



A report on education services in

Monmouthshire County Council
County Hall
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Usk
Monmouthshire
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Date of inspection: February 2020

by

Estyn, Her Majesty's Inspectorate for Education and Training in Wales

About Monmouthshire County Council

Monmouthshire County Council is located in the east of Wales and has a total population of just over 94,000 people. The local authority maintains four secondary schools, 30 primary schools, one special school and one pupil referral unit. There are 12 maintained nurseries and 25 non-maintained nurseries in the authority.

The Chief Executive was appointed in 2009. The Chief Officer, Children and Young People, took up his post in 2017. The council leader has been in post since 2008 and the Cabinet Member for Children and Young People took up his post in 2017. The local authority was last inspected in November 2012.

Monmouthshire is one of the five local authorities in the EAS regional consortium for school improvement.

In 2019-2020, the Council's net education budget is approximately £58 million. The delegated school budget per pupil is £4,746 per pupil, which is 19th highest of all local authorities in Wales.

Inspectors take account of a wide range of information about the local population when evaluating outcomes and the quality of education services. They consider this information alongside information about the national population. Some of the most useful information about children and young people in Monmouthshire is noted below:

- Over a three year average, 10.9% of pupils aged five to fifteen are eligible for free school meals, lower than the Wales average of 17.8%
- 1.8% of pupils aged five and over are fluent in Welsh, which is lower than the Wales average of 16.2%
- 6.7% of pupils aged five and over are from ethnic minorities, below the Wales average of 12.0%
- 17.3% of pupils have special educational needs, lower than the Wales average of 22.2%
- 98 children per 10,000 were looked after by the local authority in 2019, which is slightly lower than the Wales average of 109 children per 10,000

Summary

Leaders provide a clear vision and a strong focus on ensuring 'the best possible start in life' for learners. Their high expectations and a commitment to strong partnership working have contributed to a good track record of improvement. In particular, they have strengthened the challenge and support to schools and developed robust and exemplar safeguarding procedures.

Although no school in the authority has received an excellent judgement for standards from our inspections over last three years, outcomes for pupils at the authority are generally good. Standards of wellbeing are strong overall and attendance is also good in most schools. However, the performance of pupils eligible for free school meals is generally lower than that of the same group of pupils across Wales.

There is good provision to support the needs of young people in the authority. The Youth Service provides a range of worthwhile activities, and beneficial support for vulnerable young people. There is a strong commitment by leaders to supporting young people's wellbeing through its youth support services.

There is also a strong commitment to further improve provision and outcomes for pupils with special educational needs (SEN), and a number of reviews over recent years have improved the authority's ability to meet pupils' needs. However, the authority's evaluation of SEN services is inconsistent, which hinders their ability to plan for improvement.

Generally, the authority has clear and consistent self-evaluation processes, but evaluations are not always diagnostic enough and often lack depth in their analysis. Officers and leaders do not maximise the use of the information gleaned from the evaluation process to inform improvement planning effectively enough.

Recommendations

- R1 Improve outcomes for pupils eligible for free school meals
- R2 Further strengthen the focus on increasing the number of pupils achieving excellent standards
- R3 Articulate a clear strategy for SEN provision
- R4 Strengthen the use of information gathered through self-evaluation to better inform improvement planning

What happens next

Following the publication of the inspection report, the local authority should update its plans to address the recommendations and to take account of shortcomings identified through the inspection process.

Estyn will invite the provider to prepare a case study on its work in relation to safeguarding, for dissemination on Estyn's website.

Main findings

Outcomes

Overall, pupils in Monmouthshire make good progress during their time in statutory education.

Over the last three years, Estyn has inspected two of the four secondary schools and 11 primary schools in the authority. Estyn judged that standards were good in both of the secondary schools and the proportion of primary schools judged as good is around the average for Wales. During this period, no school received an excellent judgement for standards.

Standards at the end of key stage 4 in three of the four secondary schools have generally been in line or above expectations over the last three years, although in one of these secondary schools performance shows a declining trend over this period. In one secondary school, performance has generally been below expectations.

Our evidence from school inspections shows that many pupils with special educational needs make good progress from their starting points. Pupils in learning support resource bases make at least good progress and pupils in the pupil referral unit (PRU) make suitable progress. The performance of pupils eligible for free school meals is generally lower than that of the same group of pupils across Wales. Overall, vulnerable pupils make good progress in their learning in primary schools, including pupils with English as an additional language and looked after children. The progress that these pupils make is stronger in the authority's primary schools than it is in secondary schools.

