

Estyn response to the proposal for school organisation in relation to specialist provision for pupils with special educational needs (SEN) in Cardiff

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia which deliver school improvement services to the schools within the proposal.

Introduction

The proposal is by Cardiff Council.

The proposal is to:

1. Close Meadowbank Special School at the end of the academic year 2017. In consultation with parents, the 11 remaining pupils would be offered places at Allensbank Specialist Resource Base (SRB) or in a mainstream local school with funded support.
2. Continue to maintain a Specialist Resource Base (SRB) at Allensbank 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.
3. Continue to maintain a Specialist Resource Base (SRB) at Fairwater but cease admission of pupils with statements for behavioural, emotional and social difficulties. Redesignate this as an Early Intervention Class from September 2018.
4. 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.
5. Identify four additional primary schools (one in Welsh medium sector, three schools in English medium sector) in various locations across the city, to host Early Intervention Classes. Consideration will need to be given to availability of suitable accommodation and distribution of schools across the city. Further consultation with named schools will be needed before a final decision could be reached.

Summary/ Conclusion

It is Estyn's opinion that the proposal is likely to at least maintain the educational outcomes and provision for pupils in the area.

Description and benefits

The proposer has given a clear rationale for the proposal that responds to the falling demand for speech and language places and the increased demand for provision for other areas of special educational need. The proposer clearly outlines its Additional Learning Needs (ALN) Strategy, which sets out the principles and high-level actions for developing SEN provision through School Organisation Planning.

The proposer clearly defines the reasons why Meadowbank Special School should close, for the re-designation of existing SRBs and for the identification of additional primary schools to host Early Intervention Classes, including one in the Welsh medium sector. It clearly and fairly considers the benefits and potential disadvantages of the proposals. The benefits include ensuring that mainstream education can effectively support children with speech and language difficulties, that the graduated response to SEN will be strengthened, and that there will be an increased number of SRB places for children with complex learning difficulties and Autism Spectrum Conditions. In addition, there will be increased provision in the Welsh medium sector. Potential disadvantages include the small number (11) of younger pupils currently attending Meadowbank Special School would be affected by the school closure, as they would need to transfer to an alternative school. However, the proposer considers reasonably that there would be sufficient time to plan and support a transition to ensure as much consistency as possible.

The proposer has included a clearly defined list of options and risks associated with the proposal. These appear to be reasonable and focus mainly on the potential failure to secure sufficient growth to meet the increasing demand for children with additional needs. The proposer has considered suitable alternatives, including keeping Meadowbank Special School open, but gives good reasons as to why this has been discounted. It points to the view that while Special School continues to be an important option for some children with complex, long term learning difficulties, there has been a growing national (UK) trend for children with moderate learning delays, speech and language difficulties and physical disabilities to attend a local school. It maintains that Cardiff also reflects this trend.

The school currently has 23 pupils on roll compared to the current published capacity of 40. The overall building condition is categorised as satisfactory based on the Welsh Government's assessment of building condition.

The proposer has set out the pupil projections year on year until January 2020. These are very low. The proposal would reduce the number of special school places available. However, this is not expected to impact on access to or the quality of provision available. It anticipates that the proposal would have no effect on the number of pupils on roll at Allensbank Primary, Fairwater Primary, Glan yr Afon Primary or Springwood Primary.

The proposer has clearly set out admission arrangements, including a consideration of how this might be impacted on by changes to the statutory framework proposed by the draft Additional Learning Needs Bill. Consideration is given to both the SRBs and the Early Intervention Classes. The proposer suggests that Individual Development Plans (IDPs) would determine admission to the SRBs and that placement in the proposed Early Intervention Classes would be through placement

panels, subject to agreement by parents/ carers. Placements would be temporary and the child would continue to be registered in their local school.

The proposer has considered the impact of the changes on learner travel and anticipates that once the full network of seven Early Intervention Classes is in place, they will operate on a locality basis, providing places for children within the neighbourhood and reducing the need for children to travel long distances to access specialist support.

The proposer anticipates that the proposal would have a beneficial impact on Welsh language as it would address the need for Welsh medium SEN provision. It has undertaken an Equality Impact Assessment that includes a consideration of impact upon people and communities whose language of choice is Welsh. It has concluded that these proposals would not adversely affect any particular group.

Educational aspects of the proposal

The proposer notes that Meadowbank Special School was last inspected in November 2013. The school's performance was judged to be good with prospects for improvement judged to be adequate. In December 2014, the school was judged to have made good progress and as a result was removed from the list of school required Estyn monitoring. The proposer does not give details of the categorisation by the regional school improvement consortium (CSC).

The proposer has included information about the performance of schools identified as potential recipients for Meadowbank pupils should there be a decision to close the school. This information includes their inspection outcomes and their national category. The information indicates that Allensbank is categorised as a red school and that its inspection outcomes are at least adequate.

Of the schools considered to house designated or re-designated Early Intervention Classes, three are categorised as red schools (schools in need of greatest improvement and in receipt of immediate, intensive support) and one as yellow school (an effective school that is already doing well and knows the areas it needs to improve). Their inspection outcomes are at least adequate.

In relation to standards, the proposer notes that there are no proposed changes in respect of mainstream education provision. Therefore, it is not anticipated that there will be any impact on the quality of standards of education or the delivery of the Foundation Phase and in each key stage of education at any of the schools.

The information suggests that should the proposal be implemented, it is likely that outcomes and provision for pupils in the area would improve or be maintained.

Phillips, Joanna

From: Sharpe, Sarah (AM Support Staff, David Melding) <Sarah.Sharpe@assembly.wales>
Sent: 15 March 2016 13:28
To: School Responses
Subject: Meadowbank Special School - Consultation Response by the Governing Body
Attachments: Meadowbank Consultation.docx

15th March 2016

Dear Sir/Madam,

Re: Meadowbank Special School

On 7th March the Governing Body met to receive a presentation from the Authority on its consultation document "Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural, Emotional and Social Difficulties", and to agree a response. After a full discussion it was resolved to oppose the proposal for the closure of Meadowbank Special School. The reasons for this decision are set out below together with the Governing Body's alternative proposal.

The Governing Body is deeply concerned that the school has not been involved in a meaningful and timely way in the development of provision for primary aged pupils with speech and language difficulties. The educational data on which the Authority has based its proposals is sketchy and must pass reasonable challenge if it is to be considered robust. We note that the evidential basis of the data quoted by the Authority has not been made transparent. It is particularly disappointing that key decision makers such as the Cabinet Member for Education, Cllr. Sarah Merry, have not visited the school. This has all combined to produce proposals that seem abrupt and lacking in strategic depth. The bald statement in the consultation document that the "option of keeping Meadowbank open as a speech and language special school has been considered however this is not considered viable" (p 20) indicates a rigid top-down approach that is not open to wider participation.

Closure of Meadowbank would end the Authority's outstanding record in providing a centre of excellence for primary pupils with severe speech and language difficulties. Meadowbank has been a great resource for the whole primary school sector in Cardiff and has successfully promoted integration. Most pupils who leave Meadowbank return to mainstream schools. This innovative approach has led to an effective balance between early, intensive intervention and longer term integration which has served pupils very well. The Authority's proposals to disperse the expertise at Meadowbank seems particularly ill judged. There is no plan to retain key skills in Cardiff which will surely put at risk the Authority's past achievements in speech and language needs provision. Here, the assertion in the consultation document that "Cardiff is the only local authority in England and Wales still maintaining a special school specialising solely in speech and language skills" (p4) is partial and unhelpful. In fact, many authorities maintain specialist

provision in some form. Yet Cardiff proposes to end specialist provision and this is surely risky as mainstream placements are unlikely to be suitable for all primary pupils with severe needs.

The apparent shift in parental preference is cited by the Authority as one of the main drivers in moving to a mainstream model for speech and language need provision. This change has been rapid and has resulted in a sudden fall in referrals to the school. We do not believe that this shift has been adequately explained. Is this a result of a change of preference based on full information and consideration of the range of options? Parents, staff and governors at Meadowbank are of the view that this abrupt change in parental preference has been guided to some extent by the Authority when providing information to parents seeking appropriate support for their children's speech and language needs.

The Governing Body is also concerned that the recently established (2014-15) school-based therapy service is not yet fully tested in practice. More information on the schools based model is required as there is a fear that it will be more generic and less suitable for pupils requiring intensive therapy.

Given the lack of specialist provision for speech and language difficulties, the Early Intervention Classes will focus on children with behavioural, emotional and social difficulties. These difficulties are sometimes experienced by pupils with severe speech and language difficulties, but it is not a common feature. That the future provision of speech and language needs provision and behavioural, emotional and social difficulties provision have been elided in this consultation is indicative of a flawed strategy.

Meadowbank Special School has a proven track record in responding to changing needs and preferences. It was once a regional school for primary and secondary pupils and had boarding facilities. It then became a day school only, then a primary school, and has developed a range of innovative approaches to promote integration and mainstreaming. We are disappointed that this tradition of improvement and innovation is not being further developed.

After careful consideration, the Governing Body thinks that a better approach for the development of speech and language needs provision in Cardiff would be to keep Meadowbank open, preserve its status as a centre of excellence, and to further develop its links to mainstream. This could be done in a number of ways:

- day classes
- short term admissions for intensive support
- longer term support for pupils not ready or suitable for mainstream
- centre of expertise for training teachers and other staff in mainstream
- provision of specialist speech therapy services

It is our hope that the Authority will act on our recommendations and withdraw its proposal for closure, and instead retain Meadowbank Special School as a centre of excellence.

Yours faithfully,

David Melding AM

Chair, Governing Body, Meadowbank Special School

RESPONSE TO 21st CENTURY SCHOOLS CONSULTATION DOCUMENT 2016

Specialist Provision for Primary Aged Pupils

Governors accept the evidence provided by the local authority in regards to the decrease in demand for speech, language and communication placements but feel that with Meadowbank closing, there is still a demand for specialist support which Allensbank could provide.

However, Allensbank is in a good position to accommodate a School Resource Base for pupils with Autism Spectrum conditions due to its friendly and accepting atmosphere and the fact that it is a feeder school for Cathays High School where such provision exists at Secondary level thus enabling pupils to make the Primary/Secondary transition alongside some already familiar faces.

Governors are concerned that:

- The period of transition should not result in mixed classes of either:
 - (a) Foundation stage and KS2 pupils or
 - (b) Pupils with Speech and Language needs and pupils with Autism Spectrum conditions.

In the case of (a), it would be detrimental to pupil inclusion if they were not placed within their peer group

In the case of (b), the needs of pupils with Speech and Language needs and pupils with Autism Spectrum conditions differ considerably and are to some extent conflicting.

- Staff working in the Resource Base should receive adequate and appropriate training **before** the period of transition or intake of pupils with Autism Spectrum conditions to ensure the consistency and continuity needs of these pupils. This will be negatively impacted if there is the disruption of frequent supply cover to facilitate training.
- Additional accommodation and training costs should not be funded from the school budget. The school will need to consider provision within a potential ASC resource base, not only in terms of resources but also the classroom learning environment. The current SRB classes are contained with one classroom for Foundation Phase and a second class for Key Stage 2. The school utilises all other teaching spaces and consideration would therefore need to be given to the appropriateness of the building for such provision.

Response to the Consultation Document *Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.*

The Governing Body of Fairwater Primary School does not support the proposal for the following reasons:

The proposal lacks a clear rationale both for the assessed need and the exact nature of the proposed change of provision. There is insufficient audit information on numbers of appropriately trained staff and likely distribution of children needing SRB places.

