore, future action on wet wipes might be an area for an expert group to make recommendations.

Washing machines

We know that synthetic clothes shed an incredible amount of plastic microfibrils when washed, especially during the first few washes. This issue in itself highlights the many cross overs between issues and is one of the main reasons we as a coalition are now looking at the issue of microplastics in general and not just clothing plastic microfibrils.

Indeed, France have just enacted legislation that by 2025 every new washing machine must have a filter to catch plastic microfibrils that come away from clothing during washing.

<https://www.oceancleanwash.org/2020/02/france-is-leading-the-fight-against-plastic-microfibers/>

Whilst action such as this would not be in the legislative competence of the Welsh Senedd, actions such as this are desperately needed and one action that might be recommended by an expert group would be that the Welsh Government work with the other UK administrations to enact similar legislation in the UK.

Education sector

It isn't just the obvious examples of solutions either that will need to be considered.

For instance, we also lobbied Welsh Government to introduce school uniform swap shops in all schools in Wales. Happily, they agreed to roll that out but even in education, there remains a lot more that could be done from more education around the issues of sustainable fashion to ensuring students can adequately mend their own clothes which would help cut down on the throwaway culture we find ourselves in. The less clothes we throw away, the less we need to buy, which in turn helps reduce both microplastics pollution if these clothes are synthetic but also then reduces climate

emissions and a whole host of other environmental problems such as other sources of pollution and land and water use.

Community enterprises

Allied to the above example, we feel that there is the possibility of rolling out the very successful [‘Play it Again Sport’](#) scheme in RCT to other parts of Wales. Play it Again Sport rescues sports kits and equipment from landfill and then sells them back to the community at heavily reduced prices. This helps to knock down the financial barriers stopping people participating in sport and improves physical health and mental wellbeing.

Again, this is a different sort of solution but one that also reduces microplastic release from clothes but also then has a wide variety of other social and community benefits but that isn’t covered by current Welsh Government plans and strategies.

Community actions such as this fall in the remit of Welsh Government and their inclusion in a wide ranging and overarching Action Plan would really position us in Wales as being forward thinking and willing to join up different aspects and sectors.

Business support and alternative materials

Again, these areas may not at first glance seem to be linked to microplastic pollution but increased business support for small sustainable fashion businesses in Wales could help Wales achieve an ambition of becoming a sustainable fashion hub with all the benefits that would have for our economy and for jobs in local communities.

The use of alternative materials such as wool and possibly even hemp are also potentially part of the solution here in Wales, especially immediately with wool. The wool industry in Wales is really struggling but wool is obviously a sustainable material and a joined-up approach between wool producers and sustainable fashion producers in Wales could help be part of the wider solution.

Similarly, an initiative with farming unions and businesses in Wales to investigate the benefits of hemp farming to the rural economy could also reap many long-term benefits given the nature of hemp as a bit of a wonder crop with it’s vast carbon sequestration potential as well as the ability to grow in virtually any soil, even heavily degraded soil, without the need for fertilisers and pesticides. A huge variety of products can be made from hemp including textiles and even bio plastics.

Other sources of plastic

Whilst we very much welcome the good work done by Welsh Government in moving to a circular economy, on banning certain single use plastics and pushing ahead with the Deposit Return Scheme, there are however still many other sources of plastic pollution that need to be addressed. Some of these larger plastic items themselves break down into smaller and smaller pieces of plastic over the course of time ending up as microplastics. Examples in the marine environment include marine coatings, plastic fishing nets and larger plastic items such as bottles and bags. Other surprising source are car tyres and paints on buildings and roads.

Conclusion

We feel an expert group of academics and organisations in Wales, working with Welsh Government would be able to help identify all the various sources of microplastic pollution and help propose solutions via a new **Microplastic Action Plan for Wales**. We hope you agree.

P-06-1358: Review the inadequate funding for schools in Wales

Y Pwyllgor Deisebau | 25 Medi 2023
Petitions Committee | 25 September 2023

Reference: SR23/6779-2

Petition Number: P-06-1358

Petition title: Review the inadequate funding for schools in Wales

Petition text: Many schools have set deficit budgets for 2023-24 financial year. More, perhaps most schools will be posting deficit budgets for 2024-25. The impacts on children in Welsh Schools are grave – poorer teaching and learning, poorer buildings, safety concerns and staff burnout.

More details: This petition was prepared by Chairs of Governor Associations throughout Wales.

The impacts of low funding on children in Welsh Schools are:

- Reduction in the quality of learning & teaching
- Increased adult/learner ratios
- Health & safety -less adult supervision, for example at lunchtime and breaks
- Fewer support staff, meaning that children with Additional Learning Needs are at risk of not receiving the help they need.
- Fewer adults in classrooms putting everyone at risk.
- Fewer teachers – either through non-replacement or redundancies.
- Less maintenance on buildings leading to safety concerns
- Increased stress on Headteachers and Senior staff, leading to increased sickness absence and burn-out.



And at the same time schools are struggling to implement educational reforms.

We urge the Welsh Government to urgently review the level of funding for Education for this and next financial years. Our children deserve the best education and must not suffer through funding cuts.

1. Summary

- Schools receive their budgets from local authorities, who use the funding, which they themselves receive from the Welsh Government through the local government settlement, to provide the range of services for which they are responsible.
- Funding from local authorities makes up the vast majority of funding that schools get, although the Welsh Government provides some direct funding to schools (via Regional Education Consortia) from its education budget for school improvement and targeted funding for the education of disadvantaged pupils.
- The money Local Authorities have planned to spend on schools is referred to as budgeted expenditure. This has increased in 2023-24 by 8%, compared to 2022-23. It has increased by 26% since 2019-20. This is a 5.3% real terms increase since 2019-20 and a real terms 1.1% increase since 2010-11.
- School budget reserves, the money schools themselves hold and as reported at a one-off point in the year, have been historically high for the past couple of years, although the Welsh Government says this is misrepresentative and a temporary position.
- The WLGA has warned of the inflationary pressures facing schools and reported overspends and budget gaps across all local authorities.
- The Welsh Government describes the overall current financial position as the toughest since devolution and the Minister for Education and Welsh Language says there are “no easy answers” to the budget pressures facing schools.

2. How are schools in Wales funded?

2.1. Un-hypothecated funding for local authorities

The large majority of funding for schools comes from local authorities, which in turn receive the majority of their funding from the annual local government settlement set by the Welsh Government.

The **local government settlement is un-hypothecated**, meaning it is for each local authority to decide how to allocate their available resources to the various services they provide, including education, and within that how much funding they give to schools.

There are **three main steps** to the process for setting school budgets:

- Firstly, the Welsh Government provides each local authority with its **Revenue Support Grant (RSG)**. Together with its redistributed non-domestic rates allocation, this makes up a local authority's Aggregate External Finance (AEF). Each local authority uses this plus the money it raises from council tax to fund the range of services it provides, including education. Each **local authority's RSG is arrived at using a formula**, based on Standard Spending Assessments (SSA) which are notional calculations of how much each local authority needs to maintain a standard level of service. SSAs are broken down into Indicator Based Assessments (IBA) which model notionally the amount needed in each service sector. 'School services' is one of the SSA sectors used for the IBAs.¹

¹ The Welsh Government says SSAs and IBAs are not spending targets and should not be treated as such. They represent a notional estimate of what a local authority needs to provide a standard level of service (although they are dependent on the overall quantum of funding made available by the Welsh Government for the local government settlement). They also build in an assumption of what the local authority can raise from council tax.

-
- Secondly, once they have decided how much of their overall budget to allocate to education, local authorities set **three tiers of education budget**:
 - The Local Authority Education Budget is for central functions relating to education, including but not wholly comprising expenditure on schools.
 - The Schools Budget contains expenditure which is directly aimed at supporting schools but considered to be more efficiently administered centrally.
 - The Individual Schools Budget (ISB) is the remainder of education funding which is delegated to schools.

 - Thirdly, the local authority sets the **individual budget for each school** it maintains, apportioning the ISB according to its own locally determined formula, within the parameters set by the School Funding (Wales) Regulations 2010.

2.2. Ring-fenced funding targeted at school improvement and supporting the education of disadvantaged pupils

On top of the budget each school receives from their local authority, the Welsh Government uses a number of funding streams from its central education budget to support the implementation of **certain policies and priorities** or **target additional funding**. These take the form of specific grants distributed via the regional school improvement consortia, such as the Regional Consortia School Improvement Grant (RCSIG) and the Pupil Development Grant (PDG).

Most of the PDG, which supplements schools' income based on the number of their pupils who are eligible for free school meals (eFSM), is passported in its entirety to schools. A smaller portion of the PDG is given to the regional consortia to distribute to support the education of Looked After Children and adopted children.

The Welsh Government allocates the RCSIG to the regional consortia who pass some of this money to schools and spend it on various improvement initiatives. A breakdown of the RCSIG can be found in the Minister for Education and Welsh Language's paper to the Children, Young People and Education Committee (CYPE) on the 2023-24 budget (see Annex D).

3. Current funding position

3.1. Local Government Settlement 2023-24

As explained in section 2 above, the predominant source of funding for schools' budgets is provided by the Welsh Government to local authorities through the un-hypothecated Aggregate External Finance (AEF) within the local government settlement.

The Final Local Government Settlement 2023-24 provided a **7.9% overall increase to local authorities** (with no local authority receiving less than 6.5%), compared to 2022-23. It is for **local authorities to decide on which services this increase is spent**.

Whilst reiterating that local authorities are responsible for providing schools with their core funding, the Welsh Government pointed to money that it has included in the un-hypothecated Revenue Support Grant (RSG), within the Local Government Settlement, for local authorities to give schools.

The Minister for Finance and Local Government said in Plenary in December 2022:

An additional £227m is being provided to local government through the settlement to help local authorities safeguard the important and wide range of services they provide, **including directly funding schools**. As a result of spending decisions made in relation to education in England, Wales received a **consequential of £117m a year in the Autumn Statement [November 2022]**. Through the choices we have taken, this is being **provided in full to local government**. [bold is our emphasis]

However, **local authorities had to meet the costs of the initial 5% 2022/23 academic year teachers' pay award from within their own resources**. The Welsh Government said this was reflected in the 7.9% increase it gave local authorities for 2023-24 and an earlier increase of 9.4% for 2022-23.

The Minister told the Children Young People and Education (CYPE) Committee during budget scrutiny that the cost to local authorities of the teachers' pay award was **£44m** between September 2022 and March 2023 and **£75m** for the full financial year of 2023-24. The CYPE Committee questioned how much of the additional funding for local authorities to spend on schools would be left after they had implemented the teachers' pay award. This is discussed further in the

CYPE Committee's report on the 2023-24 budget (paras 51-54 and paras 104-105) and in the Welsh Government's response (recommendation 5).

[A further 3% pay award for 2022/23 was agreed with teachers in February 2023. The Welsh Government provided grant funding to local authorities for this additional 3% element.]

3.2. Funding from the education budget

The Welsh Government is providing schools with **£121 million of PDG** in 2023-24 to supplement the core budgets they receive from local authorities, based on the numbers of eFSM pupils on their roll (£1,150 is allocated per eligible pupil).

The Welsh Government is also providing **£163 million of school improvement funding** via the regional consortia.

3.3. Budgeted expenditure on schools

The Welsh Government publishes **data annually on the total amount of expenditure that local authorities budget for schools**. This includes schools' core

budgets, provided by local authorities, and financed from the RSG, and the grant funding from the Welsh Government’s Education budget. Table 1 below provides data for recent years.

Table 1: Gross budgeted expenditure on schools

	Gross Budgeted Expenditure on schools £ Billion	£ Per Pupil Gross Budgeted Expenditure on schools	Percentage delegated to schools
2023-24	3.343	7327	81.9
2022-23	3.096	6773	82.9
2021-22	2.913	6387	83.4
2020-21	2.822	6203	83.7
2019-20	2.657	5857	83.9
2018-19	2.566	5675	84.2
2017-18	2.543	5628	84.2
2016-17	2.519	5570	84.3
2015-16	2.496	5526	83.8
2014-15	2.528	5607	82.9
2013-14	2.519	5594	82.3
2012-13	2.495	5520	81.0
2011-12	2.470	5451	76.2
2010-11	2.458	5409	75.0

Source: Welsh Government, [Statistical Bulletins: Local authority budgeted expenditure on schools](#) (several years’ editions)

- Total funding for schools in 2023-24 is 8.0% higher than in 2022-23 (5.3% higher in real terms). Funding per pupil is 8.2% higher (5.5% higher in real terms).
- Funding has risen since 2019-20 by 25.8% in cash terms and 9.1% in real terms. Increases per pupil are 25.1% in cash terms and 8.5% in real terms.
- Taking a longer backward look, funding has increased in real terms by 1.1% (0.7% per pupil) since 2010-11. Before this year (2023-24), there had been a real terms decrease in funding since 2010-11.

[Real terms changes are calculated using latest [GDP deflators data](#) published by HM Treasury in June 2023.]