Overall, pupils' standards of wellbeing in Monmouthshire are strong. Generally, pupils feel safe in schools and settings and access a wide range of support to develop as healthy, confident individuals that contribute well as valued members of their community. Outcomes from our inspection reports in non-maintained settings and primary schools show that most pupils' wellbeing in these providers is good, and that pupils feel safe and enjoy learning. In the two secondary schools inspected and the pupil referral unit, wellbeing and attitudes to learning have been judged to be adequate and in need of improvement. In these providers, many pupils feel safe. However, in a few instances a minority of pupils lack concentration and disrupt the learning of others.

Over the last three years, the proportion of Year 11 leavers known not to be in education, employment or training (NEET) has remained low and is generally in line with the average for Wales.

Participation rates in extra-curricular activity such as sport are strong. Young people use the youth support services well to develop their aspirations, self-esteem and social skills. These services support young people well to gain accredited outcomes and to develop their leadership skills, such as when a group of young people planned and arranged the two-day 'diversifest' to promote and celebrate diversity.

Young people have beneficial opportunities to contribute to decisions about issues that affect them and the local authority takes good account of their views. For example, the young carer participation group has worked effectively with the authority to promote equality of opportunity through developing a policy where all young carers that apply to work in the authority will have a guaranteed interview.

Pupils who require support to improve their mental and emotional wellbeing benefit from the valuable strategies for support that the authority provides. These include targeted youth work and counselling services. The authority's analysis shows that pupils who have taken part in counselling sessions during the past three years have improved their emotional wellbeing.

Overall, pupils' attendance rates are strong. Attendance in secondary schools is a positive feature and all four secondary schools' attendance rates have been broadly in line or above expectations for the past three years. Rates of persistent absence in both primary and secondary schools are lower than national averages. However, the rate of persistent absence has increased in a few primary schools and one secondary school over the past three years.

The rate of permanent exclusions has been consistently low over the past three years. However, the rate of fixed term exclusions for five days or less shows an increasing trend over the same time period.

Education services

Under Inspection Area 2, Estyn sets local inspection questions that are relevant to each local authority. Local inspection questions focus on education services that relate to the local authority's current strategic priorities or result from information that Estyn has about education services in the local authority.

How effectively does the local authority work with the regional school improvement service in order to support, challenge, monitor and intervene in schools?

Local authority officers and the regional school improvement service (EAS) have a sound understanding of the needs of schools in Monmouthshire. They work together effectively to provide good quality support to schools. As a result, there has been an overall improvement in many schools in recent years. The impact of support has been stronger in primary schools than the secondary sector.

Increasingly, the authority works well with the EAS to challenge school leaders and governors to raise their expectations around the quality of teaching and the standards achieved by pupils. There is a common understanding among local authority officers, schools and the EAS that expectations have been too low in the past and recognition of the need to also focus improvement work on achieving excellence.

Numerous established points of contact between the local authority and the EAS enable clear and frank lines of communication that support school improvement effectively. For example, monthly quality assurance meetings ensure that support and intervention for schools target their specific needs well.

The local authority and EAS work together effectively to monitor the progress of schools. Where schools are causing concern, the local authority works well in partnership with the EAS to intervene through additional support and intervention. For example, the authority uses warning notices and its statutory powers very effectively to address specific issues around school performance. Half-termly schools causing concern meetings direct this work successfully. Overall, intervention is timely and effective, often resulting in strong improvements. The EAS supports this work well through the work of challenge advisers and by identifying relevant additional support.

The local authority and EAS tailor professional learning opportunities to the specific needs of schools well. For example, each school has a professional learning lead that works with the school's challenge adviser to construct a plan that helps address the developmental needs of staff, the school's improvement priorities and the emerging requirements of the new curriculum.

The local authority has been particularly effective in working with schools and the EAS to address specific leadership issues as they arise. They have a good understanding of the importance of securing high-quality senior leadership appointments and work well to attract strong candidates from within the local authority, the region and further afield.

How well does Monmouthshire identify and support children and young people with SEN to help them achieve better outcomes?