- Governors are concerned that provision for **individual** pupil needs is not clearly defined. The proposal reports that the focus group from March 2014 identified the need for greater emphasis on the underlying needs experienced by pupils with BES difficulties. It is not clear in the proposal whether this emphasis could be addressed within an overarching provision of Early Intervention Classes. Specifically Governors have a concern over the potential negative impact of catering for both pupils with Speech and Language Difficulties and BES difficulties in the same provision, given the serious level of BES difficulties currently catered for in Fairwater.
- It is not clear how the notion of 'Early Intervention Classes' will differ from 'Nurture Classes', particularly as staff are currently being trained in 'Nurture' provision.
- The proposal does not include sufficient information on costs or projected capacity building to provide appropriately trained teaching and non-teaching staff to support Early Intervention Classes.
- Governors are concerned that the current process of referring mainstream pupils with Speech and Language Difficulties was extremely complex and onerous and may be contributing to the fall in numbers. More seriously, there is a doubt over the capacity of the local authority to provide sufficient support for children with Speech and Language Difficulties in mainstream schooling.
- The proposal that children in Early Intervention Classes could be returned to mainstream within 3/4 terms is not supported by experience at Fairwater, where some children have remained in SRB for 6 years.

The Governing Body of Fairwater Primary School does not support the proposal to convert Fairwater Specialist Resource Base to an Early Intervention Class.

The Governing Body are fully committed to both inclusive education and to Welsh Government aims to reduce the impact of deprivation on achievement.

The reasons for not agreeing with this aspect of the Proposal relate to Governors assessment of the most appropriate strategic direction for Fairwater Primary:

1. The GB have been petitioning LA over several years for nursery provision at Fairwater and have recognized the following factors as supporting their case:
 - Acknowledgement from WG that indicators show that by the age of 5, children from deprived backgrounds can be as much as a year behind in their language and learning has been noted.
 - The fact that the 21st Century Schools Programme identifies the creation of nursery provision on primary school sites as one of the main priorities.

- The reporting by the Estyn Inspection in July 2013 that, on entry, many pupils at Fairwater had below expected levels of basic skills and maturity.
 - Fairwater Reception baseline assessment from 2016 indicating the significant number of stages needed to achieve the baseline
 - Comment from the Assistant Director at a Strategic Briefing Meeting in Autumn Term 2015 that Cardiff Council recognized the importance of investing in early years.
2. Fairwater has made significant improvement in raising standards over the past 18 months resulting in moving from Red to Amber categorisation, and the Estyn re-visit report of November 2015 assessing Strong Progress having been made on all five recommendations. The catchment area includes pockets of serious social deprivation and nursery provision is seen as necessary both to meet local social needs, and to ensure that the school continues to reduce the impact of deprivation by raising standards.
 3. In improving educational attainment at Fairwater, the GB believes it should be a first priority to address local needs. As far as the children currently in the SRB are concerned, only 2 out of 9 are resident in Fairwater. As far as the Proposal is concerned, it is noted that a 'Neighbourhood Approach' is being advocated, with the 7 EICs operating on a locality basis, reducing the need for children to travel long distances. However, given the current allocation at Fairwater, with children travelling from the other side of the city and as far as Gwaelod y Garth, it is difficult to see how there is anticipated need for pupils from the Fairwater area alone.
 4. Budget allocation for Fairwater currently shows a deficit in excess of £30,000 and at their meeting on 15 March 2016 the GB voted to commence a process of staff redundancy in order to reduce the deficit. GB are therefore conscious that strict budgetary control will continue to be necessary, and have a concern that there are periphery costs incurred by the current hosting of the SRB. In addition to the overheads relating to the accommodation, the school is not funded for supply cover to release teachers and teaching assistants for their specialist training, as in the recent example of training for the use of the BSquared Assessment Tool.
 5. At their meeting in May 2015, the GB felt it was important to have oversight of the long term strategic direction of the school. Since the rooms occupied by the SRB were considered by the LA to be suitable to for nursery provision, it was agreed to give notice of the intention to open negotiations to terminate the SRB at Fairwater. The GB further voted unanimously on 15 March 2016 to give formal notice to terminate the hosting of the SRB at Fairwater.

On behalf of the Governing Body
Fairwater Primary School
18 March 2016

Consultation period

The consultation period for these proposals starts on 11th February 2016 and ends on 23rd March 2016.

Within 13 weeks of 23rd March 2016 a consultation report will be published on the City of Cardiff Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees during the consultation period and provide the Council's response to these issues. The report will also contain Estyn's view of the proposals.

The Council's Cabinet will consider the consultation report and decide whether or not to proceed with the proposals.

If the Cabinet decides to continue with the proposals the City of Cardiff Council must publish a statutory notice.

Statutory Notice

The statutory notice would be published on the City of Cardiff Council website and posted at or near the main entrance to the school/sites subject to the notice. Copies of the notice would be made available to schools identified in the notice to distribute to pupils, parents, guardians and staff members (the school may also distribute the notice by email). The notice sets out the details of the proposals and invites anyone who wishes to object to do so in writing within the period specified.

Determination of proposals

The City of Cardiff Council Cabinet will determine the proposals. Cabinet may decide to approve, reject or approve the proposals with modifications. In doing so, Cabinet will take into account any statutory objections that it has received.

Decision notification

Following determination of proposals, all interested parties will be informed of the decision which will be published electronically on the City of Cardiff Council's website.

CONSULTATION RESPONSE FORM (SEN Provision 2016)

Consultation on specialist provision for primary aged pupils with Speech and Language Difficulties and with Behavioural, Emotional and Social Difficulties.

Your views matter, please tell us what you think about the proposal by:

- Completing and returning the accompanying questionnaire to the address given at the bottom of the form.
- Completing the on line response form www.cardiff.gov.uk/21stcenturyschools
- Or if you prefer you can e-mail your views to: schoolresponses@cardiff.gov.uk

Please note that all comments sent in writing or by e-mail must contain the full name and full postal address of the person making the comments.

The closing date for responses to this consultation is 23 March 2016. Unfortunately no responses received after this date can be considered by the Council.

Consultation responses will **not** be counted as objections to the proposals. Objections could only be registered following publication of a **statutory notice**.

Any responses received can be requested under the Freedom of Information Act and may have to be made public, however any information that would identify an individual such as name and address would be removed.

.....
[REDACTED]
.....
Date:

24/02/2016

.....
Your status: Parent Governor Pupil Member of Staff Other (please specify)
.....

1. Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

Yes

No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

2. Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

3. Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture Class to Early Intervention Classes?

Yes No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

As a Governor for Glan yr Afon school, I support the EIC proposal but our school suffer severely from having older 4r 5/6 high tariff pupils there. I support the proposal providing we have the ability to negotiate the age and severity of the pupils we accept.

4. Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools).

Yes

No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

Thank you for your comments

Please tick the box below if you wish to be notified of publication of the consultation report

Please return this form to the School Organisation Planning Team, Room 422, County Hall, CF10 4UW by 23 March 2016.

From: Boyle, Joe (Cllr)
Sent: 06 April 2016 10:52
To: School Responses
Cc: Hoffer, Pat
Subject: Springwood Primary School - Response to SLD consultation

Hello,

I am submitting this response to the consultation on specialist provision for primary aged pupils with speech and language difficulties and with behavioural emotional and social difficulties on behalf of the governing body at Springwood Primary School, where I am chair of governors.

Governors received a presentation from council officers on 17th March and discussed their position subsequently.

We have restricted our comments purely to the issue of changing the nurture class currently operating at Springwood into an Early Intervention Class (EIC). We have chosen not to make any comment on the plans for Meadowbank, Allensbank or the other schools identified as a possible base for an EIC.

1. Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

n/a

2. Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

n/a

3. Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture Class to Early Intervention Classes?

No

The context for our comments is important. Springwood opened its nurture class in January 2014. This came little more than a month after we were first approached by the local authority, shortly before Christmas in 2013. Opening the class at such short notice caused some concern and even led to a resignation from the governing body. However, it was felt this was an important step for the school and that we had the capacity to help the local authority at a moment of need.

We also felt able to make the move because the remit of the nurture class was relatively tight, in terms of the children we would be hosting, the challenges they presented with and their young age.

The nurture class was a success and contributed to the school's growing reputation for inclusivity. In fact, this success allowed us to embrace the opportunity to open an autism resource base with confidence. The SRB opened in September 2014 and is now a vital part of our school.

One final piece of context is important. Shortly before the Easter holidays, the local authority's school organisation team met the headteacher and chair of governors to discuss the school's 'footprint'. The strong message we were sent was that the school has too much space for the number of children on roll. It appears likely that the local authority will therefore requisition a large part of the upper floor for use by other council-run organisations. This means we will be operating with a much reduced space.

With this context established, governors feel they cannot at present support the location of an EIC at Springwood for the following reasons:

- A lack of clarity about the nature of the children the EIC will host: the broad range of behavioural challenges they will present with; the diagnoses they will come with; their age; the remit of their individual development plans.
- Uncertainty about the school's role in deciding which children to admit. We are uncomfortable that the panel of headteachers and staff that will make this decision would not include input from the school's senior leadership or governors.
- Concern that the reduced amount of space that the school will have following the SOP review might impact on our ability to accommodate the EIC safely.
- Concern that the mix of children with autism (from our SRB) together with children presenting with complex emotional and behavioural difficulties could be difficult to manage. We do not want to see the success of our SRB compromised by introducing children to the school with a further range of complex needs.

While we have reservations about the proposals as outlined in the consultation, Springwood governors will nonetheless give serious consideration to using the space currently allocated to the local authority nurture class to housing its own nurture class. We understand the authority is supportive of schools running their own nurture classes and have identified a clear need in our school for such provision. We are supportive of early intervention strategies which will enable vulnerable pupils to develop the skills and attitudes they need to become successful and well-adjusted young people and adults in the future.

4. Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools).

n/a

We hope these views will be taken into consideration.

Regards,

Joe Boyle (Chair of Governors, Springwood Primary School)
Councillor – Penylan
029 2046 2187

ROATH PARK
PRIMARY SCHOOL



YSGOL GYNRADD
PARC Y RHATH

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E-mail roathparkprm@cardiff.gov.uk

Headteacher C J Skinner (B.ED HONS)

29th January, 2016.

Dear Nick,

I am writing on behalf of Cardiff primary headteachers to express our collective concern in response to the consultation on the proposed closure of Meadowbank Special School and the Speech and Language Resource Base at Allensbank Primary School.

In the report which was presented to Cabinet on 3rd December 2015, the reason for the report is identified as "the falling demand for speech and language places and increased demand for provision for children with behavioural social and emotional needs." As a body, we have serious concerns about this statement and the potential loss of this expertise within the city.

Whilst we acknowledge that provision for supporting speech and language within mainstream schools has improved significantly in recent years following the introduction of Speech and Language Link programmes in schools and the more recent introduction of Speech Therapy Services into schools, we do find the statement that "demand for places at Meadowbank and Allensbank SRB has fallen in recent years" to be very surprising. The provision for children with less complex needs has certainly improved significantly within our schools but it still remains a challenge to meet the needs of the most complex children. It is the experience of many Headteachers that statement requests for pupils with complex SLC needs have been turned down much more readily in recent years. This correlates directly with the fall in demand for places which is identified within the proposal.