3.4. School reserves

The Welsh Government also publishes [annual data on the budget reserves held by schools](#). This is captured as at the end of March each year. Table 2 below provides data for recent years:

Table 2: Reserves held by schools

	Total	Per Pupil
March 2022	£301m	£659
March 2021	£181m	£393
March 2020	£32m	£70
March 2019	£46m	£102
March 2018	£50m	£111
March 2017	£46m	£102
March 2016	£64m	£142
March 2015	£64m	£141
March 2014	£60m	£132

Source: Welsh Government, [Statistical First Release: Reserves held by schools](#) (several years' editions)

Levels of reserves in the past two years (as at 31 March) have been historically high. The Welsh Government's explanation has been that, due to the pandemic, schools received additional resources relatively late in the financial year, resulting in a misleading picture. It has said that the high level of reserves reported in recent years is a temporary position due to school closures and reduced activity during the pandemic.

This is discussed further in the [CYPE Committee's report on the 2023-24 budget](#) (paras 65-67 and paras 112-114) and in the [Welsh Government's response](#) (recommendations 10-11).

4. The financial outlook facing the public sector

The Welsh Government described the 2022-23 budget-setting round as “one of the toughest” since devolution, pointing to 40 year-high inflation rates, and “soaring” energy prices, both at the same time that living standards are falling. The Minister for Finance and Local Government said Wales’ funding settlement from Westminster was “not sufficient to meet all these extraordinary pressures, let alone all our priorities in 2023-24”. The Minister said that, even after an additional £1.2 billion over two years resulting from the UK Government’s Autumn Statement, Wales’ settlement was still worth up to £3 billion less in real terms and up to £1 billion less in 2023-24.

In its response to the Finance Committee’s consultation ahead of the 2022-23 Draft Budget, the Welsh Local Government Association (WLGA) warned that schools were facing inflationary pressures of £177 million and £114 million in 2023-24 and 2024-25 respectively. The WLGA also reported that every local authority across Wales was reporting an overspend in 2022-23 and budget gaps in future years. It said that, other than the experience of the early months of the pandemic, there was no precedent for pressures of this scale escalating so quickly.

The Minister for Education and Welsh Language reiterates this context in his letter regarding this petition. He says he “recognise[s] that the cost-of-living crisis is putting schools and local authorities under significant pressure” but “there are no easy answers to resolving the[se] issues”.

The First Minister issued a statement on 9 August 2023 following a meeting of the Welsh Government’s Cabinet to discuss financial pressures. He said the current position was the “toughest financial situation we have faced since devolution” and:

.... our financial position after the UK Spring Budget in March, was up to £900m lower in real terms than when that budget was set by the UK Government at the time of the last spending review in 2021. (...)

The Cabinet will be working over the summer to mitigate these budgetary pressures based on our principles, which include protecting frontline public services, as far as possible, and targeting support towards those at greatest need.

5. Previous scrutiny in the Senedd

The Fifth Senedd's Petitions Committee considered a similar petition in 2019, which was to "Protect school funding or admit to the weakening of service provision" (P-05-872). This petition was drawn to the attention of the Fifth Senedd's Children, Young People and Education Committee which was undertaking a policy inquiry into school funding at the time. This looked at both the sufficiency of the overall quantum of funding being made available to schools and the way in which that funding is distributed. In response, the Welsh Government commissioned a review by education economist, Luke Sibieta.

The current CYPE Committee continues to scrutinise the level of funding for schools, including in its annual budget scrutiny, most recently in January 2023.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

Jeremy Miles AS/MS
Gweinidog y Gymraeg ac Addysg
Minister for Education and Welsh Language



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref P-06-1348
Ein cyf/Our ref JMEWL/01431/23

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

4 September 2023

Dear Jack,

Thank you for your letter of 15 August regarding Petition P-06-1348 Review the inadequate funding for Schools in Wales

We recognise that high levels of inflation and energy costs are causing financial pressures on our public services, including schools, and we remain committed to doing everything we can to support them. The Autumn Statement confirmed that the UK is entering what looks set to be a lengthy recession, which will result in real and significant costs for people across the UK.

The rapid rise in inflation has meant that the Welsh Government's budget is now worth less than it was at the time at which we set our spending plans. Our funding settlement from the UK Government, including the additional funding in the Autumn Statement, is not enough to meet the inflationary pressures Wales is facing, let alone all our priorities in 2023-24.

The amount of funding set aside for school budgets is for local authorities to determine, the Welsh Government does not fund schools directly. The Welsh Government provides funding to local authorities for pre-16 provision in schools in Wales mainly through the local government settlement in the form of the Revenue Support Grant (RSG). The RSG is not ring-fenced; the funding allocated to each authority is available to the authority to spend as it sees fit on the range of services for which it is responsible, including schools. This is in line with the Welsh Government's policy that LAs are best placed to judge local needs and circumstances and to fund schools accordingly.

A school governing body may only set a deficit budget with the consent of the authority. Where schools have large deficits local authorities should be working closely with them to ensure that they are brought back to a modest surplus as soon as possible. Schools in deficit should have a robust recovery plan in place and this should be agreed and monitored by the authority.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Jeremy.Miles@llyw.cymru
Correspondence.Jeremy.Miles@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Despite our budget this year being up to £900m lower in real terms than expected initially, we ensured local authorities, who fund schools, received an increase of 7.9% to their budgets compared to the previous year to reflect the priority the Government gives to local government services. The annual local government settlement provides a significant proportion of local authorities' overall funding. For 2023-24, the settlement distributes over £5.5bn between the 22 Welsh local authorities. This funding is unhypothecated so that Authorities may make decisions to reflect local circumstances and priorities.

In 2023-24, local authorities in Wales are forecast to spend £9.206bn in total. Schools expenditure in 2023-24 is budgeted to be £3.343bn, an increase of 8.0% over the previous year. Schools expenditure per pupil is budgeted to be £7,327, a year-on-year increase of 8.2% or £554. The budget per pupil can be broken down into £5,998 per pupil delegated to schools and £1,328 per pupil retained for centrally funded school services.

Although funding for schools in Wales is mainly provided through the local government settlement, the Welsh Government's education budget also supports spending in and on schools, teachers and wider education programmes. For 2023-24 this includes, for example, £37.5m to support schools through the Recruit, Recover and Raise Standards Programme; and over £120m funding for schools through the Pupil Development Grant.

Local authorities, when carrying out their duty to ensure the availability of suitable education provision in their area, should work with their maintained schools to evaluate the effectiveness of their school funding arrangements in supporting and raising the achievement of learners, including those with ALN. Schools have the opportunity to influence their local authority's decisions on school budgets by engaging in dialogue with authorities including through their budget forum, which is required in law.

Individual schools are responsible for deciding the procedures they adopt for meeting the needs of all children, for observing and assessing their progress and in most cases, for deciding the nature of any additional support they put in place.

We have invested over £62 million of revenue grant funding in ALN between 2020 and 2023 and we increased the ALN implementation grant by £5.4m, to £12m, across Wales for 2023-24. This additional grant is intended to increase the resources for schools to implement the ALN system and lead whole-school strategies to embed inclusive education.

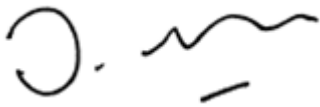
In relation to school maintenance, we also continue to invest c£300m per annum in our schools estate through our Sustainable Communities for Learning Programme (SCfL), primarily focussing on strategic delivery of new build and/or large-scale refurbishments. This contributes towards the reduction of backlog maintenance and decarbonisation of the education estate in Wales, as well as reducing revenue costs. However, we still recognise the wider education estate, and have funded capital maintenance works with £43m in 2019-20, £50m in 2020-21 and a further £50m in 2021-22. During 2022-23 we provided an allocation of £60m (£50m schools and £10m colleges) to local authorities and Further Education Institutions to support capital maintenance energy efficiency works across schools and colleges in Wales.

I recognise the pressure headteachers and senior education staff are under and I have been very clear that tackling workload for school staff is a priority, recognising the inextricable link between workload and wellbeing. I am committed to reducing unnecessary bureaucracy for school leaders, recognising the positive impact this has on wider teaching staff. We commenced workload negotiation meetings at the end of April with employers, teacher unions, Estyn and other middle tier partners, and in July I made a [statement](#) about the

progress that has been made. While significant progress has been made there is still much to do and work is continuing to reduce workload and reduce the burden on education staff, to ensure tangible improvements are seen by education staff at school level. Alongside the Welsh Government's focus on reducing workload and bureaucracy, we have also provided further funding to support well-being services for school staff in Wales. The Well-being in Wales programme is now in its third year and provides support to the teaching profession through a bespoke range of services provided by the education charity Education Support.

I recognise that the cost-of-living crisis is putting schools and local authorities under significant pressure, and that there are no easy answers to resolving the issues being faced. We know it is vital that communication channels are active during these especially difficult times and are engaging closely with local government on the budget and other issues.

Yours sincerely,

A handwritten signature in black ink, consisting of a large 'J' followed by a series of wavy lines and a short horizontal stroke at the end.

Jeremy Miles AS/MS

Gweinidog y Gymraeg ac Addysg

Minister for Education and Welsh Language

**P-06-1358 Review the inadequate funding for Schools in Wales,
Correspondence – Petitioner to Committee, 18.09.23**

**Brief for Senedd Petitions Committee
25th September 2023**

**Petition: Review the
inadequate funding for
Schools in Wales**

**Drawn up by Chairs of School Governor Associations
from eight Local Authorities throughout Wales.**

Contents

1. Introduction	3
2. A major crisis in Welsh Education Funding.....	3
3. The impact on children and staff at Welsh Schools.....	4
4. Response to Minister’s letter to Petitions Committee Chair.....	4
5. Conclusion.....	5
Appendix 1 – Western Mail – Wales Online - Article reporting on Vale Learning and Culture Committee 15/6/23	6
Appendix 2 - Detailed consequences for schools in the Vale of Glamorgan May 2023	9
Barry Primary Cluster – snapshot from mid-May 2023	9
Penarth Primary Cluster md-May 2023	14
Rural Vale Primary Cluster Mid-May 2023.....	19
A large Primary School	22
A small rural Primary School	24
A Secondary School.....	26

1. Introduction

This petition was prepared by Chairs of Governor Associations throughout Wales under the auspices of Wales School Governors – Llywodraethwyr Ysgolion Cymru – Registered charity 1179341.

It is the result of several meetings from representatives of eight Local Authorities - Conwy, Wrexham, Bridgend, Cardiff, Merthyr, Newport, Rhondda Cynon Taf, Vale of Glamorgan.

Welsh Government's funding for schools in Wales has not kept up with the cost-of-living increases and increases in staff salaries. Many schools have set deficit budgets for 2023/2024 financial year. Those which have managed to set balanced budgets, have used their reserves and have had to make significant savings. More, perhaps most, schools will be posting deficit budgets for 2023/24.

This has a hugely negative effect on children and young people in Wales.

2. A major crisis in Welsh Education Funding

We can speak in general terms about the inadequate funding for schools, but we have gathered information on its effect at the chalkface for one Local Authority in some detail because it is a microcosm of what is happening elsewhere. As an unfunded group, we have no resources to carry out an in-depth study covering the whole of Wales.

In the past, the Vale of Glamorgan has been the lowest per pupil spend on Education for many years, despite spending more than the Standard Spending Assessment suggests. However, in the latest statistics for spending per pupil, the Vale has risen to fifth from bottom behind Newport, Swansea, Bridgend and Monmouthshire, so it represents a good comparator. See www.gov.wales/sites/default/files/statistics-and-research/2023-07/local-authority-budgeted-expenditure-schools-april-2023-march-2024-524.pdf

Appendix 1 is a newspaper report on the Vale of Glamorgan Learning and Culture Scrutiny Committee held on 15th June. The meeting and presentations can be viewed at <https://www.youtube.com/watch?v=kOilwribJAE&list=PLzt4i14pgqIEhf6Nqf58QWzDmFZIS6XJO&index=1>. The news report is at <https://www.walesonline.co.uk/news/education/headteacher-speaks-bleak-future-money-27140929>

Three Governors and a Primary Headteacher eloquently explained how pupils and staff in their schools have been negatively affected.

At the Vale of Glamorgan Learning and Culture Scrutiny Committee held on 14th September 2023, an officer of the Council, presenting the current state of the Vale Education Revenue Budget stated that 21 schools in the Vale have set deficit budgets for 2023/24. Of these 18 have been unable to set three-year recovery plans. **The officer confirmed that there is no mismanagement involved and that the Authority does not intend to take over their budgets, although this is their right under the Schools Regulations.**

Essentially 18 out of 51 schools in the Vale are unable to discharge their responsibility to provide Education to Welsh Government standards for the amount of funds they have been allocated. There are schools all over Wales in a similar position.

3. The impact on children and staff at Welsh Schools

The impacts on children in Welsh Schools are:

- Reduction in the quality of learning & teaching
- Increased adult/learner ratios
- Health & safety - less adult supervision, for example at lunchtime and breaks
- Fewer support staff, meaning that children with Additional Learning Needs are at risk of not receiving the help they need.
- Larger classes – poorer teacher to learner ratios
- Fewer adults in classrooms putting everyone at risk.
- Fewer teachers – either through non-replacement or redundancies.
- Less maintenance on buildings leading to safety concerns
- Increased stress on Headteachers and Senior staff, leading to increased sickness absence and burn-out.

