

CABINET MEETING: 14th July

**SCHOOL ORGANISATION PROPOSALS: SPECIALIST PROVISION FOR
PRIMARY AGED PUPILS WITH SPEECH AND LANGUAGE DIFFICULTIES,
AND WITH BEHAVIOURAL EMOTIONAL AND SOCIAL DIFFICULTIES.**

REPORT OF DIRECTOR OF EDUCATION AND LIFELONG LEARNING

AGENDA ITEM: 10

PORTFOLIO: EDUCATION (COUNCILLOR SARAH MERRY)

Reason for this Report

1. To inform the Cabinet of responses received following the consultation on specialist provision for primary aged pupils with speech and language difficulties and with behavioural social and emotional difficulties.

Background

2. At its meeting on 03 December 2015 the Cabinet authorised officers to undertake a public consultation on proposals to:
 - Close Meadowbank Special School at the end of the academic year 2017.
 - Continue to maintain a Specialist Resource Base (SRB) at Allensbank School but cease admission of pupils with speech and language difficulties, unless transferring from Meadowbank Special School. Redesignate this as an SRB for pupils with autism spectrum conditions (ASC), with first admission of ASC children in September 2018.
 - Continue to maintain a Specialist Resource Base at Fairwater School but cease admission of pupils with statements for behaviour emotional and social difficulties. Redesignate this as an Early Intervention Class (EIC) from September 2018.
 - Maintain the specialist classes at Glan Yr Afon (Revolving Door) and Springwood (Nurture Class), but rebadge these as Early Intervention Classes, adopting the proposed admission criteria and operational procedures outlined above from September 2018.
 - Identify four additional primary schools (one in Welsh-medium sector, three school in the English-medium sector) in various locations across the city to host Early Intervention Classes.

Issues

3. The consultation ran from 11 February to 06 April 2016.
4. Parents and others in the local community, together with staff and Governors of the affected schools were invited to respond to the consultation.
5. The consultation process involved:
 - Distribution of a Consultation Document outlining background, rationale and implications. This document has been distributed to parents, Headteachers and Chairs of Governors of affected schools, all Members and other stakeholders. (a copy of the consultation document can be seen at Appendix 1);
 - Meetings with Staff and Governors of the schools affected and a public meeting at which the proposal and the options were explained and questions answered;
 - Meetings with parent of children currently attending the affected SRBs or special school;
 - Two public drop in sessions where officers were available to answer questions;
 - Questionnaires were provided for pupils at the affected schools, to be completed with the help of their teachers;
 - A consultation response slip for return by post or e-mail, attached to the consultation document;
 - An online response form at www.cardiff.gov.uk/21st Century Schools.

Responses received during the consultation period

6. In total 253 responses were received including 52 online responses and 201 paper/ e-mail responses).
7. Responses were received from Estyn, Governing Bodies of schools, Headteachers, other stakeholders including The Cardiff and the Vale Speech and Language Therapists, the Royal College of Speech and Language Therapists, Afasic, the Welsh Language Commissioner and the Social Services Directorate and from school staff, parents, pupils and members of the public
8. Formal responses are included in Appendix 2.
9. The views expressed at Council organised meetings and on paper or electronically through the appropriate channels, have been recorded.

10. The majority view expressed during the consultation at meetings and in written correspondence was one of opposition to the proposed closure of Meadowbank Special School and re-designation of Allensbank SRB for speech and language as an SRB for autism spectrum conditions.
11. A minority of the responses also expressed a view about the proposal to open a network of Early Intervention Classes. Those who did so expressed concern about a lack of clarity regarding the purpose and criteria for these classes.
12. A summary of the main views expressed and the Council's response are set out below.
13. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.

Estyn Response

14. A response from Estyn noted the following points (for the full response, please see Appendix 2):
 - *The clear rationale for the proposal responds to the falling demand for speech and language places and the increased demand for provision for other areas of special education need.*
 - *The clear Additional Learning Needs (ALN) Strategy, which sets out the principles and high-level actions for developing SEN provision through School Organisation Planning.*
 - *The clearly defined the reasons why Meadowbank Special School should close, for the re-designation of existing SRBs and for the identification of additional primary school to host Early Intervention Classes, including one in the Welsh medium sector.*
 - *Estyn's opinion that the proposal is likely to at least maintain the educational outcomes and provision for pupils in the area.*

Appraisal of views expressed by ESTYN

15. The Council acknowledges the views expressed.

Governing Bodies' Responses

16. Responses were received from the Governing Bodies of Meadowbank, Allensbank, Fairwater, Glan Yr Afon, and Springwood primary schools. The full responses are included in Appendix 2.
17. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.