We are also concerned that the obvious link between poor speech, language and communication skills and challenging behaviour seems to be completely overlooked within the proposal. In a report published by the Royal College of Speech and Language Therapists in August 2015, they identify over 70% of young offenders with significant speech, language and communication difficulties. They state that many of these young people lack the language skills to understand what is happening to them in the justice system and are unable to access the rehabilitation programmes which are on offer to them. As primary headteachers, we are able to clearly identify pupils in our schools at the present time who are exhibiting challenging behaviour but whose underlying issues stem from speech, language and communication difficulties. These can be masked when behaviour is extreme and we have no doubt that the percentage of pupils with underlying SLC difficulties in The Court and Greenhill Schools is disproportionately high. We would like much greater emphasis on speech, language and communication assessments for children whose overt primary need comes across as behavioural.

We know that the proportion of NEEI young people across the city continues to present a significant challenge for the council. The potential NEET pupils of the future are already identifiable in primary schools and many of these display significant difficulties with speech, language and communication. Early intervention is crucial and the skills of highly trained staff in specialist environments is often the most effective way of securing the best outcomes for these learners.

The historical picture shows that the prospects for pupils with speech and language difficulties to be reintegrated into mainstream school from Meadowbank and Allensbank SRB are good. This implies that the high quality of teaching that they have received during their time in specialist provision has made a long lasting impact on their speech, language and communication skills and enabled them to access their high school education in a mainstream setting. As far as we are aware, this is not the case for any other specialist provision within the city.

Yours sincerely,

Colin Skinner

(Vice Chair Cardiff Primary Headteacher Conference)

Copy to: Rosalie Phillips.

CONSULTATION RESPONSE FORM (SEN PROVISION 2016)

Your Name: Lorraine Felstead

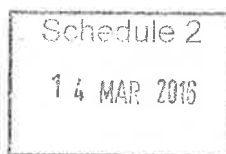
Address: Meadowbank School

Postcode: CF14 2QQ

Date: 10 March 2016

Your status: Parent Governor Pupil Member of Staff

Other (please specify)



1. Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

Yes

No

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

All children need language to learn, develop their literacy skills, get on with others, manage their behaviour and develop emotionally. Children with severe and profound speech and language impairments (SLI) require a small class setting, experienced teaching staff that understand speech and language difficulties, specialist resources and specialised teaching approaches and strategies. Meadowbank School is a centre of excellent that provides all of the above. It is an invaluable resource that effectively supports the needs of children with SLI. SLI impacts on all areas of a child's learning and on their future prospects and social outcomes. Attending Meadowbank School ensures that children have an effective start to their education that often leads to them being successfully re-integrated into a mainstream school.

The data contained in the consultation document aims to show that children with SLI in mainstream classes make progress and that their needs are being met. However, the data presented is sketchy and is not sufficiently robust for this assumption to be made.

The Local Authority states that parental preference is one of the main reasons for the lack of referrals to the school. However, staff, governors and parents believe that parental preference has been guided away from specialist provision by the Local Authority. As a result of the lack of referrals to the school the 'option of keeping Meadowbank open as a speech and language special school has been considered, however this is not considered viable' (p 20 of the consultation document). This statement shows that the Local Authority is planning to close Meadowbank School whatever the outcome of the consultation.

Closing Meadowbank School will 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.

If Meadowbank School closes and Allensbank School's SRB becomes a provision for children with ASC there will be no specialist provision for children with SLI from September 2018 in the capital city of Wales. All other Local Authority's in Wales have some form of specialist provision for children with SLI.

I strongly believe that Meadowbank School should remain open so that a centre of excellence is preserved. The expertise at the school can continue to effectively meet the needs of children with the most severe and profound SLI and also for the expertise at the school to be used in supporting staff and children in mainstream schools.

This could be achieved in a number of ways:

- Setting up a 'revolving door' day class for children who attend on a part-time/short time placement in order to access intensive support for a limited time.
- Longer term placements for children who need extensive support and a specialist placement and whose needs cannot be met in a mainstream class.
- Extending the early years outreach provision to include children in reception classes.
- Providing specialist speech and language therapy.
- Developing a centre of specialist SLI professional development for teachers and support staff in mainstream schools

2. Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes No

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I agree with this proposal as there is an increased demand for specialist provision to meet the needs of children with Autism Spectrum Conditions.

Allensbank's SRB is currently cited as an alternative to Meadowbank School as it can provide mainstream opportunities/experiences for children who need them. However, I believe that Meadowbank can provide these opportunities and experiences more effectively by providing this provision in a child's own local mainstream school. This enables children to maintain

links with their friends who they live near and to be part of a supportive peer group as they move onto secondary school.

3. Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture Class to Early Intervention Classes?

Yes No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I agree with this proposal as there needs to be consistency across the Local Authority if Early Intervention Classes are to be established.

4. Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools)?

Yes No

If you **do not** support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I agree with this proposal. However, the Local Authority needs to consider the following points to ensure that this provision is set up effectively to meet the needs of children who are identified as requiring access to an Early Intervention Class.

- There needs to be clear admission/entry criteria.
- There needs to be a transparent admission process.
- The combination of need and age.
- The location of the classes - some areas of Cardiff may require this provision more than others.
- There needs to be experienced and trained staff in the classes.
- There needs to be a nominated person in the Local Authority who has overall responsibility of the classes to ensure that there is consistency of practice between the classes and the above points are all addressed.

Thanks you for your comments

Please tick the box below if you wish to be notified of publication of the consultation report.

Please return this form to the School Organisation Planning Team, Room 422, County Hall, CF10 4UW by 23 March 2016

MB16/242

Headteacher
Moorland Primary School

Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

No

If you do not support the proposal, please give your reasons together with any changes or alternatives that would like to suggest.

I think the loss of this specialist provision would have a negative impact on provision for children with the most complex SLCD. Whilst Language Link has had a very positive impact on the Speech and language development of the majority of learners, the most complex children still benefit from a specialist setting where every member of staff is a SLCD expert. I am aware of at least 2 SLCD referrals for statutory assessment in the last 12 months that were both turned down so it is misleading to say there have been no recent referrals. I believe that the majority of pupils who have ESBG statements will also have SLCD, often unidentified as it may have been masked by extremely challenging behaviour. Current research shows that 70% of young offenders have SLCD. It would be beneficial to explore whether ESBG/SLCD provision could be developed in Meadowbank in order to try and address the growing ESBG needs across the city.

Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes but only if SLCD provision was still available at Meadowbank

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture class to Early Intervention Classes?

Yes but I have concerns that the needs of the pupils in these classes will be too broad. It is also difficult to imagine what would happen to children who appear in the system when all the places are taken up for 3-4 terms at a time.

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools)

Yes but there would need to be an equitable system across the city, recognising that the demand/threshold in some areas will be much higher than others. The funding must be directly linked to the children with the most complex needs and not to the areas where the parents shout the loudest.

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

MB16/242

Headteacher
Springwood Primary School

Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I would like to extend the use of Meadow Bank school, particularly to address the shortage of places for pupils with behaviour issues. I am concerned that with the increase in population in Cardiff that we may be too quick to close this resource.

Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture class to Early Intervention Classes?

No

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I do not believe that it is a good idea to mix together pupils who are not coping in a mainstream class due to issues with behaviour, speech and language, communication. The pupils who have been referred to the Nurture class, were referred because their placement in the mainstream school had broken down. When this happens negative behaviours tend to be displayed, the atmosphere within the group is very fragile and can be stressful. I would suggest that this is not appropriate for pupils who are quiet and withdrawn due to communication and possibly Nurture/attachment issues. I also think that the EIC classes need to have a set age range that each EIC accepts. The needs of Ks2 pupils is very different to FP, the staff will need to have different skill sets, I think we are expecting too much of the staff.

Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools)

No

If you do not support the proposal, please give your reasons together with any changes or alternatives that you would like to suggest.

I would not like one of these classes at Springwood. As stated previously I think it is fundamentally wrong to put these children together in one class, and label it as an EIC and not a behaviour class. Currently there is not enough support in the system for pupils who are displaying negative behaviours and I do not agree with the assumption that most of these behaviour issues are linked directly to speech and language difficulties, it is far more complex than that.



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Bwrdd Iechyd Prifysgol
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Children's Speech & Language Therapy Therapi Iath a Lleferydd Plant

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Date: 1st April 2016

Please find below, comments regarding the *Consultation Document 2016: Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties*. This is a team response from Cardiff & Vale UHB Children's Speech and Language Therapy Service:

1. Cardiff and Vale UHB SLT Service to local primary and high schools:

Cardiff and Vale UHB Children's Speech and Language Therapy Service has developed a very positive collaborative working relationship with Cardiff LEA in recent years, and as a result there have been many joint initiatives and projects including setting up a mainstream speech and language therapy service to local primary and high schools. This was set up in response to:

- Guidance from RCSLT that all school aged children with SLCN should be offered speech and language therapy in school (RCSLT Clinical Guidelines)
- Feedback from parents and schools that they would prefer services delivered in school
- A need to provide equity for children requiring Speech and Language Therapy in different educational environments
- Concerns raised by SLTs, schools and other health professionals about children who had a recurring discharge and re-referral pattern due to non-attendance.

We have a number of concerns about the Consultation Document's references to the Cardiff and Vale UHB Children's SLT Service and in particular the pilot project to deliver services to local primary and high schools for all children with SLCN. These are:

- The SLT mainstream school service was not set up to replace specialist provisions for children with severe SLCN.
- This is currently a pilot project. It has not been evaluated and therefore no conclusion has been reached on the future of this aspect of the Children's Speech and Language Therapy Service. Whilst the project has been well received in most schools and by most parents, there have been some challenges including: concerns around consent, increased travel costs and a reduction in the number of children that staff can be seen in a day.

As a team, we are concerned that information has been included in the document and comments made in the press regarding the way in which our Speech and Language Therapy Service is running at present. This was included without

discussion or consultation with anyone from Cardiff & Vale UHB Children's Speech and Language Therapy Service;

2. Clinical risks of the proposals for children with severe, specific speech and language difficulties

We acknowledge that there has been a fall in demand for places in Meadowbank and Allensbank in recent years as a result of parental choice and an improvement in the capacity of local schools to deliver speech and language interventions. However if these proposals are implemented, there will be no specialist provision for children with severe and complex speech and language difficulties in Cardiff. Whilst we agree that many children with speech and language difficulties can be managed within mainstream school settings we have significant concerns that there will be no specific and specialist provision for:

- the small percentage of children that require short-term, specialist, intensive speech and/or language intervention in the Early Years. The proposals laid out in the consultation document that describe the Early Intervention Classes (8a, 8b, 8c, 8d) sound like a suitable proposal for managing many different needs, however they do not appear to include the needs of children with severe specific speech and language difficulties. It is unclear in the document what the difference is between the current 'nurture classes' and the proposal for the 'Early Intervention Classes'. Early intervention is the key to positive outcomes for children with speech and language difficulties.
- those children that 'fail' within their local school despite a high level of support both within the classroom and from external specialist services such as SLT and the SLCD specialist teacher team.. These children are extremely vulnerable to mental health difficulties and at risk of exclusion.

Research shows that children with significant language impairment are at a high risk of behavioural difficulties (*Tomblin, Zhang, Buckwalter & Catts, 2000; Carson et al, 1998*), mental health problems (*'Let's Talk About It' – The Communication Trust, 2011*) and of becoming offenders in adolescence and adulthood (*Tomblin, 2000; Bryan, 2004*). Self esteem, emotional health and wellbeing are impacted upon significantly and often have the consequence of affecting social acceptance (*Botting & Conti-Ramsden, 2000*)

3. The capacity of local schools to deliver specialist interventions

The SLTs who deliver services to children with SLCN in their local schools have identified a number of concerns around the capacity of mainstream schools to deliver highly specialised interventions to the most needy children (service level 5):

- Mainstream staff have significant difficulties implementing a specialist strategy or approach within a busy mainstream class of 30 pupils
- It is often not possible for schools to allocate a named member of staff to work with the Speech and Language Therapist and the child between the Speech and Language Therapist's visits.