Over time, local authority officers have established worthwhile and effective relationships with partner agencies and schools. They know their areas of responsibility well and share a passion and commitment to further improve provision and outcomes for pupils with special educational needs (SEN). As result, a number of appropriate actions have been taken to improve the identification and provision for pupils with SEN.

The authority provides schools with clear guidance in relation to the identification of, and support available for, pupils with SEN. This guidance very usefully outlines the role of the school and the local authority in supporting SEN pupils and the procedures to be followed as part the graduated response in meeting their needs. The authority meets its statutory responsibilities for children in non-maintained settings. It has strengthened the advice, support and guidance it provides to these settings. Lead officers work well with colleagues and parents of children in the early years. Transition arrangements have been strengthened and are valued by settings, schools and parents. Despite this approach being relatively new, the authority has done a small scale evaluation of the positive impact of this work.

The authority has carried out a number of reviews of its inclusion services over recent years. These have resulted in amendments to existing provision and the establishment of new provision for pupils with a range of SEN. As a result of these improvements, the authority is generally better placed to meet the needs of these pupils.

The authority has well-established arrangements in place with all schools to discuss their provision and monitor the progress that pupils make. Local authority officers

meet with school leaders annually. Discussions include useful reflection on strategies that have worked well and those that have been less successful. The authority is beginning to develop a growing body of evidence around effective practice for supporting pupils with SEN. It is making appropriate use of this to advise schools on approaches to use and is sharing information on strategies with colleagues in the region. The Chief Officer, Children and Young People, has recently introduced a quality and assurance framework that covers all aspects of schools' work. This too is beginning to be used to highlight strengths and areas for development in schools' work around SEN.

The authority tracks the progress and attainment of pupils with statements of special educational needs, including those pupils in out of county schools, well. It also collects data for all pupils by SEN type, for example those with autism, learning and behavioural difficulties. However, it does not use this information well enough when it reports to different audiences, including senior officers and elected members.

The local authority has well-established and valuable links with other authorities in the region. These links have been used effectively to prepare schools, other settings and additional learning needs co-ordinators for the new additional learning needs (ALN) legislation. The local authority website provides a useful overview of the SEN process, including how to access independent support. However, there is limited range of information for parents in relation to the SEN services that the local authority provide and how to access them.

Despite improvements in permanent and longer fixed-term exclusion, the rate of shortterm exclusions for pupils with SEN is too high. The local authority cannot reassure itself that schools are making appropriate adjustments for pupils with SEN.

During the 2018-2019 academic year, the local authority consulted, with a small group of school professionals, on an ALN/SEN strategy for the authority. The draft strategy usefully outlines key principles but lacks detail on key actions to be taken, resource implications and timelines.

Overall, the local authority's approach to evaluating the range of SEN services is inconsistent. It does not capture well enough strengths and areas for improvement, and this hinders their ability to plan for improvement.

How successful is the local authority at ensuring that pupils' eligible for free school meals make good progress in their learning?

The performance of pupils eligible for free school meals in the authority does not compare well with that of the same group of pupils across Wales. Senior leaders have identified the need to improve outcomes for this group of pupils and this aspiration is shared by officers, elected members and school leaders across the authority. Local authority officers have a clear commitment to address this as a priority and to bring about improvements in the wellbeing and academic achievement of pupils eligible for free school meals.

The EAS regional school improvement service's Wellbeing and Equity Strategy informs the work of the challenge advisers in relation to improving the outcomes of learners eligible for free school meals. Challenge advisers provide helpful advice

and guidance to schools about the most effective ways of using the pupil development grant and they monitor how well schools apply this funding. Recently, challenge advisers have improved the first-hand evidence that they collect about the standards that pupils eligible for free school meals achieve. For example, they carried out a scrutiny of pupils' work, with a focus on monitoring how well this group of pupils are doing and identifying how teachers can help them to improve.

Officers are currently developing a strategy to provide a bespoke local authority approach to improving the performance and attendance of pupils eligible for free school meals. This strategy links well to the objectives of the Corporate Business Plan and to the regional school improvement service's strategy. It outlines the support available to schools from the authority and its partners to improve provision and outcomes for this group of pupils. However, the strategy does not focus well enough on specific activities relevant to individual schools or groups of pupils. It is not clear about the desired improvements in pupils' attainment or how officers will measure these improvements.

