



## CONSULTATION RESPONSE

Submitted by: Director of Education, Church in Wales

### 1) Please indicate which of the following reflects your views on the proposal

I do not support the proposal

#### Rationale:

The Church in Wales does not support the proposal to discontinue Cilgerran Church in Wales Voluntary Controlled School and re-establish it as a Community School. The proposal removes faith-based education from a wide rural area without demonstrating educational, financial, or strategic necessity, and fails to give due weight to equality, land ownership, and alternative governance solutions.

### 2) Please provide any alternatives you have to the Council's proposal

The Church in Wales proposes the following alternatives, all of which better align with the School Organisation Code and Welsh Government policy:

1. **Maintain the status quo** and retain Cilgerran as a Voluntary Controlled school, given that:
  - The school is performing well educationally.
  - No savings or reduction in surplus places will result from the proposed change.
  - There is no immediate leadership vacancy requiring federation.
2. **Pursue a federation or collaboration model between VC schools**, or a mixed governance solution, as has been achieved elsewhere in Wales, rather than removing VC status.
3. **Support executive or shared leadership arrangements** (including temporary or cluster-based leadership), which do not require a change of school category and are already proven solutions to headteacher recruitment challenges.
4. **Invite expressions of interest from neighbouring schools** regarding a voluntary change to VC status, rather than unilaterally removing the VC status of the only faith school in the area.

The Local Authority has dismissed these alternatives without providing robust evidence or comparative analysis.

### 3) What effects do you feel the proposal(s) would have on:

- opportunities for persons to use the Welsh language
- treating the Welsh language no less favourably than the English language

The Church in Wales agrees that the Welsh-medium status of the school would technically remain unchanged. However, the proposal fails to recognise the integrated role of faith, language, culture, and community within Welsh-medium Church schools.

The removal of VC status risks:

- Weakening the distinctive ethos that supports bilingualism, community cohesion, and identity.
- Undermining parental confidence in Welsh-medium faith education, potentially affecting future enrolment patterns.

While Welsh language provision may remain in name, the proposal diminishes the holistic cultural context in which Welsh is currently embedded.

**Please consider if the proposal can be changed to have positive effects (or reduce negative effects)**

The proposal could be improved by:

- Retaining VC status while exploring federation models compatible with faith schools.
- Recognising faith-based education as a protected and valued element of Welsh-medium provision.
- Explicitly safeguarding parental choice for faith education in rural Wales.

Without these changes, the proposal unnecessarily creates negative impacts.

#### **4) Please provide any other comments on the proposal**

The Church in Wales has serious concerns that this proposal:

- **Removes a protected characteristic (religion and belief)** from local education provision, acknowledged by the Council itself as a negative equality impact.
- **Disadvantages rural families**, for whom the nearest alternative Church school is over 23 miles away, effectively removing meaningful access to faith-based education.
- **Fails to demonstrate necessity**, as:
  - No financial savings are identified.
  - No reduction in surplus places will occur.
  - Educational standards are already strong.
- **Assumes continued use of Church-owned land and buildings**, despite acknowledging that ownership rests with the St Davids Diocesan Board of Finance and that continued occupation would require negotiation.



This represents a significant strategic and legal risk that has not been adequately addressed in the proposal's risk assessment.

The Church in Wales believes the proposal serves administrative convenience rather than educational need and should not proceed.

## **KEY POINTS THE CHURCH IN WALES FORMALLY CHALLENGES**

### **1. Equality and Protected Characteristics**

- Religion and belief is explicitly identified as a negatively impacted protected characteristic.
- The proposal removes the only faith school in the area, with no reasonable alternative access.
- This is a disproportionate response to a hypothetical future leadership issue.

### **2. Lack of Educational Justification**

- Estyn's and improvement advisers' evidence confirms that the school is performing well.
- The Council admits that the proposal will have no impact on standards, teaching, leadership, or wellbeing.
- Removing VC status therefore adds no educational value.

### **3. Failure to Demonstrate Financial or Strategic Benefit**

- The Council confirms:
  - **No savings**
  - **No reduction in surplus places**
  - **No capital benefit**
- This fails the "value for money" test set out in the School Organisation Code.

### **4. Weak Federation Argument**

- Federation is presented as a future possibility, not a current necessity.
- No partner schools are identified.
- Proven VC-to-VC federation models are dismissed without adequate rationale.

### **5. Land Ownership Risk**

- The school site is owned by the Diocesan Board of Finance.
- The proposal assumes continued occupation by a non-faith school.
- This risk is not included in the Council's risk register, despite being fundamental to deliverability.

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THE CHURCH  
IN WALES

## **6. Presumption Against Rural School Change**

- While framed as a “technical closure”, the proposal:
  - Removes a distinctive rural provision.
  - Weakens community cohesion.
  - Undermines parental choice in a rural context.

## **CONCLUSION**

The Church in Wales cannot support this proposal. It removes faith-based education without necessity, benefit, or proper consideration of alternatives, equality duties, or land ownership realities. The Local Authority has not met the threshold required under the School Organisation Code to justify this change.

**Ysgol Cilgerran should remain a Voluntary Controlled school.**