- There are significant gaps in the knowledge of mainstream school staff to support these children with the most significant levels of need..

If the proposal to close Meadowbank School and re-classify Allensbank SRB proceeds, there will be a number of teachers and support staff with significant knowledge and experience of supporting children with severe communication difficulties available to help with these challenges.

4. Measuring outcomes

The document suggests that the Local Authority and schools are relying very heavily on the use of *Speech Link* and *Language Link* to measure outcomes for children with SLCN. Whilst these outcome measures are undoubtedly useful for many children with mild and moderate SLCN, we would urge a note of caution. It should be noted that *Language Link* and *Speech Link* are screening tools only. They do not provide a comprehensive language or speech sound assessment. In particular, *Language Link* screens a limited range of comprehension skills and it does not address expressive language skills at all. *Language Link* is not a reliable outcome measure for children with severe and complex language difficulties.

5. Redesignation of Allensbank SRB as an ASD provision

We acknowledge that there is an increased demand for specialist educational placements for those children with ASD. However, our current experience of working in Allensbank Primary School and SRB raises some concerns about being able to create a suitable environment for children with ASD. For example, having enough suitable space to create 'quiet' or 'sensory' areas, when space is already at a premium in the school.

Cardiff & Vale UHB Children's Speech & Language Therapy Team



RCSLT Response to 21st Century Schools Consultation Document 2016
– Specialist Provision for Primary Aged Pupils with Speech and
Language Difficulties and with Behavioural, Emotional and Social
Difficulties

The Royal College of Speech and Language Therapists (RCSLT) is the professional body for speech and language therapists (SLTs), SLT students and support workers working in the UK. The RCSLT has 15,000 members (450 in Wales) including around 88% of SLTs working in the UK. We promote excellence in practice and influence health, education, care and justice policies.

Approximately 70% of SLTs registered in the UK work with children. It is estimated that approximately 6-8% of children aged between 0-11 years have speech, language and communication needs. The prevalence for children with severe and complex needs may be a further 1%.

In a key position paper on 'Supporting children with speech, language and communication needs within integrated children's services' RCSLT set out its view that there should be a focus on inclusion of children with special (or additional) needs in mainstream settings but that this should be balanced with a requirement for specialist services to be delivered flexibly in order to enable inclusion. Vulnerable children and those with additional needs form part of the population of 'all children'. 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.¹ 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.

We are aware that a great deal of positive work has been undertaken across Wales in recent years with regard to inclusive primary schools and specialist resource bases. 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. We would be happy to provide further examples if required.

¹ Gasgoigne, M (2006). *Supporting children with speech, language and communication needs within integrated children's services*. RCSLT:London.

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The Royal College of Speech and Language Therapists (RCSLT) is the professional body for speech and language therapists (SLTs) in the UK. The RCSLT has 18,000 members and support workers working in the UK. We provide (45% in Wales) including around 83% of SLTs working in the UK. We provide excellence in practice and influence health, education, care and justice policies.

Approximately 70% of SLTs registered in the UK work with children. It is estimated that approximately 6-8% of children aged between 0-11 years have speech, language and communication needs. The prevalence for children with severe and complex needs may be a further 1%.

In a key position paper on 'Supporting children with speech, language and communication needs within integrated children's services', RCSLT set out its view that there should be a focus on inclusion of children with special (or additional) needs in mainstream settings but that this should be balanced with a requirement for specialist services to be delivered flexibly in order to enable inclusion. Vulnerable children and those with additional needs form part of the population of all children. 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, where universal, targeted or specialist, locally and nationally wherever possible. In this response, RCSLT would wish to stress the need to ensure that children with speech, language and communication difficulties in Wales receive the services that they need, which include a high quality of specialist services, alongside universal provision.

We are aware that a great deal of work is being undertaken to ensure that children with speech, language and communication needs receive the services that they need, which include a high quality of specialist services, alongside universal provision.

Afasic CYMRU

voice for life
llais ar gyfer bywyd

Charity No. 1045617

**Cardiff Council 21st Century Schools Consultation Document 2016
Consultation on specialist provision for primary aged pupils with
Speech and Language Difficulties and with Behavioural, Emotional and
Social Difficulties.**

**Consultation
response form**

Your name: **Zein Pereira**
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Date: 5 April 2016

This response concerns the Cardiff Local Authority proposals to close all specialist speech and language provisions as part of the consultation on Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.

Our response is based on careful consideration of the consultation document and parental feedback received during face-to-face meetings and through questionnaires and written submissions in relation to this consultation. It is organised under ten key objections. In addition, Afasic Cymru will submit consultation responses from children and young people with speech and language needs.

These proposals seek to remove all speech and language specialist provision for children with severe speech and language needs in Cardiff by 2018. Afasic Cymru strongly opposes the proposed closure of Meadowbank Special School and the proposed change of remit of Allensbank School specialist resource base.

Key objections

- 1. These proposals contradict the principles set out by the Cardiff Council Additional Learning Needs (ALN) Strategy set out in 21st century schools consultation document 2016, page 9.**

In particular:

- 'All children should have access to an appropriate education that affords them the opportunity to achieve their personal potential.'
- 'Special Schools should function as Centres of Excellence'
- 'The interests of all pupils must be safeguarded.'

- 2. The proposals appear to suggest that children with severe and persisting speech and language difficulties do not benefit from or need specialist provision and therefore LA resources will no longer be organised and invested in this way for children with these needs.**

However, the Local Authority appears to recognise the value of a graduated approach that includes specialist provisions in their consideration of meeting the range of needs of children with ASD.

Children with severe speech and language difficulties also require access to a comparable spectrum of provision as part of the LA graduated response. These proposals deny this population of children access to a specialist placement that would deliver an "appropriate education that affords them the opportunity to achieve their personal potential," as stated above. Afasic Cymru is concerned that these proposals show a lack of understanding of the complexity and impact of these needs and could appear to be discriminatory.

There is plenty of evidence to show that children with severe and persisting speech and language needs do benefit from a specialist provision and that these benefits extend into all aspects of a child's life. Parental reports of outcomes in Meadowbank include accelerated progress and the building of confidence and skills to enable future achievement and attainment. There is also documented evidence of the benefits for children in specialist provisions as part of their annual review paperwork that will include professional assessment of levels of achievement.

Parents of children with severe speech and language needs, past and present, report that in spite of best efforts, the available support in mainstream was ineffective and their children began to thrive once they were placed in a specialised provision. Parents report 'fighting' for the right provision to meet their child's needs and we are concerned that this may worsen under these proposals.

From the consultation document, a placement at Meadowbank costs approximately £25,000 per year whereas a place in local primary school is approximately £3,600. This figure of £3,600 does not appear to take account of the variable costs of effective additional support and the costs incurred if support is not provided. Please follow the link to our Cost to the Nation poster <http://www.afasiccymru.org.uk/new-bilingual-poster/> for information about the essential nature of speech and language skills for life and work and the cost of untreated needs to the individual, the family and the nation.

Indeed it may cost considerably more for an out of county placement at a specialist speech and language provision in a neighbouring authority or even a residential place for example, at an ICAN school in England. We are concerned that these proposals may increase the likelihood of appeals to Tribunal. This would be extremely stressful and potentially costly for families as well as the Local Authority.

3. The proposals do not offer a full and fair picture of evidence.

The LA asserts that:

i) Parents of children with severe speech and language needs are making a fully informed choice about placement options.

Parents repeatedly tell us that the option of a specialist speech and language provision was and is not being properly mentioned as a part of the process of assessment and provision. Parents say that specialist provisions are kept "hush hush."

An example from a parent: "I have not been made aware of the full range of options available to me, despite the Consultation document claiming that parents are opting for mainstream. This is not my experience of parental choice.....I feel very strongly that the central claim of the Consultation document does not reflect the true experience of parents that are confused and frightened at a very emotional time for them."

Parent example 2: "Doesn't get enough s.a.l.t. (speech and language therapy) not sure if mainstream school is best for him, been told no room in special needs school."

Parent example 3: "Mainstream didn't believe that my child had a SLC (speech, language and communication) difficulty. It took 7 years of asking for them to listen."

This is very concerning and contradicts one of the LA's core assertions that the falling rolls are due to parental choice.

The apparent 'trend' in parental preference does not appear to have been fully discussed with the specialist provisions in the years prior to these proposals. This is also very concerning and may be construed as a deliberate policy to undermine the demand for specialist placements.

Feedback from speech and language schools in England does not uphold this apparently abrupt 'trend', for example Moorhouse, a specialist speech and language school, report being "inundated with requests from across England for placements at Key Stage 2."

ii) The outcomes of children with speech and language needs in mainstream are good.

The proposals state that 'outcomes for children with speech and language difficulties in mainstream are good'. This statement is too vague and further information is essential.

- What evidence underpins this broad statement?
- Does this refer to Foundation Phase *and* Key Stage 2?
- Do all the children referred to by this statement have severe and persisting speech and language needs?
- Does this statement include children with transitory speech and language delay?
- Have the children referred to by this statement received specialist provision?

- Why haven't the outcomes for the specialist provisions been included in this picture?

4. The proposals wrongly suggest that a specialist placement is incompatible with inclusion.

Parents tell us that they want their children to "thrive not just cope."

The Welsh Government guidance document, Inclusion and Pupil Support, points out that "mainstream education is not always right for every child or young person all of the time but if mainstream education is not right at a particular stage this should not prevent the child or young person from being included successfully at a later stage." (page 2, 1.1.1)

Parents tell us that timely access to specialist provisions like Meadowbank enable inclusion for children with severe needs who could not manage in mainstream.

Specialist provisions like Meadowbank do this through the carefully tailored and intensive specialist support and development of skills and strategies needed to participate fully. Children do transition successfully from Meadowbank to their local mainstream schools. Through this process and as part of the approach by the now closed Dayclass, mainstream schools can be supported to include children with speech and language needs.

Parent example 4: "He came straight into Reception and improved so much that by Y3 he was in mainstream. His speech is excellent now. I don't think potential parents are told about Meadowbank, but well-targeted early intervention meant my son thrived when he eventually entered mainstream. Put simply, Meadowbank taught him to speak and changed his life."

Parents need support and information to make fully informed choices. The Welsh Government guidance document, Inclusion and Pupil Support, highlights the importance of working supportively and in partnership with parents/carers and the children and young people themselves.

As part of a LA parent consultation in January 2012, parents highlighted that inclusion is part of school life in the specialist provisions.

If the LA promoted a culture of partnership working between special schools and mainstream schools, easy access to the expertise of special school staff would enable the pro-active consideration of a specialist provision in true partnership with parents at an early stage rather than waiting until a child has failed and/or viewed as compromising the efficient education of other children.