The early years' team work well together to help to mitigate the impact of poverty for young children across Monmouthshire to ensure that they have the best possible start in life. The team provides support for the families of vulnerable children across the authority. Flying Start officers focus well on developing children's early language skills and use a range of assessments and interventions to develop and improve young children's speaking skills. Staff at the Acorn Project provide valuable advice and guidance to parents to help them to support their children's social and emotional development as well as their learning needs. Parents can access structured group programmes, for example to learn about nutrition alongside their child or more bespoke support such as toilet training and baby care. The early years' lead officer provides good support for non-maintained settings, including advice and guidance to staff on the best use of the early years development grant. Settings make good use of this funding to support children and families. This work is a valuable part of the local authority's aim to ensure that young children are able to make positive transitions into school.

How well does the youth service support the needs of young people, particularly those who are vulnerable?

The authority recognises the added value of youth work alongside other education and youth support services, particularly in supporting vulnerable young people. The authority has committed to maintaining its investment in youth services despite budgetary pressures.

The authority and its schools value and respect the professional skills that the youth workers have in building relationships with young people and supporting them to develop their personal and social skills. Youth workers empower young people to lead activities and shape the services they receive. Youth workers engage effectively with a wide range of partners to develop their provision and support young people who are vulnerable.

The authority's Youth Enterprise team supports young people, particularly those who are vulnerable, to develop the skills and confidence to access and sustain education, employment of training. This team works well with key partners such as schools and

Careers Wales to identify and target support for young people at risk of being not in education, employment or training (NEET). The support is tailored to the young person's views and circumstances. A good example is the opportunity for young people to engage in the Inspire project. The aim of the project is to reduce the risk of young people aged between 11 and 24 years old not progressing into employment, education or training. As a result of this work, dozens of young people gain formal qualifications, including those at risk of leaving school without any recognised qualifications. For some vulnerable young people, staff support their transition successfully from school to college or a training provider. For example, they help them prepare for the change by meeting them at their house early in the morning and being with them for their walk and bus journey in order to build their confidence and provide personal support.

The authority's Youth Service provides a wide range of beneficial activities that are open to all young people. This includes, for example, access to three youth centres, six youth clubs, three Welsh-speaking clubs, the Duke of Edinburgh award, school holiday activities, outreach work in communities outside of the four main towns, and a variety of work with schools, including primary schools. While most of these activities are inclusive for vulnerable young people, the Duke of Edinburgh award, despite having the highest overall participation rate for any local authority in Wales, does not engage enough young people from disadvantaged backgrounds.

The service also provides targeted support for vulnerable young people, such as the Shift project, which provides valuable support for young people's emotional wellbeing and mental health. For example, young people with anxiety issues who are persistently absent from school and socially isolated are supported skilfully by youth workers to access help, gradually reintegrate with their peers and re-engage with their education. The Equality Street group, initially a helpful support group for lesbian, gay, bisexual, transgender young people, and those questioning their sexuality or gender, has expanded to promote equality and diversity more widely with significant success, winning a National Youth Work Excellence Award in 2019.

Despite being well-funded, there are various reasons why services tend to struggle to meet the needs of older young people aged 16-25. For example, services tend to prioritise prevention and intervention work with young people in school and during the immediate period once they leave school. Sharing a border with England, where a considerable number of young people travel for further education, presents a challenge due to the lack of agreed data sharing protocols, which limits the effectiveness of youth services. The local authority is taking suitable action to address these and other barriers to working with older young people.

Leadership and management

Senior leaders set a clear vision for education in Monmouthshire and express this well in their improvement plans. Since the last inspection in 2012, leaders have focused on improving outcomes in schools and for ensuring 'the best possible start in life' for learners. The Leader of the Council, the Chief Executive, and the Chief Officer for Children and Young People have high expectations of officers, schools, other providers and partners. They engender the trust of other stakeholders through transparent communication and they provide a sound and sustained sense of direction for the authority.

A key strength of the authority is how it works with its partners, such as the EAS in supporting its delivery of some of its key ambitions effectively. This includes the strengthening of how it supports, challenges, monitors and intervenes in schools. Senior leaders from the authority play an important strategic role in the quality assurance of the work of the EAS and contribute well to its management, governance and scrutiny. This includes maintaining a positive climate based on mutual trust, which encourages open and transparent professional discussion about challenging issues.