18. The Governing Body of Meadowbank School expressed the following views:
- *Meadowbank has been a great resource for the whole primary sector in Cardiff and has successfully promoted integration.*
 - *The school was not adequately engaged in the development of proposals for the provision for primary aged pupils with speech and language difficulties.*
 - *The proposal would lead to the dispersal of expertise at Meadowbank, and risk losing key skills from Cardiff.*
 - *Mainstream placements are unlikely to be suitable for all primary pupils with severe needs.*
 - *The shift in parental preference has not been adequately explained.*
 - *The recently established school-based therapy service is not yet fully tested in practice.*
 - *Concerns were expressed regarding the strategy to consider Early Intervention Classes focusing on children with behavioural emotional and social difficulties in parallel with speech and language provision.*
 - *Meadowbank should preserve its status as a centre of excellence, and to further develop its links to mainstream, such as through:*
 - Day classes;*
 - Short term admissions for intensive support;*
 - Longer term support for pupils not ready or suitable for mainstream, where appropriate;*
 - Centre of expertise for training teachers and other staff in mainstream;*
 - Provision of specialist speech and language therapy services.*
19. The Governing Body of Allensbank Primary School made the following points:
- *Recognised a reduced demand for speech and language provision but consider there is a continuing role for some specialist provision for speech and language.*
 - *Allensbank would be willing to become an ASC base.*
 - *During the transition phase, the Governing Body would wish to avoid a temporary mix of needs in the base, with children with ASC and specific language impairments in one class, and a temporary mix of foundation phase and KS2 pupils in one class.*
20. The response from the Governing Body of Fairwater Primary School included the following points:
- *The school would not wish to open an Early Intervention Class. There is insufficient information provided at this stage regarding the proposed change of provision.*
 - *Concerns expressed regarding pupils with speech and language difficulties and behavioural and emotional social needs in the same class.*
 - *Concerns expressed regarding pupils in Early Intervention Classes returning to mainstream classes within 3-4 school terms.*

- *The Fairwater Primary School Governing Body wish for nursery provision to be established at the school, and for the existing SRB to close.*
21. The Glan yr Afon Primary School Governing Body expressed their views at a consultation meeting held at the school, and through a written response from one governor:
- *The Governing Body would consider hosting an EIC if they were able to negotiate on the age and severity of the pupils admitted to the class.*
 - *Admitting Year 5 and 6 pupils with severe needs to the Revolving Door class has a detrimental impact on the school but functions well when places are occupied by year 3 and 4 children.*
22. The response from the Governing Body of Springwood Primary School included the following points:
- *Consideration must be given to ensuring there is sufficient accommodation in the school should the LA decide to base other services onsite. Operating with a much reduced space may impact on the ability to accommodate an EIC.*
 - *A wish for clarity around the nature of the children who would attend the EIC.*
 - *Concern around a panel of Headteachers and staff placing children without input from a school's senior leadership or governors.*
 - *Concern that the mix of children with autism attending the school's SRB for autism) and pupils with complex emotional social and behavioural needs would be difficult to manage in one school.*

Appraisal of views expressed by Governing Bodies

23. The Council notes the views expressed by the Governing Bodies that responded to the consultation.
24. The Council has worked in partnership with Meadowbank on a number of projects to develop speech and language provision including a review of secondary support for pupils with severe specific language impairments and the review and further development of an outreach service to support pupils in nursery settings.
25. The key criteria for the Early Intervention Classes would be 'children at risk of exclusion' i.e. those who are experiencing behavioural difficulties. However, the child's needs would be addressed holistically, including any speech and language needs, and any specific difficulties with literacy and numeracy that may co-exist with the child's emotional and social needs.
26. The demand for special school and SRB places for children with specific language impairments has been falling in Cardiff and other local authorities for many years. The decline in numbers since 2010 is set out in the table below, but the fall in demand was already an ongoing trend. Prior to 2006, Allensbank SRB offered 30 places. A

class was closed in 2006, in response to falling numbers, and the Allensbank class size reduced from 20 to 16 in 2011. The reasons for this trend are set out in the consultation document on pages 5-7.

Meadowbank and Allensbank SRB numbers on roll, 2010-2015

	M'bank	Allensbank	total pupils
2010-11	40	18	58
2011-12	35	18	53
2012-13	34	13	47
2013-14	32	16	48
2014-15	27	14	41
Nov-15	23	11	34

27. A key aspiration for the Council is to achieve staff reduction as far as possible through redeployment rather than voluntary redundancy or compulsory redundancy. Therefore, the Council is committed to maximising opportunities for school staff to secure employment in other schools in Cardiff and if the proposal were progressed, would facilitate a redeployment process. If progressed, the proposal would generate a range of new specialist posts in the city which would provide the opportunity to retain specialist skills in Cardiff.
28. The Council acknowledges that the view that there is an ongoing need for some specialist provision for children with the most complex speech language and communication needs (SLCN) and that this view is shared by the majority of respondents. The Council will therefore give further consideration to this issue with a view to retaining some specialist provision for speech and language in the future.
29. The Governing Body's suggestion that Meadowbank could develop a different role, providing part-time and short-term placements for pupils, and providing specialist support and training to mainstream, is noted. However:
- An SRB would generally be considered to be a more effective way to provide part-time and short term placements than a Special School, as the mainstream location of an SRB ensures children remain in contact with mainstream peers and good language role models.
 - SRBs are a more cost effective means of providing short term and part time placements. The cost of an SRB place is between one third to one-half the cost of a special school place.
 - In Cardiff, a comprehensive programme of training and support to mainstream is provided by the specialist teacher service in partnership with the UHB speech and language therapy service.