And at the same time schools are struggling to implement educational reforms

- The implementation of the Additional Learning Needs Act and the Education Tribunal Act 2018 and the increase in numbers of learners with additional needs
- Curriculum for Wales
- New assessment arrangements
- Community Focused Schools
- Well-being of Future Generations Act
- Welsh Language Strategy
- The Equality Act 2010 including accessibility strategy

We urge the Welsh Government to urgently review the level of funding for Education for this and next financial years. Our children deserve the best education and must not suffer through funding cuts.

Attached to this document as Appendix 2 is a snapshot taken in May of the cuts in staffing (teaching and non-teaching) , curriculum, building maintenance etc.

4. Response to Minister's letter to Petitions Committee Chair

- A) The Minister states that funding for schools is the responsibility of Local Authorities, which is somewhat disingenuous. The way funding works is that:
- The Funding Formula for overall Local Authority settlement each year is built up from a large number of detailed calculations, some of which are aggregated to form the Education SSA (Standard Spending Assessment.)
 - Because the Local Authority Settlement is unhypothecated, each authority is in theory at liberty to spend as much or as little as it likes on Education as opposed to Social Services, roads etc. For our example, the Vale of Glamorgan for many years has allocated more than the Education SSA.
 - Welsh Government compensates for the acknowledged inadequacies of the funding formula by having a large number of grants which are allocated outside the formula, for example, the Pupil Development Grant (formerly the Pupil Deprivation Grant) based on

the number of children eligible for free school meals, Grants for teacher professional learning, etc.

- However, Local Authorities and schools are also bound by the School Funding (Wales) Regulations Act 2010, and other regulation which put duties upon them to deliver a well-rounded curriculum, a safe environment for learning, and many other items such as provision for those with Additional Learning needs (ALN). All this is regularly inspected by Estyn. This is the means by which Welsh Government effectively controls Education spending by schools.

As shown above, a significant number of schools in Wales can no longer meet these requirements within the funding they receive.

- B) The Minister draws attention to the need for school governing bodies to have a recovery plan in place should they set a deficit budget. As shown above, a significant number of schools cannot do this.
- C) The Minister refers to continuing progress “to reduce workload and the burden on education staff”. This is laudable, but the effect of insufficient funding is to reduce the number of staff – teaching non-teaching – with consequent **increase** in workload.

5. Conclusion

A representative group of Governor Associations throughout Wales call for a Senedd debate to bring the current parlous state of school funding in Wales to public consciousness.

Welsh Government deals in large numbers and percentages of apparent increases, as outlined in the Minister’s letter.

The reality for schools in many parts of Wales is that have been allocated insufficient money to meet their statutory and moral obligation to educate the learners in their care safely and adequately.

Wales’s education system is going through a period of major change for the better, with welcome Welsh Government initiatives like the innovative new Curriculum and the provision for learners with Alternative Learning Needs, but all this needs proper funding.

Many schools in Wales are effectively bankrupt.

The children and young people of Wales in Wales deserve better. They get only one chance at their education. It needs to be properly funded.

Appendix 1 – Western Mail – Wales Online - Article reporting on [Vale Learning and Culture Committee 15/6/23](#)

Head of Romilly Primary School, Barry, in finance warning

17th June

By Ted Peskett - Local Democracy Reporter

A BARRY headteacher has said the financial pressure on their school was so great that they didn't have the capacity to give some of their most vulnerable children the support they needed.

Headteacher of Romilly Primary School, Katy Williams, was speaking at a Vale of Glamorgan Council scrutiny committee meeting on Thursday, June 15, which focused on the financial pressures schools in the county were facing.

A report presented to the committee showed that Vale of Glamorgan Council was the most poorly funded local authority for education in Wales.

As with other local authorities across the country, it is facing increased financial pressures and an increasing number of schools in the county are being faced with deficit budgets.

Ms Williams said Romilly Primary School, which is one of the largest in Wales but also one of the most poorly funded, has had to cut down on staff and now can't run any emotional literacy support for children.

The headteacher also opened up on the impact that deficits at schools across Barry were having on members of staff, adding that it had been making some headteachers unwell.

Ms Williams said: "We have been struggling with a deficit for quite a while and we do have a large deficit.

"The future looks quite bleak for us, but we have done so much already, like making significant efforts to reduce and contain this deficit."

Ms Williams said the school was about £300,000 adrift each year and was also struggling to afford extra caretakers. The school site, which consists of six buildings, currently has one caretaker.

"We have got to keep the children safe," she said. "The building needs to be safe and we need to deliver a curriculum, but it is just having a huge impact, as you can imagine, on the pupils and on the staff wellbeing in itself."

A number of combined factors, including the cost-of-living crisis, an increase in the number of learners with additional needs and new assessment arrangements are coinciding to put more demands on schools in the Vale of Glamorgan.

With the council facing a budget deficit of about £9 million, schools in the county are expected to be left in a precarious situation.

Most schools will post a deficit budget for 2023/24, according to the Vale School Governors Association (VSGA).

With this being the first year that some schools have had to deal with the prospect of deficit budgets, Ms Williams said she was aware of some headteachers who were waking up in the middle of the night and whose mental and physical health was being affected.

Ms Williams said she would have to get rid of five teachers if she wanted to balance the books at the school – something which is not an option.

She added: “That would mean five classes of children that do not have a teacher in front of them. I don’t, believe it or not, have spare teachers that are floating around doing nothing.

“The alternative is it is 10 LSAs (learning support assistants) and I just can’t do that.”

A Vale of Glamorgan Council report on education funds states that the council has the lowest rate of funding per pupil out of the 22 local authorities across Wales, at £6,045.

This is £728 per pupil less than the Wales average of £6,773 per pupil.

The VSGA argues that a fresh look is needed on the Welsh Government’s formula which is used to determine how much each local authority should receive in funding.

Chair of the VSGA, Dr Martin Price said the formula’s use of 1991 census data was “fundamentally absurd”.

Dr Price added: “There have been three censuses since then and Wales is very different from 1991 and it is also different from when the formula was last reviewed, which was around the year 2000.”

A Welsh Government spokesperson said: “The amount of funding set aside for school budgets is for local authorities to determine, the Welsh Government does not fund schools directly.

“This is in line with the Welsh Government’s policy that local authorities are best placed to judge local needs and circumstances and to fund schools accordingly.

“Despite our budget this year being up to £900m lower in real terms than expected initially, we ensured local authorities, who fund schools, received an increase of 7.9 per cent to their budgets compared to the previous year so that they can continue to prioritise school funding.”

The deadline for the agreement of individual school budgets for 2023/24 is June 30.

Vale of Glamorgan Council said another report on education funding would be published in September when the full picture on school budgets for 2023/24 would be clearer.

Appendix 2 - Detailed consequences for schools in the Vale of Glamorgan May 2023
Barry Primary Cluster – snapshot from mid-May 2023

School	Carry forward (tbc) 22/23 £	Final projected figure 23/24 £	Where have cuts been made to achieve this?	Impact of cuts for this financial year	Projected final figure 24/25 £
1	33,000	-226,850	<ul style="list-style-type: none"> Not replacing member of SLT on maternity leave (reduction of ALN support) Reduction in teaching and support staff Reduction in teaching resources including enrichment and school visits. Reduction in repairs and maintenance budget 	<ul style="list-style-type: none"> A reduced ALN offer – impact on standards and potential increased exclusions and reduced attendance. Classrooms not as well resourced, quality of learning and teaching compromised. Reduced curriculum enhancement, including residential visits. School building will deteriorate 	-408,126
2	60,000	-21,572	<ul style="list-style-type: none"> Reduction in teaching resources including enrichment and school visits. Reduced staffing 	<ul style="list-style-type: none"> Classrooms not as well resourced, quality of learning and teaching compromised. Reduced curriculum enhancement 	-164,249
3	10,000	-143,553	<p>Not replacing SLT member for summer term</p> <p>Unable to extend short term contracts for LSAs supporting ALN pupils</p> <p>Reduction in repairs and maintenance budget</p> <p>Reduction in teaching resources including enrichment and school visits</p> <p>Removal of general LSA support in PS3 classes</p>	<p>Reduction of ALN support</p> <p>Impact on standards and possible impact on behaviour/ exclusions and ability to offer therapeutic support</p> <p>Enhanced curriculum offer will be reduced</p> <p>School building will deteriorate</p> <p>Lack of additional LSA support in PS3 classes</p> <p>Increased spend on ALN support/Match funding or school funding means less available</p>	313,869

				support for wellbeing/ catch up interventions	
4	-52,000	-368,072	<p>Reducing the number of LSA's who support 1-1 pupils from 9 to 5</p> <p>Intervention LSA's to reduce</p> <p>Reduction in Repairs and Maintenance budget</p> <p>Reduction in Teaching resources including school visits</p> <p>Removal of Class LSA's for PS3</p>	<p>Reduction of ALN support Impact on standards and behaviour, increasing the exclusions</p> <p>School building will deteriorate</p> <p>Lack of LSA support in PS3 will impact on standards and behaviour</p> <p>Enhanced curriculum offer reduced</p>	-857,798
5	£13k balance	-£60k	<p>Reduced building costs to minimum</p> <p>Reducing LSAs – interventions</p> <p>Reducing teaching materials cost centre</p> <p>Reducing Wellbeing support</p>	<p>Reduced interventions for pupils</p> <p>Plans for improving educational setting halted</p> <p>Poorer learning environment</p> <p>Reduced resources to support day – to day lessons</p> <p>Reduce staff to support extra-curricular activities</p> <p>Reduced school visits – less money to support (inc challenges to staff appropriately)</p> <p>Impact on staff wellbeing</p> <p>Potential increase of staff sickness</p>	- £115K

				Increase parental complaints	
6	0	-25,000	<p>Not able to employ additional LSA'S to work with individuals</p> <p>Reduced ELSA offer</p> <p>Reduced Teacher resources</p> <p>Reduced maintenance-cancellation of improvements needed to school building</p> <p>Reduced planned admin hours</p>	<p>Very Likely redundancies for 24/25 +25/26</p>	-220,00
7	-0	-154,202	<ul style="list-style-type: none"> • Reduction in teaching resources including enrichment and school visits. • Reduced staffing • Reduction in repairs and maintenance budget • Removal of general and intervention LSA support in all classes 	<ul style="list-style-type: none"> • A reduced ALN offer – impact on standards and potential increased exclusions and reduced attendance. • School building will continue to deteriorate and may lead to further Health and Safety issues • Lack of LSA support will impact on standards and behaviour 	-368,989
8	£100k	-£195k	<p>Reduction in LSA interventions and those with specific 1:1 support</p> <p>Use of class LSA to cover 1:1 where essential</p> <p>Reduced maintenance of planned projects – decoration, damp, play equipment</p>	<p>Reduction of ELSA offer</p> <p>Impact to environment including buildings and play equipment</p> <p>Likely reduction in staff (LSA)</p> <p>Reduction in staff release for professional development</p>	-509505

			<p>Reduction in teaching and Learning resources</p> <p>Reduction in planned visits and trips</p> <p>Reduction in cover at lunch time – not replacing MDS</p>	<p>Reduction in staff wellbeing due to poorer work-life balance</p> <p>Reduction in community resources</p> <p>Reduction in school trips and residential visits because of inability to subsidise</p>	
9	£100	-£107,053	<ul style="list-style-type: none"> - 2 x full time LSA's retiring this year but not being replaced - Family link LSA going back into class • Planned projects to improve outdoor facilities shelved • Cutback to bare bones on many cost centers 	<p>Possible redundancies in the future</p> <p>Further cutbacks on support staff which will mean less wellbeing interventions for our most vulnerable children</p> <p>Cutbacks on staff professional development opportunities</p>	-£271,843
10	£50k	-£81,021	<p>Reduction in LSAs 1:1 support</p> <p>Reduction in interventions</p> <p>Planned projects to improve the environment cancelled</p> <p>Reduction in teaching and learning resources</p> <p>Reduction in financial support to families for experiences inc. Day visits and residential</p> <p>Reduction in budget for</p>	<p>Reduction of ALN support and interventions</p> <p>Impact on standards and behaviour, increasing the need for PSPs</p> <p>Learning environments will not be developed further / will deteriorate,</p> <p>Provision for the curriculum will be limited</p> <p>Professional learning opportunities will be reduced, which will impact</p>	-555,997