Senior officers and elected members understand well the challenges facing the education service. In particular, the Leader of the Council has a very strong grasp of the main issues and prompts cabinet members and senior officers to continually consider progress against education business plans. This helps to ensure a strong sense of ownership and accountability for the delivery of the education services in Monmouthshire.

Elected members and senior officers have demonstrated their willingness to take difficult decisions, for example over school closures, and staffing and financial issues.

The authority has appropriate procedures for scrutiny and is actively working to improve this function further. The Children and Young People's select committee provides timely scrutiny on a number of relevant issues facing education in the authority. Officers, and partners such as the EAS, provide suitable reports to the committee, and senior officers assist the committee further by providing clarity and relevant additional information during the meetings. Training for scrutiny members is adequate and chairs and select committee members have access to guidance on the role of pre-meetings and generic questions that members may wish to ask to scrutinise and challenge performance or policy.

The authority has a clear ambition and strategy for increasing Welsh-medium provision for learners in Monmouthshire and have steadily increased this provision over time. They consider the views of stakeholders and engage well with other partners when considering future Welsh-medium provision. The authority is considering establishing a new Welsh-medium primary school and is actively looking at the options for secondary provision as well as the implications of other revisions to their provision.

The authority has established clear and consistent self-evaluation processes that allow leaders and managers to identify an overview of strengths and areas for improvement in most areas. Where self-evaluation processes are used effectively they quality assure services well, and inform improvement planning, such as in safeguarding. Where this practice is less effective, the evaluations are not diagnostic enough and do not provide a sufficiently robust analysis of strengths and areas for improvement such as that for SEN and for considering success measures for the attainment of pupils eligible for free-school meals.

Self-evaluation processes provide senior leaders with a good overview of the performance and context of the authority's schools. This enables them to commission effective support for the schools through the regional school improvement service. This is contributing to improvements in many of the authority's schools. The annual chief officer report on children and young people, which is informed by a broad evidence base, provides a useful overview and strategic analysis of pupils' outcomes, schools' performance and contextual issues.

Although the local authority provides appropriate opportunities for children and young people to express their views on service provision, such as through the 'Make Your Mark' event, it does not always maximise the opportunities for them to share their opinions on key priority areas, such as support for learners eligible for free school meals.

Overall, improvement planning processes impact positively on addressing and refining the local authority's high-level priorities and provide a sound basis to manage and direct resources. They are reviewed regularly, allowing officers and elected members to identify and mitigate risk in a timely manner. The processes are mostly reflective and promote a valuable culture of service development and accountability, although a few of the service evaluations are too descriptive and on occasion lack enough critical analysis to inform improvements. Although improvement planning generally takes account of an appropriate range of information and data, it does not always focus sharply enough on the specific aspects of support required or what success might look like. For example, the analysis of data relating to pupils with SEN lacks the depth needed to inform service improvement planning accurately enough.

The authority's performance management processes are appropriate and focus well on supporting staff in undertaking their roles. Members of staff keep up to date with knowledge about their areas of responsibility. The professional learning opportunities offered to them generally support them well to undertake their roles successfully. Staff's performance management improvement objectives relate closely to their specific developmental needs, but they do not always align well enough to the priorities in the authority's improvement plans.

Over the last three years, leaders have consciously worked at improving communication with stakeholders and forming positive relationships with the authority's schools. The authority promotes a culture of collaboration across its departments, its schools and partner organisations.

Senior officers have benefited well from the close supporting relationships they have with senior officers in other local authorities. This has enabled them to establish effective policies and procedures and improve their practice of supporting schools and young people. There have been worthwhile opportunities for officers to benefit from professional development by working with other agencies to refine their practice. Effective examples include working with specialists in the early years sector to improve the authority's strategy for nursery provision and learning more about self-evaluation in terms of the youth service. The authority is beginning to share its good practice with other local authorities and actively encourages staff from its schools to share any effective practice that they have with other partners within the local authority area, the region and beyond.

Safeguarding in education services is good. The importance of safeguarding as a corporate responsibility is particularly strong. The establishment of strong working relationships across the local authority for the effective delivery of safeguarding means that education services and schools are supported well. In particular, the working relationship between social services and education services is especially effective. The local authority has clear corporate policies and procedures, which set out well the responsibilities of all staff as well as those with lead safeguarding roles. The role of the whole authority safeguarding group provides an effective forum within which safeguarding is monitored, managed and evaluated.