Parent example 5:

"The (mainstream) school decided that my son was a distraction that they could not handle... segregated to the point where he was not allowed to partake in assemblies, lunch or school trips...It eventually resulted in my son only being allowed into school for two hours in the mornings and being sent home with work for me to teach him. This continued for two years.... my son still could not speak..... My son was then referred to (name of a Specialist Resource Base) for six weeks which was a wholly disheartening and scary experience for both myself and my son as it was a completely inappropriate setting for his needs. Throughout this whole time I was attending over forty meetings with various members of the medical and teaching profession in regards to my son's situation and not once was Meadowbank offered as an option" I am happy to inform you that my son can now communicate with myself and others. He has learnt that he is not stupid or incapable and he has the confidence to sing on stage with his school mates and not feel ostracised. He can tackle reading and maths and is learning that he is deserving of friendship and understanding. He can enjoy school trips and is allowed to eat lunch with others. He is made to feel welcome and can feel proud to wear his school uniform. This is largely because of the amazing work of the staff in Meadowbank. The facilities and support they provide is something that I know cannot be replaced anywhere else."

- 5. The proposals are vague and do not offer parents an alternative but equivalent effective learning environment with an equivalent extent and intensity of specialist support.**

Meadowbank offers small class sizes, specialist teachers delivering the curriculum and a signing environment. Teachers, teaching assistants and speech and language therapists meet to plan their interventions together every week so that support is effectively joined up. The speech and language therapists are on-site to offer advice and support progress at a class and whole school level as well as direct therapy with the children. Parents report that the specialist staff know the children well and are able to take the time to listen and understand.

Strategies for supporting independence are embedded into everyday activities by a range of specialist staff across the whole school.

Current parents credit the specialist speech and language provision with enormous and transformative benefits including:

- Changing their child's life,
- Increasing the pace of progress, achievement and attainment,
- Improving children's self-belief and
- Helping the whole family to understand and communicate with their child.

Parents make a clear connection between appropriate specialist support and improved well-being and this is reflected in the research literature about severe speech and language needs.

Support in mainstream for severe speech and language needs in Cardiff does not offer the equivalent extent and intensity of support as a specialist placement, even at Stage 5 of the graduated response. Mainstream teachers do not have the same level of expertise. There are weekly visits from specialists in six week blocks and a child may be offered a programme with a one to one support worker.

The differences in type and extent of support for severe speech and language needs between mainstream and specialist provision needs to be clearly communicated to parents early on in the process of support.

If a child's needs cannot be met within a mainstream model, what alternatives is the LA offering as part of these proposals?

If a child has a profile with additional diagnoses that require a range of specialisms, the proposals suggest a placement at a special school that caters for children with global learning disabilities like Riverbank School, ASD like the Hollies School, a behaviour support SRB or in a nurture class.

However a child with a more specific profile of severe, persisting speech and language difficulties, who is unable to thrive in mainstream, will not have their needs addressed appropriately under these proposals. The specialist provisions mentioned above do not have the appropriate focus, specialist expertise and more intensive speech and language therapy.

Parent example 6: "(My child) was in a SRB (Specialist Resource Base) which did not meet his needs. The staff were inexperienced and were not trained to educate a child with my child's difficulties. He started to become behavioural.

His behaviour problems stopped when he started Meadowbank. Meadowbank has changed my son's life for the better. He could not express himself or answer simple questions before he went there."

The long term implications of poorly supported speech and language needs on educational attainments, mental health, employability and offending behaviours are evident in the research literature and in documents such as A Generation Adrift by The Communication Trust. To enable the best possible outcomes, it is important that the invisibility, impact and extent of this disability are properly understood and prioritised.

6. These proposals do not acknowledge the gaps in knowledge and skills and lack of capacity in mainstream to support severe speech and language needs.

Afasic Cymru remains concerned about the capacity in mainstream to meet the needs of children with severe speech and language needs.

Speech and language needs may impact on learning, literacy, overall achievement, play, social and emotional skills. As far as we are aware, all mainstream teachers across the Foundation Phase and Key Stage 2 are not routinely trained in specialised strategies for speech and language needs.

Head teachers have told us that their class teachers do not all feel equipped to teach children with severe speech and language needs. Mainstream speech and language programmes are usually delivered by teaching assistants, but this can be difficult in Key Stage 2 due to staffing pressures. For example, one school highlighted that there is only one teaching assistant to cover 110 children.

Comments from head teachers include:

- "Better (outcomes) in Foundation phase due to one to ones. Not enough TAs in key stage 2 to make much impact."
- "Higher burden on TAs in Key Stage 2, fewer TAs to share workload, less knowledge and understanding of development needs by teachers in Key Stage 2."
- "We feel that having a specialist provision is essential for speech and language and that our children will suffer without it. Early support is vital to preventing longer term learning delay."
- "We do not have the SEN resources to support these pupils as much as they need. We are delivering Speech Link sessions but do not feel fully equipped to do so as well as needed."

- “School staff are not able to provide a high level of speech and language therapy for children with significant difficulty in these areas.”

It is helpful for children with speech and language needs that can be met in mainstream, to be in a school that adopts a whole school approach to speech and language with training for all staff updated on a regular basis offering best practice universal strategies. Having one or two members of staff trained to level 2 or 3 through an Eklan course, is also a positive resource for a school but does not ensure specialist teaching for severe speech and language needs throughout the school.

Head teachers have told us that training and capacity building in mainstream has had mixed success. Comments include:

- “TAs (Teaching Assistants) do not have the expertise that exists in special schools.”
- “Training is useful as an additional support to specialist speech therapy but instead is increasingly being used to replace specialist support.”

Parents argue that prior to receiving a Statement of Educational Need for Meadowbank, support received in mainstream was inadequate and often over-reliant on teaching assistant support. Parents argue that their children need to be taught by teachers who are aware of and have the expertise necessary to teach children with these severe needs. They fear that the specialist approaches that their children need will be diluted and lost.

Parent example 7: “I struggled to understand the teaching was disengaged and could not follow instructions from the teacher. J had one to one support from the age of 2.5 due to his behaviour and little communication skills. Mainstream upset him so much he was taken kicking and screaming most mornings. Every child deserves an opportunity to succeed and be happy in life. It is so hard not to be heard or understood. Mainstream does not have the facilities or support network to assist those who need it. (a 1 to 1 worker was not enough to meet my sons needs and the sign language offered was sporadic at best). Meadowbank is much more than a school it offers support both emotionally and educationally to children and their families.”

Parent example 8: “My son struggled in mainstream as he had very poor language skills. He found it hard to communicate with other children. He had one excellent 1-2-1 assistant who undertook relevant training to help him

develop his language skills, the others weren't properly skilled to deal with his poor language skills. Had to fight for adequate 1-2-1 support but it wasn't going to help him long term with his education as he needed specialist intervention. He would not be the happy confident boy he is today had he stayed in mainstream and he wouldn't have the good friendships that he has in Meadowbank either as he really struggled with making friends before going here. Specialist intervention at an early age is so important so why remove such a provision?"

Parent example 9: "My two children attended Meadowbank. They had one to one support (in mainstream) but still struggled with speech as staff weren't experienced in this area. Meadowbank has been a great support for my children behaviour and emotional needs. They provide a good caring environment and they come on well with school work."

- 7. These proposals do not mention an increase in capacity in the number of specialist staff based in the achievement and inclusion team to support severe speech and language needs across the city.**

The reported specialist teacher staffing levels appear to be inadequate to enable an approach that consistently supports severe speech and language needs effectively as part of these proposals. What will be the size of caseload for each specialist teacher?

- 8. The proposals do not include a strategy to retain the skills of the specialist staff at Meadowbank and Allensbank so that they may continue to support children with severe speech and language needs.**

Staff have been issued with redundancy notices and this appears premature in light of a yet to be completed consultation process. The proposals show no regard for the importance of the specialism and no strategic planning to utilise staff knowledge and skills as far as possible for the benefit of children with severe speech and language needs. This does not inspire parents with confidence about the capacity of the LA to meet the needs of children with severe speech and language needs as part of these proposals.

- 9. The proposals do not include how speech and language therapy will be offered as part of these proposed changes.**

Parents are concerned about the intensity and specialism of speech and language therapy in a mainstream setting. Arrangements for

specialist, school-based speech and language therapy have not been clarified for children with severe and persisting speech and language needs. There is also no information about what the specialist speech and language therapy input would be to Early Intervention Classes.

The proposals promote the recent mainstream based speech and language therapy service, highlighting its advantages in terms of time and attendance at appointments. However, parents tell us that speech and language therapy in mainstream can be fragmented, not always specialist or collaborative and largely delegated. Even though the community service is based in mainstream schools, speech and language therapists, teachers and teaching assistants do not have the time and opportunity to meet together to plan and deliver carefully tailored activities on a weekly basis.

10. The proposals do not include a clear look at possible alternatives that may retain and develop the range of specialist provision for severe, persisting speech and language needs in Cardiff.

Retaining, growing and developing a specialist provision as a centre for excellence for the benefit of all children with severe and persisting speech and language needs in Cardiff does not appear to have been considered by these proposals. This is surprising as the Welsh Government identifies the value of utilising the expertise in special schools as centres of excellence.

Early and appropriate specialist intervention requires the pro-active consideration of a specialist provision in true partnership with parents at an early stage rather than waiting until a child has failed and/or is viewed in negative terms as compromising the efficient education of other children. Waiting until a child has failed is not inclusion. Feedback from parents in an LA speech and language consultation in 2012 and in connection with this consultation has highlighted how included their children feel when they are receiving the right specialist support in the right environment.

The development of specialist speech and language provisions could include re-introducing dual placements with a combination of full time and part time places, with short, medium or longer term admissions as appropriate according to a child's needs.

Afasic Cymru hopes that the Council will listen carefully to the parents, children and specialist staff who contribute to this consultation, and replace the proposal for closure with a strategic and comprehensive

plan to secure the current and long term future of specialist provisions for specific severe speech and language needs in Cardiff.

We do wish to be notified of publication of the consultation report.

References

Cost to the Nation

<http://www.afasiccymru.org.uk/new-bilingual-poster/>

Generation Adrift

<https://www.thecommunicationtrust.org.uk/resources/resources/resources-for-practitioners/a-generation-adrift.aspx>

SLI handbook:

<http://www.afasic.org.uk/recognising-a-problem/useful-reading/> click on sample pages

Welsh Government Inclusion and Pupil Support guidance document

<http://gov.wales/docs/dcells/publications/160318-inclusion-and-pupil-support-en.pdf>



ymatebionysgolion@caerdydd.gov.uk
School Organisation Planning Team
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CF10 4UW

11/03/2016

21st Century Schools, Consultation Document 2016: Consultation on Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties (Wales)

Thank you for this opportunity to provide our comments on the above document. The Welsh Language Commissioner's comments, and the issues which Cardiff County Council may wish to address as it develops the document further, may be summarised as follows:

The document provides guidance on how the proposed changes to schools organization introduced in relation to specialist provision for pupils with special educational needs (SEN) in Cardiff, will ensure a Welsh medium provision for pupils. In addition, there is reference to the growing need for efficient and specialist provision that includes the Welsh language.

It shows that the increase in demand for places in a Special School or a Specialist Resource Base for primary age pupils with challenging behaviour has increased by 30 percent over the past two years. The document states that the new arrangements will be of benefit to SEN pupils who need specialist Welsh medium support.

- **Considering how fundamental language is to any additional learning provision that may be required by learners, we suggest that the changes to school organization must ensure that any internal or external support provided by the relevant agencies is available in Welsh.**

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Comisiynydd y
Gymraeg
Welsh Language
Commissioner

- During the period of transition there is a possibility that the Specialist Resource Base will be operating mixed classes of pupils. During this period you should ensure that Welsh medium provision is available for pupils who need it and the language needs of learners are not therefore undermined.
- The document suggests that the proposed changes will be beneficial to the Welsh language with a Welsh medium intervention class provided in addition to the existing provision within the specialist resource bases. As part of this provision, a sufficient number of SEN staff who are able to provide support through the medium of Welsh should be ensured.
- You should ensure that you have an adequate supply of Welsh medium services in order to achieve the changes. In utilising external support from the Educational Psychology service and the Specialist Teachers Services who contribute to the assessments, providing support and advice, you should ensure that the information together with any support is available in Welsh for children and parents/carers.