30. The concerns of the Governing Body of Allensbank regarding redevelopment are noted. If the proposal were progressed, the Council would work with the Governing Body to avoid any mix of needs or ages that would impact negatively on pupils.
31. It is noted that Fairwater Primary School does not wish to host an EIC. It is considered that further discussion to clarify the criteria and purpose of the EIC may reassure the Governing Body on a number of points. However, it is important that host schools are willing partners in the process of establishing the classes, and alternative locations will be considered in light of this response.
32. It is anticipated that pupils placed in the EICs would have less complex long-term needs than the pupils currently based in the SRB and there would be good prospects for reintegration. The Council maintains special school places at The Court School for children with long-term behaviour, emotional and social needs (BESN).
33. The desire of the Fairwater Primary School Governing Body for nursery provision is outside the scope of this consultation. Should the Council identify a need to establish a nursery at the school, there is sufficient space to continue hosting a specialist class.
34. Any decision to close the existing Fairwater SRB would be subject to a full public consultation, and a formal decision by Cabinet. Before undertaking consultation on this issue, the Council would need to secure suitable alternative provision for children with behaviour, emotional and social needs, such as the Early Intervention Classes, to ensure closure would not result in pupils unable to access the provision they need.
35. The Council notes the response of the Glan Yr Afon Primary School Governing Body. If the proposal were progressed there would be further discussion with the school to clarify the criteria and age range for the Early Intervention Class. The classes are intended as an early intervention and there would be scope to identify some classes for a younger age range.
36. The views of the Springwood Primary School Governing body are noted. Host schools would be represented on admission panels and would have a say in which pupils should be admitted. Consideration would be given to the mix of needs and ages in each class and whether the class is able to meet the needs of each child.
37. The Council acknowledges the Governing Body's concern that the existing SRB for children with autism spectrum conditions should not be compromised by accommodating a specialist provision for children with BESN at the school. Alternative locations for the EIC would therefore be considered.

Primary School Headteachers' Responses

38. Primary school Headteachers provided a collective response setting out their opposition to the proposed closure of Meadowbank Special School and to the re-designation of Allensbank SRB. Separate responses were also received from the Headteachers of Meadowbank, Moorland and Springwood primary schools.
39. The full responses are included in Appendix 2.
40. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.
41. The collective primary school Headteachers' response included the following points:
- *Meeting the needs of the most complex children has improved but remains a challenge.*
 - *The fall in demand for places at Meadowbank and Allensbank correlates with fewer statements for children with speech language and communication needs being issued in recent years.*
 - *The skills of highly trained staff in specialist environments is often the most effective way of securing the best outcomes for these learners with speech language and communication skills and challenging behaviour.*
 - *Greater emphasis should be placed on speech, language and communication assessments for children whose overt needs appear behavioural. Early support for SLCN is essential to reduce the risk of young people becoming NEET (Not in Education Employment or Training).*
 - *The high proportion of Meadowbank and Allensbank pupils who successfully reintegrate to mainstream is evidence of the high quality teaching they received and the long lasting impact of the placements. This level of reintegration is not the case for any other specialist provision within the city.*
42. The response of the Headteacher of Meadowbank School raised the following points:
- *Opposition to the closure of Meadowbank School,*
 - *Support for the redesignation of Allensbank SRB*
 - *Support for the development of EICs:*
 - *Children with severe and profound speech and language impairments (SLI) require a small class setting with experienced teaching staff that understand speech and language difficulties, specialist resources and specialised teaching approaches and strategies. Meadowbank is a centre of excellence that provides all of the above.*
 - *Attending Meadowbank School ensures that children have an effective start to their education that often leads to them being successfully reintegrated into a mainstream school.*

- *Concern expressed that there is insufficient data presented to demonstrate that children with SLI in mainstream classes make progress.*
- *Meadowbank staff, governors and parents believe that parental preference has been guided away from specialist provision by the local authority.*
- *Concern that the local authority is planning to close Meadowbank School whatever the outcome of the consultation.*
- *Concern that the closure of Meadowbank School would lead to a loss of expertise, fragmented multi-agency working, reduced intensity and specialised speech and language therapy and a reduction in choice of schools for parents.*
- *Concern that there would be no specialist provision for SLI in Cardiff. All other local authorities in Wales have some form of specialist provision for children with SLI.*
- *Meadowbank School should be retained as a 'Centre of Excellence'.*
- *Meadowbank can provide mainstream opportunities and experiences for children more effectively than Allensbank by providing this provision in a child's own local school, enabling the child to develop a supportive peer group before they transfer to secondary school.*

43. The response of the Headteacher of Springwood Primary School raised the following points:

- *Meadowbank School should not close but should address the shortage of places for pupils with behaviour issues.*
- *Opposition to the development of EICs*
- *Support for the redesignation of Allensbank SRB:*
- *Pupils with behaviour needs and pupils with speech and language, communication needs should not be in the same specialist class.*
- *The EIC classes should have a set age range as the needs of Key Stage 2 pupils are very different to those of Foundation Phase pupils.*
- *Disagrees that behaviour emotional and social difficulties are caused by speech and language difficulties.*
- *Concern that there is not enough support in place for pupils who are displaying negative behaviours*

44. The response of the Headteacher of Moorland Primary School raised the following points:

- *Meadowbank School should not close but the Council should explore whether BESN/ SLCN provision could be developed at the school.*
- *Support for the proposed development of EICs.*
- *Concern expressed that the needs of the pupils in the EICs will be too broad.*
- *Concern at the sufficiency of EIC places.*
- *There is a need to ensure an equitable system for placement across the city, recognising that the demand/threshold in some areas will be much higher than in others.*