			<p>professional learning</p> <p>Reduction in teaching staff for the next academic year</p>	<p>standards and staff morale</p> <p>Class sizes will increase, meeting the needs of individuals will become increasingly difficult.</p>	
11	£100K	-250,000	<p>No appointment of new staff therefore a reduction in support staff x3</p> <p>Reduction in teaching materials,</p>	<p>Less learning support for pupils</p> <p>Provision for the curriculum limited</p> <p>Learning interventions limited or even stopped</p>	-190,000
12	-44,000	-50,000	<p>Reducing the number of LSA's who support 1-1 pupils</p> <p>Intervention LSA's to reduce</p> <p>Reduction in Teaching resources including school visits</p> <p>Removal of Class LSA's for PS3</p> <p>Planned projects to improve outdoor facilities shelved</p>	<p>Reduction of ALN support</p> <p>Impact on standards and behaviour, increasing the exclusions</p> <p>Reduction in staff release for professional development</p> <p>Reduction in staff wellbeing due to poorer work-life balance</p> <p>Reduction in community resources</p> <p>Reduction in school trips and residential visits because of inability to subsidise</p> <p>Learning interventions limited or even stopped</p>	-65129

Penarth Primary Cluster md-May 2023

School	Carry forward 22/23 £	Final projected figure 23/24 £	Where have cuts been made to achieve this?	Impact of cuts for this financial year	Projected final figure 24/25 £
1	47,000	-127,925	<ul style="list-style-type: none"> • Reduction in teaching and support staff • Reduction in teaching resources including enrichment and school visits. • No allocation in repairs and maintenance budget 	<ul style="list-style-type: none"> • New curriculum cannot be fully met without correct funding. • Classrooms not as well resourced, quality of learning and teaching compromised. • Reduced curriculum enhancement, including residential visits. • School building will deteriorate 	-261,142
2	20,000	-206,850	<ul style="list-style-type: none"> • Not replacing member of SLT on maternity leave (reduction of ALN support) • Reduction in teaching and support staff • Reduction in teaching resources including enrichment and school visits. • Reduction in repairs and maintenance budget 	<ul style="list-style-type: none"> • A reduced ALN offer – impact on standards and potential increased exclusions and reduced attendance. • Classrooms not as well resourced, quality of learning and teaching compromised. • Reduced curriculum enhancement, including residential visits. • School building will deteriorate 	-408,126
3	650,000	-400,000	<ul style="list-style-type: none"> • No sickness cover, 	<ul style="list-style-type: none"> • Pupils sent home, 	-3,210,326

			<ul style="list-style-type: none"> • no teaching materials, • no ICT budget, • no trips, • won't replace worn out minibus 	<ul style="list-style-type: none"> • Lessons less stimulating • No ICT kit replaced • Far fewer enrichment activities 	
4	55,000	-£68,000 Started at - £293,000	<ul style="list-style-type: none"> • No replacement of Midday Supervisor • Internally replaced Breakfast Club supervisor • Reduction in teaching resources including enrichment and school visits. • Reduction in repairs and maintenance budget • Reduction in hours of Temporary LSA staff working 1:1 pupils • Reduction of whole class music tuition • Proposed income of ANF hours currently being provided through school budget, • Taking on CSC Lead Practitioner roles, school fundraising, hall lettings. 	<ul style="list-style-type: none"> • No meet and greet for vulnerable pupils • ALN pupils with risk assessments would only be able to attend school for the funded hours • Pupils working below expected level will not make progress • Reduced Educational Visits due to lack of staff/cover • Staff morale and wellbeing due to workload, stress of demands of distressed pupils, facing redundancy. • Classrooms not as well resourced, quality of learning and teaching compromised. • Reduced curriculum enhancement, including residential visits. • School building will deteriorate 	-170,000
5	estimated £59,000	-58,500	<ul style="list-style-type: none"> • Reduction in teaching resources including 	<ul style="list-style-type: none"> • Reduction in learning support staff that would 	-186,307

			<ul style="list-style-type: none"> enrichment activities • Reduction in teacher supply costs to provide non-contact time for school improvement priorities • Reduction in ICT hardware • Suspension on maintenance projects due to significant cost centre reductions to offset deficit 	<ul style="list-style-type: none"> focus on ELSA / Nurture and wellbeing • Support staff to cover staff absences due to increases in sickness scheme costs and costs of cover during excess period • Staff redeployed to cover ALN support due to reductions in LSA staff numbers both on budget & agency costs • Suspension of all internal decoration projects 	
6	90,000	-44,004	<ul style="list-style-type: none"> • Removal of interventions, grants being used to sustain current staffing • Reduction in support staff • Reduction in repairs and maintenance budget 	<ul style="list-style-type: none"> • Classrooms not as well resourced, quality of learning and teaching compromised. • Deterioration of school building • Reduced professional learning opportunities 	-181,033
7	260,000	-37,550	<ul style="list-style-type: none"> • Restructure of leadership • Teachers leaving being replaced with NQTs • Training budget removed • Minimal budget for repairs and maintenance 	<ul style="list-style-type: none"> • Leadership capacity diminished-greater workload and responsibilities on other leaders-strategic implementation and school improvement priorities will not move forward-workload pressure for staff 	-411,272

				<ul style="list-style-type: none"> • Potential imbalance of experienced and newer members of staff – increased responsibilities for AOLE leadership on others- NQT mentoring and support by leaders already in reduced leadership capacity from leadership changes • Professional learning reduced to staff meetings only- teaching and learning will not move forward- potentially will regress • Building not maintained, not in good condition already so will deteriorate further • Recruitment and retention over time will be affected by the above- increased workload, working in environments that are not maintained adequately 	
8	Estimated 99,000	-26,000	<ul style="list-style-type: none"> • Reduction in support staff. • Reducing teaching supply budget • Reducing support staff supply budget 	<ul style="list-style-type: none"> • Increased pressure on SLT to cover classes or increased pressure on support staff to cover for 	-230,000

			<p>Reducing teaching materials budget</p> <p>Reducing furniture budget</p> <p>Reducing repairs and maintenance budget by £21,000</p>	<p>absent colleagues. Well-being of staff is a concern.</p>	
9	180,00	-138,689	<ul style="list-style-type: none"> • Unallocated funds available were due to the amalgamation savings of the Nursery and Primary School. This substantial amount has been used to offset the predicted deficit. 	<ul style="list-style-type: none"> • It is preventing us from developing the outside learning area including a Welsh Pod, Extra learning experiences and activities that will enhance the new curriculum for Wales. 	-288,924

Rural Vale Primary Cluster Mid-May 2023

School	Carry forward 22/23 £	Final projected figure 23/24 £	Where have cuts been made to achieve this?	Impact of cuts for this financial year	Projected final figure 24/25 £	Projected final figure 25/26
1	-117,000	-236,330	<ul style="list-style-type: none"> • Not replacing teacher, who is retiring. • SLT (ALNCo dropping ALN duties reduction in TLR – ALN taken on by current HT. • Reduction of support staff employed to match ANF funding. • Reduction in teaching resources – including extra curricular and enrichment opportunities. 	<ul style="list-style-type: none"> • Classrooms not resourced as they should be – essentials not being purchased – parents and school community being asked to provide. • Reduced ALN provision/offer – impact on behaviour (mainly) and standards due to pressures of increased exclusions and parental concerns. • Concerns about staff wellbeing – stress of support staff and dealing with behaviour and complex needs. • Reduced school experiences such as residential visits and school trips etc. 	-373,013	-528,261
2	11,635	10,000	<ul style="list-style-type: none"> • LSA who was on long term supply has now lost her job. The LSA also covers lunchtime duties and this lack of capacity puts additional strain on staff. SLT and teachers have agreed to carry out lunchtime duties on a good will basis. • In order to balance this budget, we have to generate our own revenue up to £60,000 which comes from Governors/HT running a private Childcare and carrying out additional fundraising. • To reduce staff any further would be a health and safety risk. 	<ul style="list-style-type: none"> • School fundraising and the additional revenue from our childcare has to go directly into staffing the school at appropriate levels. • Resources/extra-curricular events will need to reduce as a result of lack of funding. Parents will be asked to provide classroom essentials. • Additional provision to support Mental Health & Wellbeing such as ELSA will have to be reduced on the timetable due to lack of capacity. • Reduce Management time for DH and ALNco which will have a negative impact on ALN provision. • Negative impact on staff well being as their workload/additional duties increase. 	212	-44,312
3	13,000	-65,093	<ul style="list-style-type: none"> • Reduced interventions due to skeleton staff • Unable to renew temporary contract staff 	<ul style="list-style-type: none"> • Less staff to carry out increased need for intervention • Increasing number of ALN children 	-86,234	-73,077

3	13,000	- 65,093	<ul style="list-style-type: none"> • Reduced interventions due to skeleton staff • Unable to renew temporary contract staff • Reduction in teaching resources, school visits and any further enrichment • Reduction in repairs and maintenance budget. Brand new build with new technology at increased service costs. 	<ul style="list-style-type: none"> • Less staff to carry out increased need for intervention • Increasing number of ALN children • Reduced curriculum enhancement through visits and learning • Decreasing ability to fund CPD for staff 	-86,234	-73,077
4	59000	42,560	<ul style="list-style-type: none"> • -Use of reserves held in the Vale for resourcing an extension • -Not replaced 2 members of staff who have left this year • -Significant reduction in all ledger codes especially supply budget and resources 	<ul style="list-style-type: none"> • -Extension will be now be less equipped when completed • -Huge impact on pupils intervention groups, especially ELSA • -Impact on staff training and teaching if staff member is off ill. Classrooms less well resourced which will impact curriculum delivery 	-37,235	-136,908
5	Approx £70k	-£16k	The school carry forward was a lot higher due to the grants from last financial year that could offset salaries. However, we have only just been given this figure (it was -£90k). The remaining deficit will be covered from teaching material and reduced adult support for ALN/Behaviour	Not meeting the needs of pupil IDPs for those with ALN. Using staff to run a nurture group to support behavior but these staff will need to be backfilled in the class they have been taken from.	£123,513	£263,471
6	£96287	- £56055	Reserves from building and maintenance, had to stop all planned building work. Significantly reduce teaching and learning resources spend. Reduce amount of agency supply to cover SLT time, professional learning.	School building will deteriorate. Impact on teaching and learning standards. Increased workload, CPD of staff/ SLT	-103600	-154848

7	44,000	- 33,300	<p>One (0.5FTE) teacher left at Easter and hasn't been replaced. HT teaching one day a week to cover the summer term</p> <p>One LSA leaving in July (not replaced) All costs centres have been reduced to non-realistic levels</p> <p>Mixed year group classes have been established where possible (but this has led to pupils leaving the school = falling roll and less budget)</p>	<p>Reduced ALN offer particularly at Y3-6 – impact on standards and achievement</p> <p>Very little emotional support for pupils</p> <p>Classrooms will not be well resourced</p> <p>Non- essential school trips and activities will be stopped. Only those that can be partly funded and that are within a certain cost will go ahead</p> <p>Vastly reduced curriculum enhancement</p> <p>Limited sporting fixtures (due to transport costs and release of staff)</p> <p>Release of staff is incredibly limited, no flexibility of cover as LSAs are at minimum</p>	- 135,000	- 277,000
---	--------	-------------	--	---	--------------	--------------

8	£89,000	-£110,349 (-£443,566 prior to cut backs)	<ul style="list-style-type: none"> • 1 x teacher leaver and not replaced • 2 x teachers end of temp contract and not extended. • 1 x teacher on secondment with the CSC and not replaced in school structure. • Reduction in Agency staff allocation for both teaching and LSA. • Reduction by £5000 to Education & Training. • Reduction by £12,500 to Repairs and Maintenance. • Reduction by £2,500 to Fire & Burglar Alarms. • Reduction in Teaching Materials by £8,000 	<p>Reduced ALN / SEMH offer - impact upon standards</p> <ul style="list-style-type: none"> • Quality of teaching, learning and well-being of children and staff may be compromised. Reduced curriculum enhancement. • Unable to cover absent staff effectively, quality of learning compromised • Reduced opportunities and professional learning for staff. • A risk of school buildings and compliance to deteriorate. • Any repairs or improvements will need to be reassessed. • Classrooms not as well resourced and quality of teaching and learning compromised. 	-£329,966	
---	---------	---	--	--	-----------	--

A large Primary School

Below is a list of the main impacts identified by the SLT as a result of reductions in School funding. We have approximately 750 pupils in our school.