Context

The principal aim of the Welsh Language Commissioner is to promote and facilitate the use of Welsh. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles underpin the Commissioner's work:

- In Wales, the Welsh language should be treated no less favourably than the English language;
- Persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

Secondary legislation has introduced new powers allowing the setting and imposing of standards on organizations. At the same time, the Commissioner will continue to inspect statutory language schemes through the powers inherited under the Welsh Language Act 1993.

The role of Welsh Language Commissioner was created by the Welsh Language (Wales) Measure 2011. The Commissioner may investigate failure to implement a language scheme; interference with the freedom to use Welsh in Wales and, in future, complaints regarding the failure of organizations to meet standards.



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

One of the Commissioner's strategic aims is to influence the consideration given to the Welsh language in terms of policy development. Comments are provided on policy in accordance with this remit and the Commissioner acts as an independent advocate on behalf of Welsh speakers in Wales who could be affected by this Bill. This approach is used to avoid any possible compromise of the Commissioner's functions in the area of regulation, and should the Commissioner wish to formally review the performance of individual bodies or the Welsh Government in accordance with the provisions of the Measure.

The United Nations Convention on the Rights of the Child and the Rights of Children and Young Persons (Wales) Measure 2011

The Rights of Children and Young Persons (Wales) Measure 2011 incorporates all the rights of the United Nations Convention on the Rights of the Child into Welsh domestic law. A number of the UNCRC articles refer specifically to language and freedom of expression.

Article 2 protects the child from suffering language discrimination and places a duty upon nations that are party to it to protect the child from all forms of discrimination. Articles 12 and 13 confer a right to freedom of expression for children and Article 30 gives a child who belongs to a minority the right to use his/her own language in a community with other members of his/her group.

Considering how fundamental language is to any additional learning provision that may be required by learners, we suggest that the changes to school organization must ensure that any internal or external support provided by the relevant agencies is available in Welsh.

During the period of transition there is a possibility that the Specialist Resource Base will be operating mixed classes of pupils. During this period you should ensure that Welsh medium provision is available for pupils who need it and the language needs of learners are not therefore undermined.

Welsh Government Policy Aims in terms of the Welsh Language

Strategic Aim 1 of the Welsh Government's Welsh-medium Education Strategy calls for an improvement in the planning of Welsh-medium provision in the pre-statutory and statutory phases of education, for learners with ALN. The Strategy notes that the aim of the Government in (SO1.5) is:

'To expect improved planning of Welsh-medium education provision and services for learners with additional learning needs (ALN) as an integral part of education provision at national, regional and local levels.'



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In the Government's strategy for promoting and facilitating the use of Welsh in everyday life, 'A living language: a language for living', the following aims are outlined:

'to increase the provision of Welsh-medium activities for children and young people and to increase their awareness of the value of the language; to increase and improve Welsh-language services to citizens'

A number of children and young people with additional learning needs may be vulnerable, and ensuring that vulnerable people can access services in the language in which they feel most comfortable is an intrinsic part of good service provision and effective workforce planning. The relevant organizations must acknowledge that some people can only express their needs effectively through the medium of Welsh, and services have a duty to meet those needs:

You should ensure that you have an adequate supply of Welsh medium services in order to achieve the changes. In utilising external support from the Educational Psychology service and the Specialist Teachers Services who contribute to the assessments, providing support and advice, you should ensure that the information together with any support is available in Welsh for children and parents/carers.

The importance of the document in Planning Welsh Medium Provision

The document explains the impact of the changes to school organization and in particular the benefits to pupils with additional learning needs who need Welsh medium support. However, the document is not sufficiently specific in some aspects. We refer in particular to underlining the importance of gathering evidence not only of the demand from learners for Welsh medium services but also in terms of the Welsh language skills of staff who will be providing the whole range of services under the banner of additional learning needs.

It is fair to say that not enough primary evidence has been gathered in terms of the number of pupils with specialist or additional learning needs and the adequacy of the support available in Welsh. Without this information, it is unclear how Welsh medium provision will be ensured for every child who needs it. There is reference to the need to use the Educational Psychology services and wider specialist support in the provision of additional support for pupils. Once again, there are no specific guidelines on how to provide for pupils who need this provision through the medium of Welsh:

The document suggests that the proposed changes will be beneficial to the Welsh language with a Welsh medium intervention class provided in addition to the existing provision within the specialist resource bases. As part of this provision, a sufficient number of SEN staff who are able to provide support through the medium of Welsh should be ensured.

Closing remarks

There is an attempt in this document to provide specifically for the Welsh language in planning the reorganization of schools introduced in relation to specialist provision for



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Commissioner**

pupils with special learning needs in Cardiff. The proposed changes acknowledge the importance of language to pupils and go as far as to say that the new arrangements will be beneficial to SEN pupils who need Welsh medium specialist support. However, you must also consider how these changes are to be achieved when looking in greater detail at the workforce planning in the context of the Welsh language.

Yours sincerely,

Meri Huws
Welsh Language Commissioner

MB16/241

Social Services Directorate collaborative response

Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

Yes. 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.

Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes. From previous lessons learned, it would be beneficial to consider the learning and support needs of the school as part of the change of delivery proposal. There may be a need for staff to consider the potential changes to their roles and delivery methods due to the change in needs of young people. Social services would support a holistic approach to working in partnership in meeting the needs of these young people. NB - the school is listed as a Red rated school. Does this change in function address the measures required to improve delivery? If not what additional measures are being put in place to improve the school and what impact will this have in the provision of support for young people with ASC?

Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture class to Early Intervention Classes?

Yes. This proposal supports the Social Services early intervention and prevention agenda, and it is pleasing to note the reference to Team Around the Family in the proposals for those young people where this may be required. It is essential that those young people who are identified early as needing additional support from an early intervention class are offered an early assessment of need, preferably using the JAFF assessment and TAF approach adopted through Cardiff's Early Help Strategy. Please liaise with Ceri George to explore further how this can be integrated from the outset to ensure a holistic approach to early help.

Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools)

Yes. In addition to the comments in Q8, how will proposals for those identified for Early Intervention classes, support families and young people in need to access support via the Information, Advice and Assistance services. Processes and relationships need to be considered and developed to ensure synergy between identification of need, and wider sources of support that can work in partnership with education services to provide an holistic early intervention approach to meeting the needs of vulnerable children and young people.

Phillips, Joanna

From: Chaundy, Paul (Cllr)
Sent: 20 March 2016 20:19
To: School Responses
Cc: Merry, Sarah (Cllr)
Subject: Consultation Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties

Dear All,

I understand the consultation for this closes 23 March 2016, I would dearly hope the following might be included please.

Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties

I would like to submit two following points in relation to these proposals:

1. Can you confirm that there will be sufficient places for pupils at 'special schools' with a particular learning profile for example those needing sign language, deaf-blind-born pupils, pupils with blindness and significant learning disabilities as well as difficulties with severe language impairment.
2. You state that demand for Specialist Resource Base (SRB) places are actually increasing in number, can the specialist and essential support for these pupils for the future be 'secure' given the financial constraints to and cuts to budgets for education currently taking place.

Thank you!

Yours sincerely,

Paul Chaundy (Cllr)

Phillips, Joanna

MB16/71

From: Martin, Alex
Sent: 06 April 2016 09:34
To: School Responses
Cc: Cowan, Jayne (Cllr)
Subject: Message from Cllr Cowan re: Meadowbank Special School

Dear sir/madam

I would like to put on record my huge concern about the prospect of Meadowbank Special School closing.

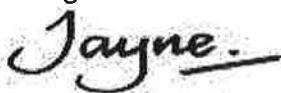
As a former teacher and current chairman of a special school, I know the importance of specialist provision.

I hope the Cabinet will reflect and allow this school to thrive and prosper. It is essential that the school is well promoted and all parents in Cardiff know that this facility is available.

Thousands of names have been submitted on a petition and many letters have been passed to the Council.

I hope this school is saved for the current pupils and future pupils needing this specialist provision.

Kind regards



Jayne L Cowan
CITY AND COUNTY OF CARDIFF COUNCILLOR FOR RHIWBINA

Phillips, Joanna

From: Boyle, Joe (Cllr)
Sent: 05 April 2016 18:22
To: School Responses
Cc: 110 - E-Mail All Liberal Democrats; Eluned Parrott lib/dem (elunedp@hotmail.co.uk)
Subject: Liberal Democrat response to SLD consultation
Attachments: SLD consultation Lib Dem group response.docx

Please find attached a document containing the formal response of the Liberal Democrat group to the consultation on specialist provision for primary aged pupils with speech and language difficulties and with behavioural emotional and social difficulties.

In relation to the four questions, our headlines responses are as follows; the attached document provides detailed explanation:

1. Do you support the proposal to address the fall in demand for speech and language special school places by closing Meadowbank Special School?

No

2. Do you agree with the proposal to respond to the fall in demand for places at Allensbank SRB by redeveloping this as a Specialist Resource Base for children with Autism Spectrum Conditions?

Yes

3. Do you agree with the proposal to convert Fairwater Specialist Resource Base, Glan yr Afon Revolving Door Class and Springwood Nurture Class to Early Intervention Classes?

No

4. Do you agree with the proposal to open four additional Early Intervention Classes (subject to further consultation with named schools).

No

Regards,

Joe Boyle
Councillor – Penylan
029 2046 2187.

Response to the proposals to close Meadowbank School

We contest the claim in the consultation that there is a 'falling demand for speech and language places.' All the evidence shows that the diagnosis of speech and language disorders among children is rising and that an increasing number of families are seeking solutions.

The figures that relate to demand for Meadowbank can be interpreted in a variety of ways and even manipulated to paint a narrative that fits the needs of the local authority rather than the needs of the children. The drop in numbers attending Meadowbank could be for a variety of reasons, not least a failure by the local authority to publicise the provision there adequately or specify it within statements of SEN.

As councillors, we have received powerful testimony from families who, in one breath, stress the importance of Meadowbank while, in the next, confirm that they were unaware of the provision until hearing about it through word of mouth. How many children who could benefit from the provision there are missing out because of a lack of awareness among families? There may well be a national trend towards more inclusive practice but that is different from concluding that inclusive education is the only model and that we should provide a one-size-fits-all solution. The drop in numbers is not, in and of itself, proof that such provision is unnecessary.

As we know, the Vale historically funded ten places. Therefore, in 2010-11, when the school had a full complement, 30 places would have been filled from within Cardiff. That has dropped to 23, which indicates that there remains a demonstrable need from within Cardiff. There is no firm proof that this number would not rise were the school's role better publicised and its rating (currently amber) improved. Indeed, once combined with the children in Allénbank, the school nears its full capacity.

Afasic, the charity for adults and children with specific language disorders, lists special Speech & Language schools across the UK. Their belief in the effectiveness of such provision (albeit through private institutions) provides expert endorsement of a special school model in the appropriate circumstances.