Appraisal of views expressed by Headteachers

45. The Council acknowledges that Headteachers consider there is an ongoing need for some specialist provision for children with the most complex SLCN and that this view is shared by the majority of respondents. The Council will therefore give further consideration to this issue with a view to retaining some specialist provision for children with speech and language needs.
46. Evidence suggests the majority of the pupils supported in mainstream are making good progress against the targets set by therapists and specialist teachers.
- In Autumn 2015:
 - a. 96% of pupils supported at School Action plus met or partially met their targets,
 - b. 97% of pupils with statements met or partially met their targets.
 - In Spring 2016:
 - c. 87% of pupils at School Action plus met or partially met their targets,
 - d. 100% of statemented pupils met their targets.
47. The number of new statements for speech and language has fallen since the funding for statements was delegated to schools in 2012, as would be expected. However, the Local Authority continues to issue statements for pupils with the most significant needs so this would not be expected to impact on demand for special school places.
48. It is not correct to state that parents have been directed away from the special school. When issuing a statement of special educational needs, the local authority provides parents with a full list of schools, including special schools and specialist resource bases, and asks parents to identify their preferred school. Parents are encouraged to visit schools before making a decision. The factors leading to fewer requests for specialist placements are set out in the consultation document on pages 5-7 and include the following:
- A national policy and expectation for inclusion, reinforced by equalities legislation and a responsibility on local authorities to increase the extent to which children's special educational needs can be met in mainstream;
 - A successful programme of capacity building and early intervention, including universal screening for speech and language for all Reception aged children, extensive training, and specialist support from specialist teachers. This has significantly improved parental confidence in mainstream support.
 - Approximately 88% of children with the most severe speech and language needs attend their local mainstream school and evidence shows that they make good progress with the specialist support they receive (see paragraph 46).

49. Local Authorities in Wales have been surveyed regarding their provision for SLCN. Four local authorities responded. Bridgend and Pembrokeshire report that they no longer maintain specialist provision for SLCN but instead support all SLCN children in mainstream classes. Rhondda Cynon Taf and Carmarthen continue to maintain SRBs for speech and language but report a fall in the demand for SRB places, resulting from improved support in mainstream and parental expectation of mainstream inclusion.
50. A survey of English and Welsh local authority websites and school lists in England and Wales identified that no other local authority maintains a special school for specific language impairment although the majority do maintain SRBs. There is a small number of Independent Special Schools for SLI in England.
51. Multi agency working in Cardiff to support speech and language is strong and is not based on any single setting. The Council does not agree that this would be fragmented if the special school closed.
52. It is recognised that Meadowbank has supported reintegration of some pupils to their local mainstream schools: this has also been an outcome for some Allensbank SRB pupils. However, a strength of a specialist resource base is that it can provide mainstream learning experiences and good language role models throughout the period of the placement, which a special school does not have access to.
53. The Council recognises the need to increase provision for children with behavioural, emotional and social needs (BESN). If the proposal were progressed, places in mainstream-based provision for BESN would increase from 26 places (at Fairwater SRB, Glan yr Afon Revolving Door and Springwood Nurture Class) to 56 places. This would include a class in a Welsh medium school.
54. The criteria for placement in an EIC, and the range of needs are clarified in paragraph 25.
55. If the proposal were progressed, further work would be undertaken to clarify the age range for each Early Intervention Class. It is anticipated that some would admit Foundation Phase children while others would be designated for Key Stage 2.
56. Many respondents shared the view that the use of 'neighbourhood panels' could lead to inequitable access to the Early Intervention Classes. If the proposal were progressed, the Council would work with all schools to agree on a fair approach to placements.
57. Based on current levels of referral, it has been calculated that 56 EIC places would be sufficient to respond to current need.
58. The Council acknowledges the points made regarding the high incidence of SLCN in children and young people with behavioural

emotional and social needs. A range of steps have been taken in Cardiff to address this including:

- Universal screening for speech and language needs in Reception.
- A collaborative approach between the specialist teacher service and the UHB speech and language therapy service to ensure every child with a diagnosed need receives appropriate support.
- Joint working between the specialist teacher services for speech and language and for behaviour support. A speech and language therapist employed by Education to work in both teams.
- Where schools refer children for behaviour support, the Partnership Area Referral Meeting (PARM) routinely requires information about the child's speech and language scores, literacy and numeracy levels and considers support needs holistically.
- Two terms of intensive support at The Court Special school to embed Speech and Language Links and to develop a range of speech and language interventions in the practice of the school.
- Arranging for the Youth Offending Service to be included in speech and language training provided by AFASIC.
- There are plans to work with Bryn y Deryn and Greenhill to embed speech and language screening and to undertake further collaborative work with the Youth Offending Service.

59. The Council will consider any further steps that may be needed to screen and support pupils who have been identified as being 'at risk' to prevent young people becoming 'NEET'.

60. Should the Council proceed with proposed development of the network of 7 Early Intervention Classes, this would require a revenue investment of £364,896 per annum (based on 2016 costs) plus an initial capital investment to adapt appropriate classrooms. The proposal is based on a reinvestment of resources which would be released from the closure of Meadowbank School. To retain Meadowbank while also opening the Early Intervention Classes, as suggested by some respondents, additional resources would need to be identified.

61. Consideration of developing Meadowbank as a provision for BESN is noted but is beyond the scope of this consultation.