The School has already made significant efforts to reduce and contain its current deficit by cutting staff and reducing supply cover. This has had a significant impact on workload and provision that can be delivered in the School. We have outlined the main impacts below:

- Since September 2022 we have not been able to run consistent ELSA (Emotional Literacy Support) and since January 2023 we have not been able to run any ELSA interventions. This is because we have redeployed two members of staff who ran these sessions to other roles to save money and try and reduce the deficit. One of these learning support assistants (LSAs) is now a foundation phase (FP) class LSA and the other is used as a higher level teaching assistant (HLTA) to cover classes to reduce supply costs. The Designated Safeguarding Person (DSP) has recently been to a number of Child Protection, Care and Support and CLA (Child who is Looked After) meetings whereby we have had to say that we no longer have the capacity or money to offer these vulnerable children ELSA support.
- In Key Stage Two we have reduced the number of class LSAs to just 2. These LSAs are running support for 540 pupils which is unsustainable. We have a number of children who need support but who we cannot support due to not having a sufficient number of LSAs for KS2.
- We have reduced the number of LSAs in the ALN team to 2 for specialist literacy and speech and language intervention.
- Our Reception Classes have only had 1 LSA per class of 30 since 2020. When Foundation Phase was introduced in Wales, the recommended number of LSAs for Reception was 2 per class of 30.
- When MDS (Midday Supervisors) have resigned/retired, we have not replaced them. There are approximately 540 pupils at one time during lunchtime, meaning our current ratio is 1:54. This ratio is even worse if a MDS is off sick. The senior leadership team (SLT) are used to cover the shortfall but this means they are not available for their other roles during this time or have to work additional hours to make up for work time lost when they are providing lunchtime cover.
- Like all schools we are experiencing a significant increase of pupils with complex needs. Although the School accesses ANF funding, some allocation is not enough to keep certain children, their peers and staff safe. Therefore, to be a fully inclusive school and also to reduce the risk of exclusions, the School has to fund the additional hours from our budget on health and safety grounds. If further budget cuts need to be made exclusions are at risk of rising and we may not be able to meet individual needs.
- The School has been recognised for excellent practice regarding early speech and language provision/interventions. With further pressures to cut spending, this provision will have to stop. The impact of this will be increased behaviour and learning difficulties.
- The School currently has 1 caretaker. The School site is large and the grounds comprise of 6 buildings, a large field and car park. The recommendation for a school of 750 pupils is 1.75 caretakers. This is something we cannot afford and is impacting on the workload of the current caretaker who has recently resigned.
- School office administration - The office staff need additional support. A shortage means we are constantly playing catch up rather than progressing and the workload for those in the office is significant.

- Teaching materials - we have limited stock and staff have to be very creative about activities planned for the children. All stock is low and some staff are buying their own resources for their lessons. One example of a change made several years ago to save money was to ask staff not to print or photocopy in colour where possible as black and white printing and copying is cheaper, but this affects the quality of learning materials for the children.
- SLT are under staffed and although this has been addressed with a temporary placement, the pressure on the existing SLT has been intense. All members of the SLT are working long hours to enable the School to function and move forward. It is not sustainable for their workload and wellbeing but also there is likely to be something missed or dropped because of the many demands on them.
- Provision - many areas particularly outdoors needs to be revamped. Currently it is a struggle to meet the requirements of the Foundation Phase with the provision on offer.
- School trips – The School can only ask for voluntary contributions towards the cost and the School has to cover the gap. More parents are no longer contributing and the School cannot afford the bill so no/very few trips that have a cost attached to them are taking place, meaning many lost opportunities for the children.

If we have to make further cuts, there will be a further significant impact to health and safety, learning and teaching and pupil and staff wellbeing.

A small rural Primary School

In this document, we aim to outline the impact of the consistently low funding allocation to the Vale of Glamorgan Local Authority by the Welsh Government. Whilst Llangan Primary School's 2022/23 budget shows that the school is one of only a handful of the 40 Vale schools to be achieving a surplus, we have had to make significant sacrifices in order to attain that surplus, which are detailed in the following.

At the time of the last Estyn inspection, in April 2019 (where the school was taken under Estyn Review), Llangan Primary was given four recommendations for improvement which the school has worked hard to complete (with sufficient progress being judged to draw the school out of Estyn Review in February, 2021). Whilst many of the required changes have taken place, the school has had to rely on the goodwill and volunteered time of the (previous and current) headteachers, teachers, support staff, parents and governors. The required levels of CPD, training and external input into the development of the school's provision have been extremely limited as cover was unaffordable. The school sacrificed two teaching assistants and a trainee teacher, at the end of 2021/2022, as it prepared for the financial constraints ahead. This, in turn, impacted on ALN interventions, KS2 class sizes and a lost opportunity to keep and develop a well-regarded trainee teacher. Consequently, Llangan Primary has been operating with a skeleton staffing structure, with the remaining teaching assistants assigned to support statemented children or carry-out interventions, and therefore there has been minimal general class support. The dire financial situation also informed and encouraged our decision to agree a two-year secondment for our deputy headteacher to another school, with implications for lost senior teacher expertise and strategic support for the newly appointed headteacher.

The development of learning resources, to support all pupil progress and challenge for the more able pupils, has been on hold over recent years due to financial constraints. For example, we would eagerly develop early reading through established and successful phonics schemes, such as Read Write Inc Phonics, and the mastery approach to maths through fluency-building and numeracy schemes, such as Number Sense and White Rose Maths, if the financial constraints would allow. Consequently, the staff and pupils of Llangan Primary are not benefiting from resources and schemes that schools in other local authorities receive automatically. This lack of investment in resources (and associated training) impacts on all pupils' academic attainment and progress. It also impacts on the highly stretched time of teachers, as they desperately prepare learning material to fill the gaps left by the unaffordable consistent, engaging and professionally-produced successful schemes.

At times within 2022/23, the school has been on the edge of providing a safe learning and working environment, as staff have been reallocated and stretched to thinly cover absence, often at very short notice. This not only impacts on staff security and wellbeing, but also on the clarity of their roles and responsibilities. Teaching assistants have, on average, sacrificed around 25 per cent of their intervention time this year, as they have been required to cover classes and duties. These interventions are invaluable in supporting the achievement and progress of ALN pupils, as well as the mental health of pupils who require support in developing their emotional literacy.

Our headteacher and senior leaders have covered classes, to avoid unaffordable supply cover costs. This has impacted on the school's strategic development, its ability to engage with external expertise, and in the implementation of a broad and balanced curriculum. Furthermore, senior staff have been unable to develop pupil and parent voice groups as required to ensure effective feedback

and the ability to inform future decision-making. Pupil voice groups do now include 'Digital Champions' and 'Health and Fit Committee' due to the dedication of the school's staff.

I hope that this outline of the 'chalkface' impacts of consistently low funding in the teaching and learning provision of Llangan Primary provokes action on the part of the Welsh Government, as these impacts are being felt across schools in the poorly-funded Vale of Glamorgan local authority. See Chart below showing how the Vale of Glamorgan local authority is underfunded compared to elsewhere in Wales (Source: Statistical Bulletin, Welsh Government).

A Secondary School

Actions already taken to pre-empt budget concerns:

- Senior staff member replaced in the wellbeing team, from Sep 22, a Full time teacher with a large TLR replaced by a non-teaching member of staff.
- Data manager – job not replaced, workload offset onto other staff with some pay increases. However, this has already caused some workload issues.
- Only additional cost of Data Manager leaving was to increase one of the site team from part time to full time to cover WG taking over some of Data Manager job roles.
- Assistant Headteacher in the structure, this person has not been in post for over 5 years, already stretching the leadership team beyond capacity.
- Music subject lead TLR reduced when teacher appointed in Sep 2021.
- English HOD TLR reduced when new Head of English was appointed in 2021.
- DT subject lead TLR removed
- No Associates to the SLT have been appointed this year due to cost and time needed to complete the role.
- TLR's for jobs in the last 3 years have been employed at the bottom or middle of the TLR range as opposed to the top of the range as was the case previously.
- Lead practitioner roles for English and Maths have not been replaced in the last 3 years.
- 3 U3 teachers have been moved on in the last 5 years. Art/ MFL and English.
- Canteen has been transferred out of school ownership since October 2022 due to the costs this had begun to impose on the school.
- Raided Whitmore/ Pencoedtre/ HMRC offices to get second hand furniture rather than buy new.
- As of August 2022, we had a staff to pupil ratio of 1/16.6. Based on current cuts, we will have a ratio of 1/17.9 from September 2023.

Actions being taken from April 2023:

- Full time Science teacher not having contract renewed for September 2023. This means less sets for Science in KS4 and no capacity for science interventions.
- 0.5 Maths teacher. She left at Christmas, we have to maintain her timetable for the academic year but will not be replaced in September. This will mean less sets for Maths in KS4 and no interventions.
- 0.5 general teacher left at Christmas. Part time teacher added one day to cover music lessons. Other days not covered from September. This has led to one subject form each option column being reduced for Year 10 in September 2023.
- 0.6 general teacher, PE, Skills and Welsh. This role is being removed from September. This means that RE and Welsh will have less sets in KS4 and no interventions.
- English have had to reduce the amount of sets in KS4 due to change of role for SMC and JO having to have more free time due to the ALN act, meaning interventions will also be removed.
- 2 TA's are retiring this summer. At this moment, although it will be at the detriment of the ALN needs of some of our pupils, they will not be replaced.
- 3 TA's are on temporary contracts; it is likely we will only keep 2 of them.
- 1 of the TA team has reduced hours from FT to 0.8 from March 23.
- TA hours total 170 this year, reducing to 125 in September.

- SLT TLR's – Assistant Head to leave August 31st. New role to be advertised on slightly lower scale with LB on a senior AHT scale. This will save £6k in year 1, £4k in yr 2, £2.5k in yr 3, cost neutral yr 4 and £2500 loss in year 5. Over the period it saves approx. £10k.
- Voluntary Redundancy – one member of staff has come forward.

Agenda Item 4.1

P-06-1209 Create a national list of all unpaid carers in Wales

This petition was submitted by Mike O'Brien, having collected a total of 77 signatures.

Text of Petition:

The Welsh government have said for a long time now that identifying unpaid carers is a difficult task, so this petition is to ask for the creation of a national carers register to make identifying unpaid carers easier.

Senedd Constituency and Region

- Vale Glamorgan
- South Wales Central

Julie Morgan AS/MS
Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JMSS/00504/23

Jack Sargeant MS
Chair - Petitions committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

7 September 2023

Dear Jack,

Thank you for your request to receive an update to my previous correspondence, dated 10 January 2023, regarding considerations of introducing a national register for unpaid carers.

My previous letter outlined work undertaken by officials to explore the viability of introducing a carers' register. It also clarified that it would not be possible for Welsh Government to access data held on individual carers by local authorities or health boards without securing the agreement of each individual to utilise their data for other purposes. This would be costly and time-consuming. Consequently, unpaid carers would be required to additionally sign up to a Welsh Government register. Local authorities, health boards and national carers' organisations would continue to hold their separate lists. Some people may not see the value in signing up to more than one list and a register generated in this way could not be used to collect current and accurate data on unpaid carers in Wales.

While the list could be used to disseminate information from Welsh Government to those signed up, we could not guarantee it would reach more carers than those already signed up to other existing data bases. The matter was discussed at the Ministerial Advisory group for Unpaid Carers on 16 March

Since this time, officials have compiled a list of the co-ordinators for all separate carers' lists held. Via this mechanism, we can reach all unpaid carers signed up to these lists.

We have also received information on year one costs to establish and maintain a national list from Digital Health Communities Wales. This would be between £100,000 and £237,000, depending on uptake and the level of security afforded to users. A major publicity/ awareness campaign would also be required to maximise the number of unpaid carers registering on the database, at further cost.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Julie.Morgan@llyw.cymru
Correspondence.Julie.Morgan@gov.wales

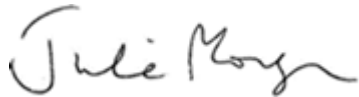
Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

You are aware of the significant financial pressures we are facing in the 2023-24 budget, and to continue preparations for the 2024-25 budget round. Funding was not yet identified for this project. Given the reduced utility of the register as initially envisaged, and the high levels of funding to establish and run it, it may be difficult to consider this a justifiable expense at this time. Officials have engaged with Carers Wales and Carers' Trust Wales to make them aware of this situation. There was acknowledgement that a register, as described, would not bring the added value anticipated and a view that other pressing needs of unpaid carers were of higher priority for their organisations.

A definitive decision has not yet been made as I wish to bring it back to the Ministerial Advisory Group on 25 September.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Julie Morgan'.

Julie Morgan AS/MS

Y Dirprwy Weinidog Gwasanaethau Cymdeithasol
Deputy Minister for Social Services

**P-06-1209 Create a national list of all unpaid carers in Wales, Correspondence –
Petitioner to Committee, 19.09.23**

Whilst I understand and appreciate that Welsh Government officials have undertaken to identify lists of unpaid carers that are held by local authorities, health boards and third sector organisations I still feel there is a need for a centralised list that is held by the Welsh Government alone. The past few years have shown that Welsh Government are unable to easily identify unpaid carers as was the experience during the initial roll-out of the COVID-19 vaccines. The lists that do exist are unable to be shared with Welsh Government due to GDPR regulations and not all organisations who do hold those lists are as willing to disseminate information from Welsh Government as others are.

One must wonder how much money was spent on identifying those lists and the key coordinators as well as how that money could have been better spent in the pursuit of funding the initial setup costs of a National Register of Unpaid Carers.

Both myself and a colleague have recently met with both the Deputy Minister and her advisor, Andy Pithouse, to discuss the creation of a national register and during those meetings we offered an alternative solution through collaboration working with Carers Card UK. The Welsh Government could purchase the carers cards in bulk and the admin team at Carers Card UK would help to facilitate and create a portal that could be used by Welsh Government to monitor uptake and information gained from such a scheme. Such a scheme rolled out across Wales would also give unpaid carers access to a UK wide discount scheme, much like the scheme offered to holders of the Blue Light Card. Welsh Government would also have to opportunity to add Wales specific discounts at both a national and local level.