Current research regarding the benefit of special schools is also far less conclusive than the consultation might lead one to believe. The following findings from a recent paper to emerge from Cambridge University argues that special schools remain a valid part of the education mix:

'... inclusion policy should not be one-size-fits-all or subject to heavy political correctness or financial influence, but rather be individual-oriented and needs-led. The findings suggest that especially for children with severe learning difficulties (SLD), special school provision still plays an important role in the current education system considering its pedagogy expertise, professional staff team, specialised resources, and curriculum flexibility. This paper therefore concludes that specialised educators from independent special schools for SLD children may tend to see special school provision as positively contributing to inclusive education, and should hence be regarded as an inseparable part of the current education system.'

- *Understanding Special School Provision for Children with Severe Learning Difficulties in Relation to Inclusive Education, Xiao Qu (2015)*

In fact, the consultation describes just how effective such specialist provision is when it states that '[T]he majority of pupils attending Meadowbank Special School and Allensbank SRB transfer to a local high school at Year 7 and many pupils make sufficient progress to transfer at an earlier stage.' This admission of success is justification for retaining this type of provision rather than closing it.

As the Additional Learning Needs Strategy sets out, 'all children should have access to an appropriate education.' The success Meadowbank has with its pupils shows that this is the appropriate setting for them. There is insufficient evidence to prove that an alternative provision, such as an Early Intervention Class, would be appropriate. Maintaining a broad palette of provision is therefore the surest way of ensuring that all children access appropriate education.

The counter argument made in the consultation, that the school-based therapy service is sufficient, is not adequately evidenced and the historical data is inevitably lacking. Equally lacking is evidence relating to the success of early intervention and capacity building within Cardiff's mainstream schools. As with much of this consultation document, this is an assertion and not a proof. In making decisions of this seriousness, we would have expected greater rigour and it is disappointing that the effort to make the case is not supported with better evidence. The only evidence provided (5e and Table 4) refers to an improvement of 20 percentage points during the Reception year. What is this data based on? How many children are being referred to? Are those children diagnosed as having a specific language disorder? Children without a language disorder who come to school from a language impoverished household or with English as a second language may well make good progress through 'Speech Links' and 'Language Links' programmes. But evidence of these programmes' effectiveness with children who have more complex or neurological challenges must be provided if a satisfactory conclusion can be drawn. Table 4 (page 8) does not provide enough detail to make such judgements.

Once again, the consultation fails to provide this rigorous analysis and there is a justifiable anxiety that assertion and partial evidence is being used in place of evidence.

Response to proposals in relation to Allensbank School

Were the specialist provision to be maintained at Meadowbank, we are broadly supportive of the plans to convert Allensbank to an autism specialist resource base. It is clear from existing bases that the specialist support provided in them is well-suited to children with more high-functioning autism or Asperger's Syndrome.

Response to proposals in relation to Early Intervention Classes

Based on the consultation report, we are unconvinced that the plans are robust enough to progress and we cannot support their implementation at this stage.

We have concerns about the following:

Purpose of an EIC (paragraph 8a)

The first bullet point of paragraph 8a covers a broad spectrum of conditions and children, some of whom may merit formal diagnosis but have not yet received one. It seems the height of folly for a child with a pervasive developmental disorder, not otherwise specified, to be thrown into close proximity with a child displaying severe emotional difficulties. The range of interventions and settings needed to deal with the two are likely to be different. There are no guarantees within the consultation to reassure us that the EICs will be able to provide an appropriate level of support and education.

The move towards specialist resource bases for autism and other conditions such as dyslexia is an acknowledgement that many conditions require specialist help and that a one-size-fits-all solution is not appropriate for children with these diagnoses. Such specialist provision is also surely necessary for other children presenting with complex conditions and behaviours, even if they do not currently have a formal diagnosis.

As the proposals for Allensbank state, 'care would be taken not to compromise the quality of support by placing pupils with **incompatible needs together**.' However, is this not precisely the risk that is being taken with the EICs?

The suggested benefits are illogical. The proposals, it is claimed, will 'reduce the number of transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream education throughout their education.' However, by not having the option of Meadowbank, precisely what specialist support will they receive? Will local schools be expected to develop specialisms in dyspraxia, aphasia, selective mutism, semantic and pragmatic disorders, receptive language problems, PDD (NOS) and so on?

Will children who would merit a place at Meadowbank in fact now find themselves attending an EIC for three to four terms, before returning to their local school? This surely amounts to a 'transfer'. What then, if said child finds that the reintegration at their local school does not provide the necessary level of support? Will they be expected to transfer once more to an EIC for another three to four terms?

There appears to be an assumption that a speech and language disorder is something temporary or akin to a behavioural difficulty that can be ironed out over twelve months. This flies in the face of any credible research. SLDs are often pervasive developmental disorders that do not simply vanish.

Processes (paragraph 8b)

We believe the schools with the EICs, should these plans be pushed through, ought to have a say about which children they accept. We do not believe these decisions should be left to a panel of headteachers and professionals without the input of the headteacher of the EIC school or its governors. The consent of the hosting school must be received before children are admitted.

Operation (paragraph 8d)

For such a critical issue, we are surprised that the consultation does not go into more detail about how the EICs would work.

- What happens if, after four terms, integration to the local school is not deemed appropriate or the local school is unwilling to receive the child back?

- Who will manage the phased reintegration, the IDPs, the multi-disciplinary assessments, the liaison with psychology and specialist teacher services? The hosting school, the local school or the local authority?
- Where are the case studies to show how local schools would develop capacity to enable successful reintegration? What capacity would they be expected to develop? How would it be funded? What level of support would be required to ensure that the reintegrated child did not slip back?

Without detail about these issues, it is impossible to judge whether the plans offer a cogent and well-conceived strategy.

Quality and Standards

We question the decision to place EICs in Fairwater and Glan yr Afon considering their red status, a problem shared by Allensbank. At a time when these schools are clearly struggling with their mainstream operations, it is debatable whether it is wise to provide them with further burdens and leadership requirements.

In particular, we are mystified by the claim that, 'as the proposals are not proposing any changes in respect of mainstream education provision it is not anticipated that there will be any impact on the quality of standards.' The implication of this is that the EICs will be entirely detached from the operation of the mainstream school. It is hard to see how this can be true. If the children who attend an EIC are to feel a genuine part of their hosting school community, then housing such a class is a serious commitment for that school. It must, by necessity, affect leadership, the existing school staff and pupils and the wider school community. Were it not to, one would have to question why the EIC was being placed in a mainstream school in the first place. It might just as well be put in County Hall.

If the local authority did not anticipate any potential impact on standards, the consultation would not need to assert that 'careful planning will take place during the proposed period of change to avoid any risk of distraction or disruption.' In other words, there is a risk of distraction and disruption. However, there is no clarity at all about what the 'careful planning' referred to will entail, what additional funding or resources will be provided, what alterations to school buildings will be required. This lack of clarity is alarming.

Equally alarming is the fact that merely two potential disadvantages of the proposals are listed. Our response and the response from other consultees have demonstrated that the potential disadvantages are legion. It is hard to believe that this consultation has worked its way through officers, senior directors and a cabinet member with only these two mild disadvantages identified. Once again, the lack of rigour is alarming. For the Equality Impact Assessment then to blithely claim that the proposals would not adversely affect a particular group without any reference to the disability protected characteristic seems extraordinary. As a result, the proposals lack credibility.

Response to the proposals to close Meadowbank School

We contest the claim in the consultation that there is a 'falling demand for speech and language places.' All the evidence shows that the diagnosis of speech and language disorders among children is rising and that an increasing number of families are seeking solutions.

The figures that relate to demand for Meadowbank can be interpreted in a variety of ways and even manipulated to paint a narrative that fits the needs of the local authority rather than the needs of the children. The drop in numbers attending Meadowbank could be for a variety of reasons, not least a failure by the local authority to publicise the provision there adequately or specify it within statements of SEN.

As councillors, we have received powerful testimony from families who, in one breath, stress the importance of Meadowbank while, in the next, confirm that they were unaware of the provision until hearing about it through word of mouth. How many children who could benefit from the provision there are missing out because of a lack of awareness among families? There may well be a national trend towards more inclusive practice but that is different from concluding that inclusive education is the only model and that we should provide a one-size-fits-all solution. The drop in numbers is not, in and of itself, proof that such provision is unnecessary.

As we know, the Vale historically funded ten places. Therefore, in 2010-11, when the school had a full complement, 30 places would have been filled from within Cardiff. That has dropped to 23, which indicates that there remains a demonstrable need from within Cardiff. There is no firm proof that this number would not rise were the school's role better publicised and its rating (currently amber) improved. Indeed, once combined with the children in Allensbank, the school nears its full capacity.

Afasic, the charity for adults and children with specific language disorders, lists special Speech & Language schools across the UK. Their belief in the effectiveness of such provision (albeit through private institutions) provides expert endorsement of a special school model in the appropriate circumstances.

Current research regarding the benefit of special schools is also far less conclusive than the consultation might lead one to believe. The following findings from a recent paper to emerge from Cambridge University argues that special schools remain a valid part of the education mix:

'... inclusion policy should not be one-size-fits-all or subject to heavy political correctness or financial influence, but rather be individual-oriented and needs-led. The findings suggest that especially for children with severe learning difficulties (SLD), special school provision still plays an important role in the current education system considering its pedagogy expertise, professional staff team, specialised resources, and curriculum flexibility. This paper therefore concludes that specialised educators from independent special schools for SLD children may tend to see special school provision as positively contributing to inclusive education, and should hence be regarded as an inseparable part of the current education system.'

- *Understanding Special School Provision for Children with Severe Learning Difficulties in Relation to Inclusive Education, Xiao Qu (2015)*

In fact, the consultation describes just how effective such specialist provision is when it states that '[T]he majority of pupils attending Meadowbank Special School and Allensbank SRB transfer to a local high school at Year 7 and many pupils make sufficient progress to transfer at an earlier stage.' This admission of success is justification for retaining this type of provision rather than closing it.

As the Additional Learning Needs Strategy sets out, 'all children should have access to an appropriate education.' The success Meadowbank has with its pupils shows that this is the appropriate setting for them. There is insufficient evidence to prove that an alternative provision, such as an Early Intervention Class, would be appropriate. Maintaining a broad palette of provision is therefore the surest way of ensuring that all children access appropriate education.

The counter argument made in the consultation, that the school-based therapy service is sufficient, is not adequately evidenced and the historical data is inevitably lacking. Equally lacking is evidence relating to the success of early intervention and capacity building within Cardiff's mainstream schools. As with much of this consultation document, this is an assertion and not a proof. In making decisions of this seriousness, we would have expected greater rigour and it is disappointing that the effort to make the case is not supported with better evidence. The only evidence provided (5e and Table 4) refers to an improvement of 20 percentage points during the Reception year. What is this data based on? How many children are being referred to? Are those children diagnosed as having a specific language disorder? Children without a language disorder who come to school from a language impoverished household or with English as a second language may well make good progress through 'Speech Links' and 'Language Links' programmes. But evidence of these programmes' effectiveness with children who have more complex or neurological challenges must be provided if a satisfactory conclusion can be drawn. Table 4 (page 8) does not provide enough detail to make such judgements.

Once again, the consultation fails to provide this rigorous analysis and there is a justifiable anxiety that assertion and partial evidence is being used in place of evidence.

Response to proposals in relation to Allensbank School

Were the specialist provision to be maintained at Meadowbank, we are broadly supportive of the plans to convert Allensbank to an autism specialist resource base. It is clear from existing bases that the specialist support provided in them is well-suited to children with more high-functioning autism or Asperger's Syndrome.

Response to proposals in relation to Early Intervention Classes

Based on the consultation report, we are unconvinced that the plans are robust enough to progress and we cannot support their implementation at this stage.