Formal responses from statutory and voluntary sector partners

62. Formal responses were received from Cardiff and the Vale Speech and Language Therapists, the Royal College of Speech and Language Therapists, Afasic, the Welsh Language Commissioner and the Social Services Directorate of Cardiff Council. The full responses are included in Appendix 2.

63. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.

64. Therapists employed by Cardiff and the Vale University Health Board provided a collective response which included the following points:
- *A very positive collaborative working relationship has been established with the Education Service in recent years, with many joint initiatives and projects including setting up a mainstream speech and language therapy service to local primary and high schools.*
 - *Concern expressed that although many children with speech and language difficulties can be managed within mainstream settings, mainstream schools are not able to deliver highly specialised interventions to the most needy pupils*
 - *There should be some specific and specialist provision for the small percentage of children that require short-term, specialist, intensive speech and language intervention in the early years.*
 - *The school-based therapy service is currently a pilot established in response to feedback from parents and schools that they would prefer children to access this support in school, and was not intended to replace specialist provision. It has not been evaluated and therefore no conclusion has been reached on the future of this aspect of the therapy service.*
 - *The EICs do not appear to include the needs of children with severe speech and language difficulties.*
 - *Research shows that children with significant language impairment are at risk of behavioural difficulties, mental health problems, and of becoming offenders in adolescence and adulthood.*
 - *Speech Links and Language Links are screening tools only and do not provide a comprehensive language or speech sound assessment. The local authority should not over-rely on this data as an outcome measure for children with children with severe and complex language difficulties.*
 - *The increased demand for specialist provision for children with autism is acknowledged but there are concerns about whether there is scope to develop a suitable environment at Allensbank. For example, having enough space to create 'quiet' or 'sensory' areas.*
65. The Royal College of Speech and Language Therapists (RCSLT) made the following points:
- *There should be a focus on inclusion of children with special needs in mainstream settings but this should be balanced by a requirement for specialist services to be delivered flexibly in order to enable inclusion.*
 - *In an inclusive society, specialist and targeted services for these children should be integral to universal mainstream provision. The integration of education, health and social care for children means they should be able to access all the services they require-whether universal, targeted or specialist, flexibly and locally wherever possible.*
 - *In this response, RCSLT would wish to stress the need to ensure that children with speech language and communication difficulties*

in Cardiff receive the service that they need, which includes the availability of adequate specialist places within a given area.

- *RCSLT would wish to see the availability of specialist resource bases with the philosophy of short-term intensive support with the outcome of returning to mainstream education.*

66. The Social Services Directorate of Cardiff Council provided a response, which outlined support for the proposal. The response includes the following points:

- *Social Services would support the inclusion of children and young people within their local communities, receiving educational, social and community support as close to home as possible.*
- *It would be beneficial to consider the learning and support needs of Allensbank School as part of the change of delivery proposal.*
- *Clarification of measures being taken to support the school as an improving school are required.*

67. The formal response from Afasic opposed the closure of Meadowbank and redesignation of Allensbank SRB. The response included the following points:

- *The proposals contradict principles set out by the Cardiff Council Additional Learning Needs Strategy on page 9 of the consultation document.*
- *The proposals appear to suggest pupils do not benefit from specialist provision, which is not the case.*
- *The proposals do not offer a full and fair picture of evidence. There is insufficient evidence to support the view that children's needs are fully met in mainstream.*
- *The proposals wrongly suggest that a specialist placement is incompatible with inclusion.*
- *Gaps in knowledge and skills, and lack of capacity in mainstream, and there is no provision for increasing the mainstream service to compensate for closure, or set out a plan to retain the skills of specialist staff at Meadowbank.*
- *The proposals are vague and do not offer parents an alternative but equivalent effective learning environment, such as dual placements with a combination of full and part time places, with short, medium or longer term admission as appropriate.*
- *There is no information about how speech and language therapy will be offered as part of the proposed changes.*

68. A formal response from the Welsh Language Commissioner included the following points:

- *The proposals acknowledge the importance of language to pupils and of addressing this in any reorganisation of SEN support*
- *The changes to school organisation must ensure that any internal or external support provided by the relevant agencies is available in Welsh. Educational psychology, specialist teaching and information for parents should be available in Welsh.*

- *Staff development planning is needed to ensure a sufficient number of special educational needs (SEN) staff who are able to provide support through the medium of Welsh.*

Appraisal of views expressed by statutory and voluntary sector partners

69. It is acknowledged that the school-based service currently provided by the UHB speech and language therapists is a pilot scheme and has not yet been evaluated, and that it was not set up to replace specialist provision.
70. The Council notes the comments regarding a mainstream approach to support, including the need for adequate specialist places focused on short-term intensive support. The view that there is an ongoing need for some specialist provision for SLCN is shared by the majority of respondents. The Council will therefore give further consideration to this issue with a view to retaining some specialist provision for children with speech and language needs.
71. If the proposals were progressed, a range of training and development opportunities would be provided to ensure Allensbank Primary School is able to develop the skills and practice required to support pupils with autism spectrum conditions. The Central South Consortium also provide support to the school to ensure further improvement.
72. The point made about the need to consider extension of the specialist speech and language support service to improve the support available in mainstream schools is noted. Further consideration will be given to this point.
73. The Council does not agree that the proposals contradict the principles set out in Cardiff Council's Additional Learning Needs Strategic Framework. The principles are set out on page 9 of the consultation document and the proposal is consistent with these principles. Of particular relevance are the following:
- An effective graduated response to additional learning needs is underpinned by collaboration with health, children's services and other partners.
 - With the right training, strategies and support, nearly all children with special educational needs can be successfully included in mainstream education.
 - As far as practicable, provision for special educational needs should be locally based, to reduce the extent to which children travel to access education.
74. A response to the suggestion that the role of Meadowbank School could be developed to provide a mixture of short and long term places is set out in paragraph 29.
75. The need for staff development planning and to ensure external support services are available in Welsh is acknowledged. A range of

continuing professional development opportunities are available to staff in English and Welsh language settings. The Educational Psychology Service delivers services in Welsh and English. A Welsh language audit has identified the need to increase Welsh language capacity in the specialist teacher team and will be addressed through planned recruitment.