I appreciate the financial pressures placed on the Welsh Government at the current time, but one of the commitments in the National Strategy for Unpaid Carers in Wales is to better identify unpaid carers across the country. Without the creation and promotion of a national register or some other such scheme I fail to see how the Welsh Government can hope to achieve a positive outcome to this commitment.

As an unpaid carer representative and through my connections made on social media and attending various meeting both online and in person, I have spoken with many other unpaid carers both locally and across Wales. All those I have connected with and spoken to can see the value in having a National Register of Unpaid Carers in Wales.

I am disappointed that Carers Wales and Carers Trust Wales appear to not be backing the creation of a National Register citing that other challenges faced by unpaid carers are more pressing. I feel that the creation of said register would aid help those organisations in their endeavours to support and assist unpaid carers and would also add value to any future funding bids they would wish to make in their pursuit to improve the lives of unpaid carers in Wales.

Agenda Item 4.2

P-06-1262 Welsh Government to hold a public inquiry into decisions taken by them before & during the pandemic

This petition was submitted by Anna-Louise Marsh-Rees, having collected a total of 2,116 signatures.

Text of Petition:

Many loved-ones acquired Covid-19 in hospitals & care homes in Wales. PPE was lacking, staff not tested unless symptomatic, ventilation poor, Covid patients put on non-Covid wards. Many sent home without being retested; spreading infection in the community & subsequently dying. Many had DNRs placed without consultation. Communication was poor or non-existent. Lessons most definitely have not been learnt. Decisions taken in Wales which affected the people of Wales should be scrutinised in Wales.

Additional Information:

As the First Minister has clearly pointed out throughout the pandemic, decisions regarding the Covid-19 rules in Wales have been made in Wales. He has been keen to highlight the often-significant differences of those rules between England and Wales.

A Wales -specific inquiry would provide an independent review to investigate if deaths in Wales could have been prevented.

The Welsh Government deserve to be properly scrutinised – not a footnote in a UK Government inquiry.

Senedd Constituency and Region

- Monmouth
- South Wales East

P-06-1262 Welsh Government to hold a public inquiry into decisions taken by them before & during the pandemic

Following first hearing in the UK Covid-19 Inquiry in June 2023 it has further demonstrated the need for a Wales specific public judge -led independent Covid inquiry,

Module 1 of the UK Covid Inquiry, which examined pandemic preparedness lasted six weeks, yet the focus on the Welsh Government was limited to just over 2 days. There were just 7 witnesses from Wales called providing just 8 hours of testimony from a total of 87 hours. This lopsided approach did not adequately scrutinise why the Welsh Government did not prepare for a pandemic.

Furthermore, the location of the committee in London poses significant barriers for Welsh bereaved families who are unable to easily travel there to participate.

In the First Minister, Mark Drakeford's letter to the sponsor for the UK Inquiry, Boris Johnson, dated 12 Nov 2021, he writes:

***Evidence hearings in Wales.** Public participation in Wales will only be effective if the inquiry has a significant presence and visibility in Wales throughout the duration of the inquiry. It will be essential that resources should be made available for testimony to be given in the Welsh language, at the request of Welsh-speaking participants.*

Of the 7 modules already announced only Module 2B will be located in Wales, with only 13 working days covering the Welsh Government response.

Module 3 examining healthcare, the most important module, is scheduled for 10 weeks only. Its scope is vast inc. Preparedness. Core decision-making and leadership within healthcare systems. Staffing levels and critical care capacity. The establishment and use of Nightingale hospitals and the use of private hospitals, 111, 999 and ambulance services. GP surgeries and hospitals and cross-sectional co-operation between services. Healthcare provision and treatment for patients with Covid-19. Healthcare systems' response to clinical trials and research during the pandemic. The allocation of staff and resources. The impact on those requiring care for reasons other than Covid-19. Quality of treatment for Covid-19 and non- Covid-19 patients, delays in treatment, waiting lists and people not seeking or receiving treatment. Palliative care. The discharge of patients from hospital. Decision-making about the nature of healthcare to be provided for patients with Covid-19, its escalation and the provision of cardiopulmonary resuscitation, including the use of do not attempt cardiopulmonary resuscitation instructions (DNACPRs).The impact of the pandemic on doctors, nurses and other healthcare staff, including on those in training and specific groups of healthcare workers (for example by reference to ethnic background). Availability of healthcare staff. The NHS surcharge for non-UK healthcare staff and the decision to remove the surcharge. Preventing the spread of Covid-19 within healthcare settings, including infection control, the adequacy of PPE and rules about visiting those in hospital. Communication with patients with Covid-19 and their loved ones about patients' condition and treatment, including discussions about DNACPRs. Deaths caused by the Covid-19 pandemic, in terms of the numbers, classification and recording of deaths, including the impact on specific groups of healthcare workers, for example by reference to ethnic background and geographical location. Shielding and the impact on the clinically vulnerable (including those referred to as "clinically extremely vulnerable"). Characterisation and identification of Post-Covid Condition (including the condition referred to as long Covid) and its diagnosis and treatment.

Module 3 is not even split by nation despite healthcare being fully devolved and each nation having their own system.

In England alone, there are 229 NHS Trusts and 43 Integrated Health Boards, 220 general acute hospitals, 826 community providers and 6,925 GP practices.

It will simply not be possible to cover even England in this time let alone scrutinise Wales and the other devolved nations.

The absence of Welsh experts or even experts that include Wales in their reports in the UK Inquiry further undermines its ability to comprehensively assess the Welsh context and provide meaningful insights.

The First Minister stressed he would only be in a UK Inquiry if it was in Wales, in Welsh and with Welsh experts yet that is not happening.

In stark contrast, Scotland has set an exemplary standard for devolved governments by establishing a separate Scottish Covid Inquiry that collaborates with the UK Covid Inquiry. This joint effort ensures there is no duplication and gaps and guarantees thorough scrutiny of Scotland's response.

For Wales, we demand more than a Senedd Special Purposes Covid Committee that operates behind closed doors and within the same political arena where Welsh decision making occurs. It is imperative that the Wales Covid inquiry is conducted independently and led by a judge, ensuring transparency, impartiality, and public trust. Additionally, the current committee's lack of enforcement powers, limited only to producing a report, fails to provide the necessary mechanisms for holding accountable those responsible for any shortcomings identified.

We continue to call for a Wales specific independent, judge-led public inquiry that incorporates the valuable lessons learned from Scotland's approach and prioritises meaningful participation of bereaved families in the proceedings. It is only through such a comprehensive and inclusive inquiry that we can hope to achieve justice, accountability, and the prevention of future tragedies.

=====

Regards

Agenda Item 4.3

P-06-1288 Deliver Magor and Undy Walkway Station, part of the Burns Delivery Programme, as a quick win

This petition was submitted by Paul Turner, having collected 297 signatures online and 250 on paper, making for a total of 547 signatures collected.

Text of Petition:

We urge the Welsh Government to expedite the opening of Magor and Undy Walkway Station, as a 'quick win' in the delivery of the lord Burns report. The station is needed now, with the population of Magor with Undy rapidly expanding and shortly becoming a town.

Magor Action Group on Rail (M.A.G.O.R.) has been campaigning for 10 years to restore a railway station to the communities of Magor and Undy. It has had massive community support and the full backing of local politicians in the County, Senedd and from our MP. This resulted in it being included in the Burns Report Recommendations and its inclusion in the Burns Delivery Programme. We believe this would be a 'quick win' because it is a technically simple and cost-effective element of the plan.

The full history of the campaign is available on our website – magorstation.co.uk.

Senedd Constituency and Region

- Newport East
- South Wales East



19th September 2023

Please find below an update from the MAGOR group -

- **Since the petition was debated on the 6th of February 2023. On the 14th February 2023, the Welsh Government cancelled the road building programme. This has meant that the integration of the public transport link with Severn Tunnel Junction has either been delayed or cancelled. Magor & Undy Walkway Station could link all modes of public transport at very little cost. This is because the bus route passes the station entrance. Therefore, there is not a need to build an expensive road link, just needs a couple of pavement bus stands.**
- **The design for Magor & Undy Walkway Station has been completed and will be consulted on in the autumn, although we have not seen the design as yet. We anticipate it will be a low-cost construction as it is not dependant on the upgrade of the relief lines.**
- **A statement of opinion supporting Magor & Undy Walkway Station as a quick win for Lord Burns Report. It was tabled by John Griffiths SM supported by Natasha Asghar SM, Peredur Owen Griffiths SM and Laura Anne Jones on 10th February 2023.**

Ted Hand and Paul Turner

MAGOR GROUP

Agenda Item 4.4

P-06-1348 Commission suitable NHS services in Wales for people with EDS or hypermobility spectrum disorders

This petition was submitted by Natasha Evans-Jones, having collected a total of 1,125 signatures.

Text of Petition:

Historically those showing signs of Ehlers-Danlos syndromes (EDS) or HSD have been referred to rheumatology departments. In 2021, they were directed to stop seeing these patients in favour of their diagnosis and management in primary care, which is not currently equipped for this role. A unique tertiary service in England has also closed to out of area patients. This situation has led to inequalities in access to healthcare for those with EDS and HSD in Wales resulting in unacceptable suffering.

Additional Information:

Ehlers-Danlos syndromes are genetic connective tissue disorders with body-wide symptoms which can be disabling, affecting all aspects of life. One type is life-threatening. Symptoms of most types include musculoskeletal problems, chronic pain and fatigue, gastrointestinal disturbance, fragile skin, pelvic and bladder problems, autonomic dysfunction and anxiety. Twelve of the 13 classified types can be diagnosed via genetic testing. There is no single test for the most common type (hEDS) or for the related hypermobility spectrum disorders (HSD) which makes diagnosis challenging. Together, hEDS and HSD are fairly common. A study in 2019 using data from Welsh hospitals and GP records found that 1 in 500 people are affected (Demmler et al, <https://bmjopen.bmj.com/content/9/11/e031365>).

The situation in Wales is causing suffering for those waiting for diagnosis, those on inappropriate treatment pathways, and their families.

Senedd Constituency and Region

- Vale of Clwyd
- North Wales



Eich cyf/Your ref P-06-1348
Ein cyf/Our ref EM/01941/23

Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

Government.Committee.Business@gov.wales

16 August 2023

Dear Jack,

Thank you for your further letter of 14 July on behalf of the Petitions Committee regarding services for people with Ehlers-Danlos syndrome (EDS) and hypermobility spectrum disorders (HSD).

General consultant specialists are available within every Welsh Health Board and those living with a rare condition will receive quality multidisciplinary care as close to home as possible. Most patients with EDS will be under the care of a rheumatologist, who will have expertise in the area. As EDS is usually multisystem, a Multi-Disciplinary Team approach is best practice.

WHSSC commissions the diagnosis of EDS in children suspected of having EDS. Whilst children can be referred for diagnostic assessment, management and treatment for the condition will be through local clinicians. The specialised diagnostic service only considers children with classical, vascular or rare types of EDS and the children must be referred by a hospital specialist.

For adults the usual pathway would be within the responsibility of the health board within rheumatology. For some patients the high level of expertise required to treat patients is only available at a few centres within the United Kingdom. If there is a possibility a person may have a rare type of EDS, GPs can refer to the local genetics service for an assessment. If further investigation is required, further referral to the EDS National Diagnostic Service is available.

The Rare Diseases Implementation Group (RDIG) is currently scoping the opportunity regarding a virtual health hub for those impacted with Rare Diseases. It will look to provide

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Eluned.Morgan@llyw.cymru
Correspondence.Eluned.Morgan@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

peer support and leadership opportunities, improve coordination of care and increase awareness of research studies.

RDIG are also supporting the SWAN clinic and the Paediatric Rare Disease MDT clinic in Cwm Taf Bro Morgannwg UHB, which aims to understand the impact of a named coordinator of care, amongst other objectives.

Welsh Government will work closely with the strategic clinical networks in the newly established NHS Wales Executive, to ensure we have the insight and support of networks to improve access to diagnosis and treatment for those with Rare Diseases, and in doing so increase awareness and training in these networks.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. E. Morgan'.

Eluned Morgan AS/MS

Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

P-06-1348 Commission suitable NHS services in Wales for people with EDS or hypermobility spectrum disorders, Correspondence – Petitioner to Committee, 18.09.23



Eich cyf/Your ref P-06-1348
Ein cyf/Our ref EM/01941/23

Natasha Evans-Jones
Lead engagement and community volunteer for Wales
Area coordinator for North Wales
Student social worker
Ehlers-Danlos Support UK

18 September 2023

Dear Eluned,

Thank you for your letter regarding our petition calling for the funding or commissioning of suitable services for those with hypermobile Ehlers-Danlos syndrome and hypermobility spectrum disorders (hEDS/HSD).