The local authority has a robust quality assurance process for safeguarding. All local authority services undertake an annual safeguarding self-evaluation, which produce red, amber, or green (RAG) ratings against set criteria. The lead officer for safeguarding in education monitors the outcomes of these self-evaluations well, and where necessary challenges red ratings and verifies green ratings, which leads to remedial action when needed.

Safe recruitment procedures are robust. The steps taken to recruit paid and unpaid staff are recorded clearly and include outcomes of all required pre-employment checks. Monthly exception reports are used to verify that all required actions have been taken, and are reported to the local authority's senior managers. Annual onsite checks are made in all schools to verify these records are complete.

All allegations against staff are taken seriously and are assessed through a professional strategy meeting, which leads to clearly concluded outcomes, with clear actions set for any succeeding stages. Where required, headteachers and governing bodies are supported well by human resources and the lead officer for safeguarding in education.

Safeguarding management reports capture well the key messages regarding safeguarding activity within education services. These reports provides senior managers and elected members a clear analysis of emerging risks or areas for development.

The authority plans its annual budgets carefully, demonstrating its commitment to education. Funding for Monmouthshire schools remains below average compared to that for other schools in Wales and the spend on other education services such as the Youth Service is above average. In 2018-2019, budget pressures, particularly around special education needs provision and schools' budgets, contributed to an overall education budget overspend.

The authority provides effective support to the school budget forum, which considers important issues that affect schools. The forum played a key role in the recent review of the funding formula used to delegate funding for schools, such as agreeing elements of the formula in need of review and considered the impact of proposed changes on individual schools.

Schools' deficits have notably increased over recent years resulting in Monmouthshire's net balance at March 2019 being amongst the lowest in Wales; a very few schools are carrying significant negative balances. Whilst there are recovery plans in place, agreed with senior managers and cabinet members, the authority is considering the use of loans for schools. It is yet to identify the wider implications for schools of holding such low levels of reserves and the impact of introducing loans.

The authority works well with a range of partners in Monmouthshire and, regionally, and has a comprehensive range of service-level-agreements that provide flexibility for schools to choose the level of their participation and access to support services. Overall, the number of schools who use these services is high.

The authority has improved its school buildings, supported by the Welsh Government 21st Century Schools programme, and has completed condition surveys to inform capital programme priorities. In developing its new Local Development Plan, the authority is also considering future pupil numbers in relation to new housing developments. This will help inform future budget and capital decisions.

Evidence base of the report

Before the inspection, inspectors:

- consult the local authority on the local inspection questions to be used during the inspection, based on the authority's self-evaluation, strategic plans and relevant data held by Estyn
- analyse the outcomes from open questionnaires, including the views of learners, parents, school staff and governors, local authority staff, regional consortium staff, elected members and general public
- carry out a preliminary visit to the local authority to meet with a range of relevant partners to education services, such as learner representatives, headteachers and governors, and leaders from statutory and third sector agencies working with children and young people

During the inspection, inspectors normally:

- meet with the leader of the council, elected members responsible for education services, elected members responsible for the scrutiny of education services, the chief executive, the director of education, other leaders and managers in education services, other relevant staff in the local authority, the managing director of the regional consortium for school improvement and other relevant staff from the regional consortium
- look closely at the local authority's self-evaluation processes
- consider the local authority's strategic and operational plans for improvement
- scrutinise a variety of documents, including information on learner outcomes, information on the performance of schools and other education settings, including information from the regional consortium for school improvement, minutes from a range of meetings, reports presented to council or scrutiny, information relating to the safeguarding of learners and any other information relevant to the local authority's education services held by Estyn

After the on-site inspection and before the publication of the report, Estyn:

- review the findings of the inspection alongside the supporting evidence from the inspection team in order to validate, moderate and ensure the quality of the inspection
- provide a draft copy of the report for the local authority to note any concerns with factual accuracy, and made amendments where necessary

Copies of the report

Copies of this report are available from the local authority and from the Estyn website (www.estyn.gov.wales)

The report was produced in accordance with Section 38 of the Education Act 1997, the Children Act 2004 and the Learning and Skills Act 2000.

Every possible care has been taken to ensure that the information in this document is accurate at the time of going to press. Any enquiries or comments regarding this document/publication should be addressed to:

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Publication date: 21/04/2020