Responses of staff, parents, pupils and other stakeholders

76. Meadowbank Staff provided a collective response and a number of individual responses were received from Meadowbank staff and from other schools.
77. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.
78. The responses included the following points:
- *There has been good capacity building in mainstream schools which has improved the speech and language support available for all children, and for those with communication delays.*
 - *Mainstream schools do not have enough resources, staff or time to fully support children with the most needs.*
 - *There are many children in mainstream schools who could benefit from the support of Meadowbank, but parents are not aware of the school and don't know what support would be available.*
 - *The Day Class was a good way to provide intensive part time support and to assess whether a specialist placement was needed. This should be reinstated.*
 - *The central team of 4.6 specialist teachers is inadequate to support all of the children who currently need direct support.*
 - *The number of children being identified with SLCN is increasing in Cardiff: there is a need to ensure there is provision for these pupils.*
 - *Responses from other staff included the following points:*
 - *That the proposal is a cost-cutting exercise, at the expense of children with special educational needs.*
 - *That more provision for children with BESN is needed, but the criteria and purpose of EICs is not sufficiently clear.*
79. Responses from parents and other family members of pupils and former pupils of Meadowbank School strongly opposed the closure of Meadowbank School. Their responses included the following points:
- *A special school placement has been essential to meet their child's needs.*
 - *Mainstream and SRB placements would not be able to offer the level of specialist support that has been provided by Meadowbank.*
 - *Some families cite experiences of social isolation and bullying prior to their child's admission to Meadowbank.*
 - *Parents value the support for the whole family provided by Meadowbank.*

- *Families believe that parents do not have enough information about Meadowbank and urged the Council to 'advertise' the school more widely.*
 - *Many families refer to the day Class as a good way to have become familiar with the school prior to admission and suggest this should be reopened.*
80. A survey was used to seek the views of children and young people about their schools. Surveys were sent to the schools directly affected by the proposals and teachers were asked to help children to respond. The local authority speech and language team also invited a number of pupils attending secondary mainstream schools to respond.
- *All the responses reflected the children's positive feelings about their school and the support they receive.*
 - *The written or scribed responses from Meadowbank pupils reflect their positive experience of the school and in many cases the children record that they do not wish the school to close.*
81. A petition with 3078 signatories was received by the Council, opposing the closure of Meadowbank School.
82. 122 response forms were submitted opposing the proposal and expressing the view that Meadowbank School should not close.
83. Other responses from members of the public include the following points:
- *The Court Special School would benefit from better accommodation. If Meadowbank School closes, the Council should consider transferring the The Court School there.*
84. Responses were also received from Councillors, the Liberal-Democratic Group, local AMs and MPs, opposing the proposal to close Meadowbank. Their responses included the following points:
- *A recent research paper from Cambridge University argues that special schools remain a valid part of the education mix. The findings suggest that especially for children with severe learning difficulties (SLD), special school provision still plays an important role.*
 - *The belief of Afasic, the charity for adults and children with specific language disorders, in the effectiveness of special school provision provides expert endorsement of a special school model in the appropriate circumstances.*
 - *Concern that the stated demand for "inclusion" may be driven by financial considerations rather than pupils' needs.*
 - *Children should not transfer to mainstream schools before they are able to learn the necessary communication skills to successfully integrate with their peers.*
 - *The loss of expertise which the closure of Meadowbank would entail.*
 - *Concern is expressed regarding the capacity of mainstream schools to support a wide range of needs.*

- *If Meadowbank were retained for speech and language, then redesignating Allensbank for ASC would be a positive move. If the Allensbank pupils transferred to Meadowbank, this would bring the school to capacity.*
- *Speech and language impairment is a lifelong condition that cannot be resolved in a short term placement of twelve months.*
- *The proposals state that the EICs will not have any impact on standards in mainstream, but they will surely impact on the host schools.*