Within your letter you state that patients with hEDS/HSD should be under a local rheumatologist to help manage their care. Unfortunately, currently most health boards within Cymru decline all referrals for local rheumatology stating that they do not deal with hEDS/HSD. I have evidence of this including letters sent to our members who have been bounced back, and emails from rheumatologists stating this. It is best practice to refer to rheumatology to get diagnosis and support, but unfortunately for hundreds of patients with hEDS/HSD in Cymru, they are left with no care as rheumatologists are refusing to see them. Many of the patients with hEDS/HSD must pay themselves for private healthcare to gain any diagnosis or support, if they can afford it. If a patient needs support from a specialist service in England, then they must apply for individual patient funding. In my experience this is very rarely given, and often the application to these specialist centres needs support of local rheumatology, of which most patients are not able to access.

Within your last two letters you state that hEDS/HSD is classed as a rare disease so would be included under the Welsh rare disease awareness plan 2022. Demmler et al (2019) found that hEDS/HSD is around 1 in 500 in Cymru and therefore no longer classed as a rare disease. There are 13 types of EDS, 12 of those are classed as rare diseases. The rarer types are covered by genetic diagnosis services as they have a gene that can be tested. hEDS/HSD do not currently have a genetic test, so diagnosis would be through physical presentation.

Without access to local rheumatology many patients in Cymru are being let down by the NHS. We need to fund or commission specific services for people with hEDS/HSD.

Yours sincerely,

Natasha Evans-Jones (she/her)
Lead Engagement Volunteer and Area Co-ordinator

Agenda Item 5

P-06-1344 Moderate quality agricultural land (grade 3b) should be used for food security not solar farms, Correspondence – Petitioner to Committee, 18.09.23

Petition: P-06-1344 CAEVOD (Campaign Against East Vale Overdevelopment)

Dear Petitions Committee,

Thank you for considering this petition. The Welsh Minister's response (*included in italic print for ease of reference*) appears to be based on an incomplete assessment of Welsh Government policies and documents and as a result open to challenge. The following points are raised following considerable research by CAEVOD members although none are experts in this field.

1. *As the Minister responsible for determining DNS applications, neither I nor my officials can comment directly on any particular scheme.*

Comment:

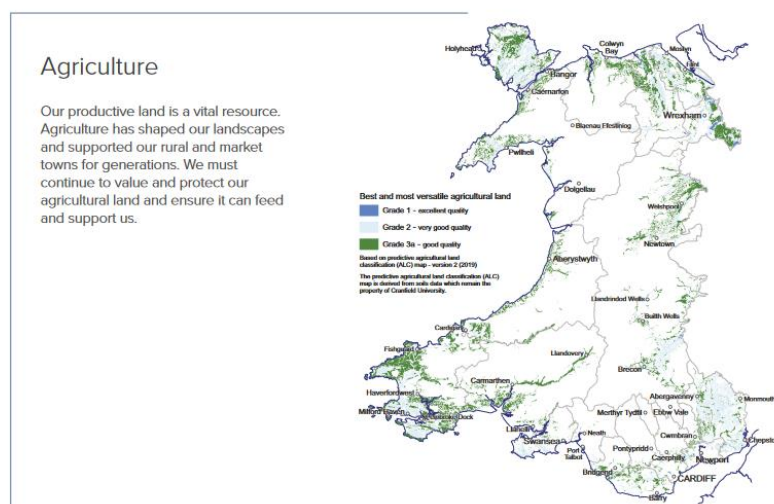
CAEVOD's petition is in response to researching several Welsh solar farm proposals listed on PEDW's website and concerns these proposals raise about the increasing use of agricultural land for solar development in Wales. There is no intention for this petition to be linked to any particular scheme.

2. *Future Wales: The National Plan 2040 in respect of high-quality agricultural land is: - 'Our productive land is a vital resource. Agriculture has shaped our landscapes and supported our rural and market towns for generations. We must continue to value and protect our agricultural land and ensure it can feed and support us'.*

Comment:

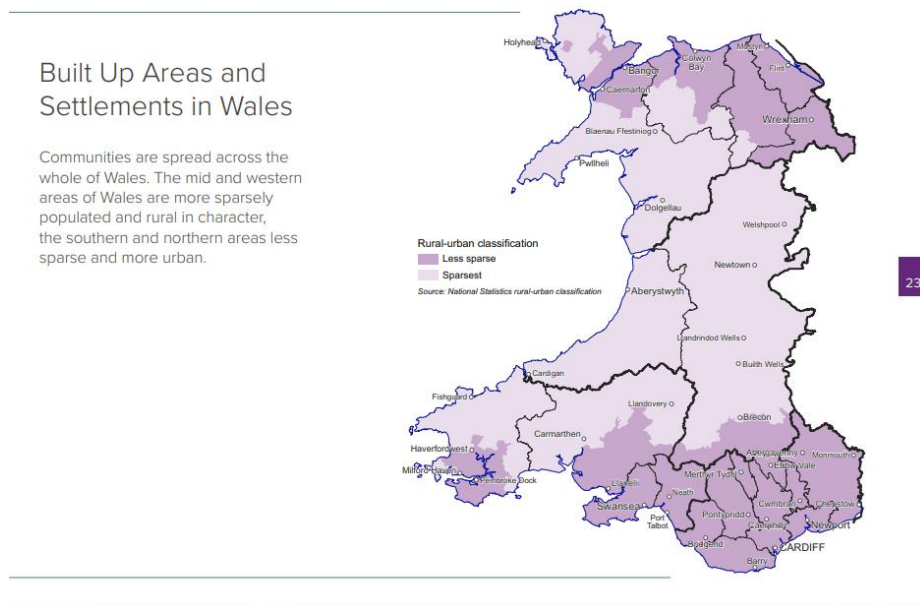
Given the rare and scattered nature of Best & Most Versatile (BMV) agricultural land illustrated in Figure 1 below, is it all available for food production?

Figure 1: PDF page 27 Future Wales: The National Plan 2040.



-
- BMV agricultural land (especially grade 3a) is often found within areas of 3b land. Retention of this BMV land for agricultural use is only considered if the amount of BMV land within the solar farm proposal 'exceeds the 20 hectares threshold over which the development of BMV agricultural land for alternative uses is considered to be nationally significant' (p35 PEDW website Inspector's Report 2021-08-10 DNS/3245056). In other words, if less than 20 hectares BMV land will be covered by a solar farm proposal it is likely to be lost to this development.
- When comparing Figure 1 with Figure 2 (Built Up Areas & Settlements in Wales) below, a significant amount of BMV agricultural land falls within these urban/semi-urban areas making it vulnerable to loss for housing and other urban development.

Figure 2: PDF page23 Future Wales: The National Plan 2040



3. *BMV agricultural land accounts for 10-15% of land in Wales. The 10-15% range reflects some uncertainty in the Predictive Agricultural Land Classification Map. Certain site-specific limitations were not included in the production of the Map due to a lack of available data. These include frost risk, agricultural flood risk, pattern limitations, micro-relief limitations and chemical limitations. The severity of these limitations may limit some areas currently graded as predictive BMV agricultural land.*

This statement suggests that the % of actual BMV agricultural land is likely to be nearer 10% than 15%. Is this really sufficient to 'feed and support us'?

- How much land will be needed to 'ensure it can feed and support us'? No information is given.
- This statement drawn from p12 of the following Welsh Government publication https://www.gov.wales/sites/default/files/publications/2022-08/review-welsh-soil-evidence_0.pdf, omits the bullet point that follows it: 'Only 32% of total BMV land (296,897 ha) is used to grow crops (including arable crops, uncropped land, and high value horticultural products; 95,500 ha), the majority of BMV land is under grassland. Most arable production (ca. 60%) occurs in ALC land grades 3a and 3b, with very little occurring in the grade extremes. **ALC subgrade 3a represents the core BMV resource. Due to the large extent of agricultural production on subgrade 3b land, future review of the ALC and policy might include or split the 3b subgrade.**' (emphasis added).

- ALC subgrade 3b accounts for an additional c.23% of agricultural land in Wales..... 3b is defined as, “land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year”.

This statement clearly illustrates that 3b land is an important food resource and is capable of growing a wide range of crops. Even if productivity may be less than 3a for some crops it is still widely used by farmers to grow a range of commercially viable crops suitable to feed humans and animals. Its inclusion in with the BMV figures above still only gives a total of 33-38% of the land area in Wales capable of food production – even if all this land was actually used to produce food, is this figure really enough to feed the Welsh population and significantly reduce our food miles carbon footprint?

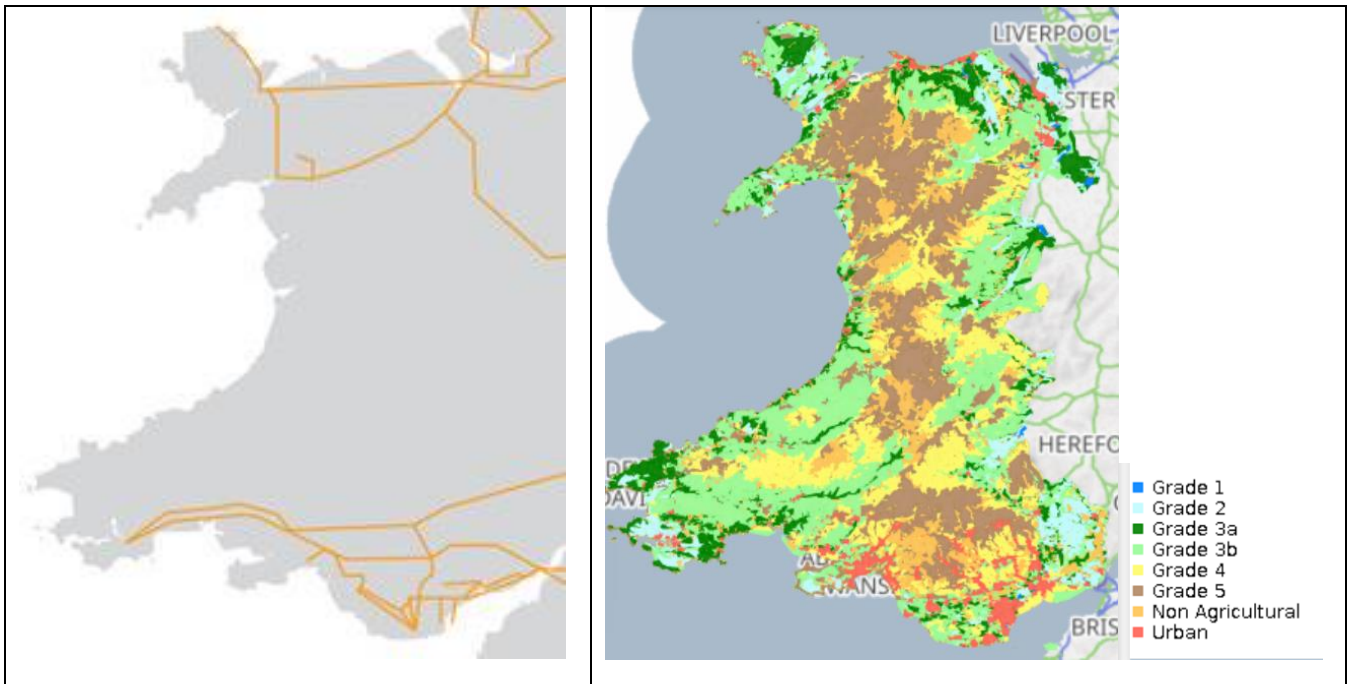
4. The table below illustrated the latest available data on the quality of agricultural land used for solar PV sites in Wales by area (hectares). **This covers the period 2012-2020 and excludes DNS permissions.** (emphasis added).

Grade 1		Grade 4	
Area	%	Area	%
0	0	254.8	17
Grade 2		Grade 5	
Area	%	Area	%
268.1	18	116.3	8
S'grade 3a		Non-agri	
Area	%	Area	%
202.4	13	15.6	1
S'grade 3b		Urban	
Area	%	Area	%
660.8	43	3	0

Comment:

From this data it can be seen that:

- the total area covered by solar panels up to 2020 (excluding DNS permissions i.e. solar farms that are larger than 10MW) is 1521 hectares. CPRW (2023 data) calculates the additional land covered by existing and proposed DNS solar farms as at least 2652 hectares **so the total land area covered by solar panels will be at least 4173 hectares**, nearly 3x more land than the Welsh Minister’s data suggests. <https://cprw.org.uk/wp-content/uploads/2023/07/Developments-of-National-Significance-RWAS-V1.7a-20230711.pdf>
- Despite 3b land being capable of commercially profitable food production it is being favoured for solar PV sites over less useful lower grade land (3b=43%, lower grades=26%). This overuse of 3b land is likely to be much higher once DNS solar farms proposals are taken into account. These developments need to link up to main National Grid routes at points that are easily accessible and the land is not steep for construction vehicles, which tends to be on flatter higher-grade land (see National Grid network & ALC predicted grades maps below).



National Grid network

ALC predicted grades

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

https://datamap.gov.wales/maps/new?layer=inspire-wg:wg_predictive_alc2#/

5. The ALC grades definitions are published in the 'Revised guidelines and criteria for grading the quality of agricultural land' (MAFF 1988). The Welsh Government continues to ensure the Agricultural Land Classification System is fit for purpose.

Subgrade 3b is defined as, "land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year".