Appraisal of views expressed by staff, parents, pupils and other stakeholders

85. The views expressed are noted.
86. A response to the view that there is an ongoing need for specialist provision for speech and language is set out in paragraph 26.
87. The assertion that parents are not informed about Meadowbank School is addressed in paragraph 48.
88. A number of respondents express the view that the Council should actively encourage parents who have named a mainstream school, to consider a place in Meadowbank School. The Council view is that such an approach would be contrary to the statutory responsibilities set out in the Education Act 1996, and the SEN Code of practice. Section 316A of the Education Act 1996 specifies that children with special educational needs should normally be educated in mainstream schools so long as this is compatible with receiving the special educational provision that their learning difficulty calls for; the efficient education of other children, and the efficient use of resources. This is also reflected in the Special Educational for Needs Code of Practice for Wales.
89. The Council is confident that there are effective processes in place to monitor the progress of children in mainstream, and ensure support is effective. However, in response to the concerns expressed by some respondents, that there may be children in mainstream schools who are not making sufficient progress and for whom specialist placement would be appropriate, the Council will request the specialist speech and language team and the UHB therapy service to undertake a review of the mainstream caseload.
90. The Day Class was funded by a Welsh Government grant which ceased in 2012. The Council continues to fund an outreach service to support pupils with speech and language needs in nursery settings and has supported the development of universal screening in Reception to ensure needs are identified and met early.
91. The speech and language specialist service is a team of 8, comprising 4.6 teachers, 3 specialist teaching assistants and an education- employed therapist who works in both the speech and

language team and behaviour support team. The speech and language team works collaboratively with speech and language therapists to support a shared caseload.

92. The Council rebuts the notion that the proposal is a cost-cutting exercise which will reduce provision for children with special educational needs. The proposal aims to reshape specialist provision in response to changing patterns of need. The majority of children with severe speech and language needs are well supported in mainstream schools and making progress there. Very few parents are requesting a specialist placement for a speech and language child. However, there are growing numbers of children experiencing behaviour emotional and social needs, for whom there is insufficient provision. If the proposal were progressed, resources released through closure of the special school would be reinvested in alternative SEN provision and support.
93. The criteria and purpose of EICs is clarified in paragraph 25.
94. The suggestion that The Court Special School could be transferred to the Meadowbank site is noted but is outside the scope of this consultation.
95. The research supporting the continued importance of special school places to support pupils with severe learning difficulties (SLD) is noted. The definition of SLD or 'severe learning difficulties' is a low cognitive ability or low IQ, resulting in severely impaired understanding and ability to learn. The Council maintains a range of special school and SRB places for children with severe or profound learning difficulties, including Ty Gwyn, Woodlands and Riverbank Special Schools and the SRBs at Llanederyn, Llanishen Fach, Bryn Hafod and Marlborough Primary Schools and the Council accepts the point that special schools are an important part of the range of inclusive provision for children with low cognitive functioning.
96. In contrast, Meadowbank Special School and Allensbank SRB are designated for pupils with specific language impairment (SLI), which is defined as a disorder in the development of language, despite adequate intelligence and opportunity and in the absence of any associated disorders that may underlie the language difficulties, such as hearing loss, autism or learning disability. While SLI is a lifelong condition and may range from 'moderate' to 'severe', it is distinct from a 'severe learning difficulty' or SLD.
97. SLI is acknowledged to be a lifelong condition which would continue whatever support or placement is provided, whether this is in mainstream or a specialist placement. The aim for supporting a child with SLI in any setting is to enable them to develop strategies and skills to manage their impairment and fulfil their potential.
98. The endorsement of Afasic for a special school model for speech and language is noted. However, a range of alternative models are

described positively by specialists, including the views of the Royal College of Speech and Language Therapists, summarised in paragraph 61, which describes a mainstream model of support, with 'sufficient specialist resource bases with the philosophy of short-term intensive support with the outcome of returning to mainstream education'.

99. A response to the concerns expressed about a loss of expertise is set out in paragraph 25.
100. The suggestion that if Allensbank SRB pupils transferred to Meadowbank this would bring the school to capacity is noted. However, this would not address the falling roll at both settings, as illustrated in paragraph 26.
101. The consultation document notes that establishing the EICs would not impact on standards. The pupils attending the classes would be dual registered and their learning outcomes and other data would continue to be recorded at their local school. There would be no impact on the data of the host school.

Summary of views expressed during the consultation and proposed way forward

102. The initial proposal set out a significant reshaping of specialist provision to respond to the changing pattern of special educational needs and the increased capacity of mainstream schools to support special educational needs.
103. The proposed reshaping would maintain the current level of investment in specialist provision and support for special educational needs, while ensuring a better fit to the current pattern of need.
104. There has been an ongoing gradual decline in the number of parents who request a specialist speech and language placement for their child, which has resulted in a steady fall in the number of funded places over many years, from 70 places prior to 2006; to 58 places in 2010, and to 34 places in November 2015.
105. The Council has responded to this shift in expectation by investing in mainstream support over several years. Work to build capacity for speech and language support began in 2010 and remains ongoing. The Council believes the fall in demand/ need for specialist places is a direct result both of parental expectations for mainstream inclusion and the capacity building work that has been done to meet needs more effectively in mainstream.
106. Alongside the changes affecting speech and language provision, there has been an increased demand for specialist provision for children with special educational needs such as autism spectrum conditions and behavioural emotional and social needs.