BMV land often contains lighter and easy to work soils, it requires fewer "passes" by agricultural machinery to establish seedbed. The reduction in the amount of time machinery spends on the land helps reduce fuel, labour, and maintenance costs. It also reduces the potential for damage to soil organic matter. Horticultural and root crops grown on BMV land can also be harvested in a cleaner condition reducing loss of soil, water usage and crop wastage.

Comment:

The Agricultural Land Classification (ALC) grading system which is being used to determine which land can be used for solar farms is based on a 1988 land classification scheme. However, the 1985 ALC map for England & Wales which ran alongside grading system is now considered obsolete and has been replaced by the Predictive Agricultural Land Classification Map 2 for Wales 2017.

Why has the ALC grading system itself not also been updated?

The following document (listed on page 3 of the Welsh Minister's response) recommends that the factors that determine the ALC grades should be reviewed

<https://www.gov.wales/sites/default/files/publications/2022-11/agricultural-land-classification-technical-review-scoping-study.pdf>.

PDF page 10 'Given that the guidelines were published over 30 years ago, it is important that the threshold limits for establishing grading are reviewed and updated to ensure they are valid and appropriate for the future. In addition, major advances in technology (e.g. GIS or remote sensing) since 1988 may provide methods for assessing criteria that were not previously possible'.

PDF page 73 'many of these changes are considered important for the ALC to reflect current climatic conditions and continue to be of relevance in planning decisions.'

PDF page 88 'The ALC system was designed to identify land that is best suited to productive agriculture. The system does not consider the sustainability of production or the wider environmental or amenity value of any land.'

PDF page 90 'It is very likely that the overall ALC grade of some sites will change, particularly those that are close to the boundary between two Grades for a particular limitation.'

Surely this suggests that relying on the current fine distinction between grade 3a and 3b land in determining which land should be retained for food production and which can be used for solar is a mistake?

Why is other agricultural information not being taken into account in this DNS decision for example: the current & historical agricultural use; land management practices that enhance the quality and ease of working of 3b land increasing its productivity to grow a wider range of human and animal crops; the location of subsidised crops held by Rural Payments Wales?

Even the aforementioned report **PDF page 88** advises 'Review the potential benefits of expanding the ALC guidance to include additional reference crops'.

The Land Quality Advisory Service (LQAS) assesses soil survey data provided by developers and carries out further investigation if deemed necessary. Why does the Developments of National Significance process not make more use of the LQAS to oversee the planning and performance of developers' soil surveys including site visits to confirm the accuracy of their land grading first hand? Discrepancies do occur, for example Scruton Solar Farm, North Yorkshire, the developer's survey graded the agricultural land as 3b but the subsequent independent survey graded it as 2.

The phrase subgrade 3b suggests that this land is of much poorer quality which is not necessarily the case. The 1988 land grade 3 is now subdivided into two grades, subgrade 3a and subgrade 3b. LQAS have advised CAEVOD that the cut-off point between the physical characteristics of these two grades can be quite fine.

6. *Non-BMV land tends to be made up of heavier wetter soils and those in colder wetter climatic zones which limit their workability and cropping potential.*

Comment:

Climate is changing. Within the lifespan of current Development of National Significance proposals, Wales is expected to become warmer and rain patterns change. This will alter some of the physical characteristics of the soil. BMV agricultural land may no longer be able to realise its cropping potential as the climate becomes warmer with longer dryer spells in the summer stunting crop growth. As a result of this surely there could be an increased need non-BMV land with its ability to hold onto water to make up for this shortfall in food production?

This likely loss of BMV land is made at several points in the report

<https://www.gov.wales/sites/default/files/publications/2022-11/agricultural-land-classification-technical-review-scoping-study.pdf>. For example, **PDF page 90** 'In comparison with the original data Keay (2020) reported that under the 2020 medium scenario the proportion of land in ALC Grades 1, 2 and 3a decreased whilst the proportion of land in Grades 3b, 4 and 5 increased.'

7. *Over the summer, Welsh Government will publish an evidence review into 'The impact of solar photovoltaic (PV) sites on agricultural soils and land quality,' Report Code: SPEP2021-22/03.*

Comment:

Developers describe current solar farm proposals as temporary structures with the land being returned to its previous agricultural use after 40 years. However, the following statements suggest that the actual long-term impacts of solar farm development on agricultural land are still not fully understood. Following publication of this document why is the Welsh Government not initiating an immediate moratorium on all solar farm development?

PDF page 8 (Literature Review): 'There are few studies of solar PV sites and their impact on agricultural land and soils.'

PDF page 15 'There is limited evidence specifically relating to solar PV sites to confirm the benefits to soil health.'

PDF page 15 'Soil compaction can vary from short term and very low impact to irreversible. The assessment of the impact on agricultural land quality was demonstrated and that in wetter areas there is loss of BMV agricultural land and in slightly drier parts of England and Wales there is generally loss of versatility of the BMV agricultural land.'

PDF pages 13-15 provides an insight into the destructive impact on the soil structure of installing and subsequent removal of huge numbers of solar panels (whether on long metal poles or concrete bases) and deep trenching miles of cables on agricultural land. Further, the Inspector's Report DNS/3245065 acknowledges that this impact results in a permanent change in land use due to the very real difficulties in restoring the soil structure so that it can be returned to its original agricultural use.

PDF page 21/22 (Roundtable Discussion) 'Risks posed by solar PV sites to soils and land: too much trenching, leaching of toxic material from batteries, introduction of concrete to site, ... lack of understanding about soils best practice amongst developers, environmental

best practice guidelines are currently focused on biodiversity only, inadequate soils management planning, inadequate decommissioning statements may result in failure to return land to pre-development condition.'

Alarminglly the following statement illustrates the clear loss of BMV despite policies to preserve it.

PDF page 23 'The report on Solar PV Sites in Wales for Work Package 2b (10/10/2022) did include an ALC analysis of operational sites in Wales and the finding was that 31% of land used is BMV.' ...'However, this analysis was of operational sites and was based on the June 2021 BEIS Renewable Energy Planning Database.'

This review raises further concerns:

Inaccurate information - **PDF page 12** 'The BEIS Renewables Database is described as being 'as accurate and comprehensive a snapshot as possible of projects'. 'During the review, several sites were identified, which were not included in the BEIS Renewables Database.'

Increased loss of agricultural land - **PDF page 10** 'The data shows that there is a significant increase from 2018 in projects with a generating capacity close to 50MW (BEIS Renewable Energy Planning Database June 2021). For projects close to 50MW each development typically requires a land area of 60-80 ha. For larger projects with a generating capacity of 350MW the land area required is about 800ha.'

Lack of current knowledge - **PDF page 28** (Recommendations for Future Work) 'Analysis of ALC Grade and BMV land take for developments that have been constructed or been awarded planning permission since the date of those visible on the satellite images available during the Work Package 2b study in June 2021' and 'The impact of re-powering solar PV developments beyond a typical 40-year period on the soil and land.'

The following document

<https://publications.parliament.uk/pa/cm5802/cmselect/cmwelaf/607/report.html> (PDF page 10) states 'Climate change is already having a clear impact on farming.... Wetter weather will increase challenges to livestock production with increased flooding of fields potentially reducing the crop production used to supply bedding and feed. We are concerned that a reduction in yield, as a result of environmental factors, could reduce the viability of farms and, in turn, could have negative consequences for the cultural, economic and social significance of family farms in Wales.'

The average agricultural land holding for farms in Wales is 48ha

<https://senedd.wales/research%20documents/16-053-farming-sector-in-wales/16-053-web-english2.pdf> . The advent of 50MW solar developments typically of 60-80ha (stated above) will clearly tie up large swathes of agricultural land and the loss of entire farms in one generation seems inevitable. How does this align with *Future Wales: The National Plan 2040 in respect of high-quality agricultural land is: -'Our productive land is a vital resource. Agriculture has shaped our landscapes and supported our rural and market towns for generations. We must continue to value and protect our agricultural land and ensure it can feed and support us'?*

A lot of work has clearly gone into the above document however it is disappointing to see the repetition of often touted mantras that are inaccurate at best and in some cases clearly wrong.. for example:

PDF page 9 ‘Developers identify geographical areas of interest, either because it is known that there is spare capacity on the grid or the area has a high solar irradiation. Using a combination of desk-top and on-site searches, land which is free of development constraint is identified..... Following the identification of constraint free land and interested landowners further steps are undertaken.’

Through reading the environmental statements of many large solar development proposals in Wales and England it is clear that development constraints are not seen as red lines but more as hurdles that developers seek to minimise so they can be discounted. For example, Local Planning Authority landscape designations both to protect certain landscapes and identify solar search areas are often ignored.

PDF page 11 ‘Grass on the site is usually grazed by sheep.’

This statement is frequently cited by solar farm developers, yet this document fails to provide any supporting evidence. In reality sheep are rarely seen grazing on solar farms. Why is this? It certainly sounds a good idea and some studies show it to be beneficial e.g.

https://files.bregroup.com/solar/NSC_Guid_Agricultural-good-practice-for-SFs_0914.pdf

but...there is no contractual requirement for this to happen, sheep are fussy eaters and do not graze the sward uniformly, it is simply quicker and cheaper to employ a contractor to keep the grass down by cutting with a machine.

It is disappointing that this document has not gone further to consider whether sufficient evidence exists to support developers claims that solar development actually improves soil diversity and biodiversity (which favour crop production and the environment). If these improvements are correct they would be directly related to the management of the land, and as with grazing sheep, must become a contractual obligation to ensure they happen.

8. *Future Wales policies 17 and 18 set out the Welsh Government’s policies for renewable and low carbon energy development, including the key criteria for the determination of DNS. These key criteria ensure that applications for DNS are rigorously assessed so that communities, designated areas, landscapes and natural resources are protected from unacceptable adverse impacts. Policy 18 also requires consideration of the cumulative impacts of existing and consented renewable energy schemes where this is appropriate as well as the provision for ‘...effective restoration’.*

Comment:

CPRW has recently stated that the DNS system is not fit for purpose.

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUK EwjUya2m76mBAxUwWUEAHeYaAK4QFnoECBAQAQ&url=https%3A%2F%2Fcprw.org.uk%2Fwelsh-government-planning-system-not-fit-for-purpose%2F&usg=AOvVaw1IQEtBEX-R1c20j450TCxU&opi=89978449> .

From our research of solar farm proposals there is far too much reliance on the developer identifying suitable areas for solar development – why is the Welsh Government not doing this? Developers are also asked to provide information about their perceptions of unacceptable adverse impacts, cumulative effects and plans for effective restoration. The DNS process provides no definitions or examples for such criteria instead these definitions appear to be decided by the Inspector after submission on a case-by-case basis. This is not helpful for either the developers investing heavily in

their proposals or the communities left wondering for months/years what is going to happen on their doorstep.

We would like to draw the committee's attention to our second petition 'Improve the quality of information used in Developments of National Significance' which unfortunately did not gain sufficient signatures for separate consideration. Our research has found that apart from ALC grading there are few independent checks on the information developers provide to back up their assertions and no checks at all on the developer's credentials and previous record to turn their plans into reality.

9. *I can confirm that there are no plans to review the policy on Best and Most Versatile (BMV) agricultural land to include Subgrade 3b land.*

Comment:

The comments above illustrate that the Welsh Minister's response to this petition is not consistent with Welsh Government Policy - *Future Wales: The National Plan 2040* 'We must continue to value and protect our agricultural land and ensure it can feed and support us'. The response has failed to address:

- the ongoing loss of BMV land (despite PPW's approach to avoid the development of BMV land if alternatives exist and the Welsh Minister's reiteration of the protection of this finite resource to Chief Planning Officers in March 2021)
- this rate of loss is likely to increase significantly because to be commercially viable, solar farm proposals are becoming significantly larger and more frequent close to existing grid connections which often cross more favourably graded agricultural land.
- PPW's approach to avoid the development of BMV land is further increasing the loss of 3b land
- 3b land is commonly used by farmers in Wales to grow a wide range of crops for human and animal consumption. Its preservation for this use makes sense to future-proof our food supply particularly in response to climate change.

Further, the Welsh Minister's response ignores much of the information in the guidance it quotes; selecting points that support its argument rather than making a more balanced assessment. The most recent Welsh Government publication referred to in point 7 highlights just how little is known about the long-term effects of solar development on the agricultural capability of the land – surely this emphasises the need for a much more cautious approach when considering solar development on any agricultural land?

In summary, to meet the Future Wales 2040 commitment that agricultural land in Wales can '*feed and support us*' it would be prudent at the very least for the Welsh Minister to exclude all grade 3a and 3b land from solar development. It is hoped that the Petitions Committee will recognise the ongoing and inevitable further loss of productive agricultural land and will go much further by recommending to the Welsh Minister that:

- solar farms should only be located on brownfield sites, and solar panels should only be on building roofs. If agricultural land has to be used for solar development, then it should be land that is graded 4 & 5, free from planning constraints and not currently used to feed livestock.
- a moratorium on all solar development should be brought into effect immediately until the amount and location of land to '*feed and support us*' has been determined by Welsh Government to meet this Future Wales 2040 commitment.

Thankyou.