107. ESTYN recognised the rationale for responding to these pressures in its proposals for re-shaping provision by closing Meadowbank School, redesignating the SRB at Allensbank for ASC and developing a network of Early Intervention Classes.
108. In relation to support for speech and language needs, many respondents acknowledged the effectiveness of the work that has been undertaken in recent years to build capacity and skills in mainstream schools. This work has included a comprehensive training programme; universal early screening for speech and language needs; and a collaborative working relationship between Cardiff and the Vale UHB Speech and Language Therapy Service and the Specialist Teacher Service.
109. There is also a general acknowledgment among respondents, of the need for some change in the pattern of provision to support speech and language needs.
110. However, there is a strong consensus among stakeholders regarding the importance of continuing to maintain an effective range of specialist support for children with speech language and communication needs, and concerns that the proposal does not yet fully address this issue.
111. In particular, strong views have been expressed regarding the need to retain some designated specialist provision for children with the most severe speech and language needs.
112. Some respondents express the view that special school places should continue to form part of the range of specialist provision. Other respondents put more emphasis on the need for early intervention in the form of resource bases.
113. Given the strong views expressed by stakeholders it is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.
114. In developing a revised proposal, the relative benefits and costs of SRB and special school provision will need to be borne in mind. There is evidence to suggest that SRBs are a more efficient and effective means of delivering short-term or part-time support. The cost of an SRB place is between one third and one half the cost of a special school place, while the mainstream location of SRBs offers additional benefits for children of ongoing contact with mainstream peers and learning experiences.
115. In relation to support for behavioural emotional and social needs, many respondents acknowledged the growing demand for specialist provision for children presenting with behavioural emotional and

social needs, and recognised that there are insufficient specialist places available to meet this need at present.

116. The Council agrees with this analysis and this factor was key reason for the proposal outlined.
117. However, there is not yet consensus about the criteria and purpose of Early Intervention Classes. Further work is therefore needed to clarify and develop this aspect of the proposal prior to bringing forward a revised proposal for consideration.
118. The initial proposal to develop a network of Early Intervention Classes was based on a reinvestment of the resources and skills that would be released by closure of Meadowbank School. In the absence of significant new investment, it would not be possible to proceed with these classes while also retaining Meadowbank School.

Reason for Recommendations

119. The consultation has identified a number of views that are significant concerns for stakeholders. It is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.

Financial Implications

120. There are no direct financial implications of a decision to carry out further review and engagement and the subsequent development of revised proposals as recommended in this report. However any revised proposals developed would need to be subject to detailed financial implications as part of future Cabinet reports.
121. Meadowbank School is currently operating within its delegated budget, which, for 2016/17, totals £641,710. In addition, the school has been able to maintain a surplus balance despite falling pupil numbers. The surplus balance at 31 March 2016 was £65,774. However, should pupil numbers continue to fall, the school's ability to operate within its delegated budget would need to be considered as part of any financial implications of future decisions around the future of the school.

Legal Implications (including Equality Impact Assessment where appropriate)

122. Section 316A of the Education Act 1996 specifies that children with special educational needs should normally be educated in mainstream schools so long as this is compatible with receiving the special educational provision that their learning difficulty calls for; the efficient education of other children, and the efficient use of resources. This is also reflected in the Special Educational for Needs Code of Practice for Wales.

123. Parental preference refers to the obligation under section 86 of the School Standards and Framework Act 1998, which requires a local authority to make arrangements enabling the parent of a child to express a preference as to the school at which they wish education to be provided for his child and to give reasons for his preference. The preference expressed must be taken into consideration in relation to the statutory assessment process when statements of special educational needs are prepared. However, the type of provision will also be based upon the professional advice given and is individual to each child according to their needs.
124. Any proposal to establish a community school or to discontinue a community school and to make changes to special educational needs provision at a school may be considered as a regulated alteration to a school under Sections 41 and 43 of the School Standards and Organisation (Wales) Act 2013.
125. Section 48 of the 2013 Act requires that any proposal in respect of a regulated alteration regulated alteration must first be consulted upon and then a formal notice published in accordance with the Schools Organisation Code.
126. Under the Code the Authority is required to take into account certain factors in formulating proposals and those factors are referred to in the text of this Report.
127. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics.
128. Protected characteristics are:
- Age
 - Gender reassignment
 - Sex
 - Race – including ethnic or national origin, colour or nationality
 - Disability
 - Pregnancy and maternity
 - Marriage and civil partnership
 - Sexual orientation
 - Religion or belief – including lack of belief
129. The information from the consultation process will need to feed into an Equality Impact Assessment. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty.

130. The Cabinet must make a final determination of the proposals after any statutory notices are published, an objection period of 28 days is allowed, within 16 weeks of the end of the objection period.

HR Implications

131. At this stage there are no direct HR implications arising from the recommendations in this report. It is important that all schools based staff who were potentially affected by the original proposal are informed of the outcome of the consultation process.
132. The implications for employees arising from the review of speech and language support; considerations around early intervention for behavioural, emotional and social needs; and any future revised proposal in relation to Meadowbank and Allensbank schools, will need to be fully considered.
133. With regard to Meadowbank Special School, the budgetary impact of falling pupil numbers has meant that the Governing Body has had to take decisions to reduce its staffing levels from 1st September 2016. It is anticipated that falling pupil numbers will lead to further reductions in staffing levels.

RECOMMENDATIONS

The Cabinet is recommended to authorise the Director of Education and Lifelong Learning, in consultation with the cabinet Member for Education, to;

1. Carry out a further review of speech and language support in Cardiff with the aim of bringing forward revised proposals;
2. Undertake further engagement with schools and other stakeholders in relation to early intervention for children with behavioural emotional and social needs;
3. Work with the governing bodies of Meadowbank and Allensbank Schools to ensure the needs of children with speech and language needs placed at the schools can continue to be met effectively, pending any revised proposals.

Nick Batchelar
Director

The following appendices are attached:

Appendix 1 – Consultation document
Appendix 2 – Formal responses
Appendix 3 – Statutory Screening Tool