We have concerns about the following:

Purpose of an EIC (paragraph 8a)

The first bullet point of paragraph 8a covers a broad spectrum of conditions and children, some of whom may merit formal diagnosis but have not yet received one. It seems the height of folly for a child with a pervasive developmental disorder, not otherwise specified, to be thrown into close proximity with a child displaying severe emotional difficulties. The range of interventions and settings needed to deal with the two are likely to be different. There are no guarantees within the consultation to reassure us that the EICs will be able to provide an appropriate level of support and education.

The move towards specialist resource bases for autism and other conditions such as dyslexia is an acknowledgement that many conditions require specialist help and that a one-size-fits-all solution is not appropriate for children with these diagnoses. Such specialist provision is also surely necessary for other children presenting with complex conditions and behaviours, even if they do not currently have a formal diagnosis.

As the proposals for Allensbank state, 'care would be taken not to compromise the quality of support by placing pupils with **incompatible needs together**.' However, is this not precisely the risk that is being taken with the EICs?

The suggested benefits are illogical. The proposals, it is claimed, will 'reduce the number of transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream education throughout their education.' However, by not having the option of Meadowbank, precisely what specialist support will they receive? Will local schools be expected to develop specialisms in dyspraxia, aphasia, selective mutism, semantic and pragmatic disorders, receptive language problems, PDD (NOS) and so on?

Will children who would merit a place at Meadowbank in fact now find themselves attending an EIC for three to four terms, before returning to their local school? This surely amounts to a 'transfer'. What then, if said child finds that the reintegration at their local school does not provide the necessary level of support? Will they be expected to transfer once more to an EIC for another three to four terms?

There appears to be an assumption that a speech and language disorder is something temporary or akin to a behavioural difficulty that can be ironed out over twelve months. This flies in the face of any credible research. SLDs are often pervasive developmental disorders that do not simply vanish.

Processes (paragraph 8b)

We believe the schools with the EICs, should these plans be pushed through, ought to have a say about which children they accept. We do not believe these decisions should be left to a panel of headteachers and professionals without the input of the headteacher of the EIC school or its governors. The consent of the hosting school must be received before children are admitted.

Operation (paragraph 8d)

For such a critical issue, we are surprised that the consultation does not go into more detail about how the EICs would work.

- What happens if, after four terms, integration to the local school is not deemed appropriate or the local school is unwilling to receive the child back?

- Who will manage the phased reintegration, the IDPs, the multi-disciplinary assessments, the liaison with psychology and specialist teacher services? The hosting school, the local school or the local authority?
- Where are the case studies to show how local schools would develop capacity to enable successful reintegration? What capacity would they be expected to develop? How would it be funded? What level of support would be required to ensure that the reintegrated child did not slip back?

Without detail about these issues, it is impossible to judge whether the plans offer a cogent and well-conceived strategy.

Quality and Standards

We question the decision to place EICs in Fairwater and Glan yr Afon considering their red status, a problem shared by Allensbank. At a time when these schools are clearly struggling with their mainstream operations, it is debatable whether it is wise to provide them with further burdens and leadership requirements.

In particular, we are mystified by the claim that, 'as the proposals are not proposing any changes in respect of mainstream education provision it is not anticipated that there will be any impact on the quality of standards.' The implication of this is that the EICs will be entirely detached from the operation of the mainstream school. It is hard to see how this can be true. If the children who attend an EIC are to feel a genuine part of their hosting school community, then housing such a class is a serious commitment for that school. It must, by necessity, affect leadership, the existing school staff and pupils and the wider school community. Were it not to, one would have to question why the EIC was being placed in a mainstream school in the first place. It might just as well be put in County Hall.

If the local authority did not anticipate any potential impact on standards, the consultation would not need to assert that 'careful planning will take place during the proposed period of change to avoid any risk of distraction or disruption.' In other words, there is a risk of distraction and disruption. However, there is no clarity at all about what the 'careful planning' referred to will entail, what additional funding or resources will be provided, what alterations to school buildings will be required. This lack of clarity is alarming.

Equally alarming is the fact that merely two potential disadvantages of the proposals are listed. Our response and the response from other consultees have demonstrated that the potential disadvantages are legion. It is hard to believe that this consultation has worked its way through officers, senior directors and a cabinet member with only these two mild disadvantages identified. Once again, the lack of rigour is alarming. For the Equality Impact Assessment then to blithely claim that the proposals would not adversely affect a particular group without any reference to the disability protected characteristic seems extraordinary. As a result, the proposals lack credibility.

Eluned Parrott

Aelod Cynulliad dros
Ganolf De Cymru

Assembly Member for
South Wales Central



Cynulliad National
Cenedlaethol Assembly for
Cymru Wales

School Organisation Planning Team
Room 219
Cardiff Council
County Hall
Atlantic Wharf
Cardiff CF10 4UW

schoolresponses@cardiff.gov.uk

Ref: 137030/CW/Education

Date: 14th March 2016

MEADOWBANK SCHOOL

I am writing to express my concern at the proposed closure of Meadowbank School.

I understand officers have recommended its closure because there has been a significant decline in pupil numbers but I am also advised that not all parents are made aware of its existence and, if they had been, they would have elected for their children to receive the specialist services it provides.

I am, therefore, concerned that parents are not choosing to send their children to mainstream education but, rather, they are not being given the choice of an alternative.

10 years ago, the architect of the integration of special needs children into the mainstream education system published a damning report on how this ideal was failing to achieve its ambitions and how children can feel excluded if they are placed into a mainstream school. Apart from feeling socially isolated, such children can also easily fall victim to bullying.

Whilst Eluned Parrott AM will treat as confidential any personal information which you pass on, she will normally allow staff and authorised volunteers to see if this is needed to help and advise you. The AM may pass on all or some of this information to agencies, such as the DWP, the Inland Revenue or the local Council if this is necessary to help with your case.

Eluned Parrott AM may wish to write to you from time to time to keep you informed on issues which you may find of interest. Please let her know if you do not wish to be contacted for this purpose.

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Assembly Member for
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I recognise it is important that the Council continually reviews Cardiff's education provision to match school places to school demand but I am concerned that the stated demand for "inclusion" may be driven by financial considerations rather than pupils' needs.

I am also concerned that the need to match school places to school demand is already failing to meet the needs of mainstream children transferring from primary to secondary education and the proposal for a supported programme of reintegration of Meadowbank's current and future pupils to local mainstream school will be to the disadvantage of everyone concerned.

I believe that, as the only specialist speech and language school in Wales, which also receives funding from participating local authorities, should be maintained and that it would be counter-productive, both emotionally and financially, to force children to transfer to mainstream schools before they are able to learn the necessary communication skills to successfully integrate with their peers.

Yours sincerely,

ELUNED PARROTT AM

Welsh Liberal Democrat Assembly Member for South Wales Central

Whilst Eluned Parrott AM will treat as confidential any personal information which you pass on, she will normally allow staff and authorised volunteers to see if this is needed to help and advise you. The AM may pass on all or some of this information to agencies, such as the DWP, the Inland Revenue or the local Council if this is necessary to help with your case.

Eluned Parrott AM may wish to write to you from time to time to keep you informed on issues which you may find of interest.

Please let her know if you do not wish to be contacted for this purpose.

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Phillips, Joanna

From: Morgan, Julie (Assembly Member) <Julie.Morgan@assembly.wales>
Sent: 05 April 2016 14:10
To: School Responses
Subject: Meadowbank

Dear Sir/Madam,

I am writing in response to the proposal to change the arrangements for provision for children with speech and language difficulties and in particular, the proposal to close Meadowbank School in August 2017. I understand it is the only special school of its kind in Wales, which provides day education for primary aged pupils who have statements of special educational needs for their severe and specific speech, language and communication needs. I am aware that many parents of children attending the school are fighting to save the school from closure as they feel that mainstream education is not a suitable alternative for their children and I can understand why they are concerned.

I am aware that pupils will be offered a transfer to the specialist resource base at Allensbank Primary School or a supported programme of reintegration into their local mainstream school. However, Meadowbank is a centre of excellence, with very small classes, and specialist staff and this has been extremely helpful to the pupils, many of whom have improved their speech and language abilities and as a result they have been able to make friends and become more sociable, whilst this was not possible when they attended mainstream schools. Parents have told me how their children's lives have been transformed after a period in Meadowbank.

I am concerned at the loss of expertise which the closure of Meadowbank would entail. At a public meeting for parents recently, when this was raised, they were told that the teachers could be retrained or possibly redeployed but this seems an appalling waste of expertise, which will surely still be needed under the new system. I understand that speech and language problems are growing. Surely we must keep the expertise of Meadowbank staff in these circumstances.

The reason given for the recommendation by officers to close Meadowbank in August 2017 is what is described as "a significant decline in pupil numbers". However, I have heard that many parents describe the school as "Cardiff's best kept secret", as they feel it is not sufficiently publicised. Many paid for private sessions for their children with a speech and language therapist and only then learned from the private tutor about Meadowbank, while they had never before been told of the existence of the specialist school. They therefore feel that it is possible that there are still many other children who could benefit from such a facility, if they knew about it.

I have concerns that schools not specialising in speech and language therapy will not be able to meet the needs of the children. Please can the local authority rethink its proposals and find some way of enabling this school to continue its excellent work.



Julie Morgan AC/AM
Aelod Cynulliad Gogledd Caerdydd
Assembly Member for Cardiff North

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**Cynulliad
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Croesewir gohebiaeth yn Gymraeg neu Saesneg
We welcome correspondence in Welsh or English

Ystyriwch amgylchedd - oes rhaid i chi brintio'r ebost hwn?
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"Dylai unrhyw ddatganiadau neu sylwadau uchod gael eu trin fel rhai personol ac nid o reidrwydd fel datganiadau neu sylwadau gan y Cynulliad Cenedlaethol Cymru, unrhywn ran ohoni neu unrhywn gorff sy'n gysylltiedig a hi."

"Any of the statements or comments made above should be regarded as personal and not necessarily those of the National Assembly for Wales, any constituent part or connected body."

Phillips, Joanna

From: WILLIAMS, Craig <craig.williams.mp@parliament.uk>
Sent: 07 March 2016 11:57
To: School Responses
Subject: Specialist provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.

My Ref: CW/AR/Meadowbank

Dear Sir/Madam,

Re 21st Century Schools: Specialist provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.

I have been contacted by several constituents in relation to the above consultation. They have highlighted to me that the consultation proposes the closure of Meadowbank school and have asked me to support their opposition to its closure, which I am happy to do.

I am concerned that much of the justification for the closure of Meadowbank school appears to be falling rolls. A number of those who contacted me emphasised how the provision at Meadowbank offered what could not be offered in mainstream school (including those with SRB provision) and highlighted how their children have developed successfully due to attendance at Meadowbank.

All who contacted me made the point that in their view Meadowbank was not promoted by the LEA as an alternative to mainstream options and that in some cases it was just by chance that they were made aware of it. They feel that this has exacerbated the issue with falling rolls.

In view of the comments I have received I would be grateful if you could reconsider the proposal to close Meadowbank school.

With kind regards,

Craig

Craig Williams MP

Member of Parliament for Cardiff North

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Phillips, Joanna

From: WILLIAMS, Craig <craig.williams.mp@parliament.uk>
Sent: 29 March 2016 12:47
To: School Responses
Subject: Specialist provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.
Attachments: Specialist provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.

Our Ref: CW/AR/Meadowbank

Dear Sir/Madam,

Further to my previous email (attached for convenience), one of my members of staff attended the public meeting held on 16th March and highlighted to me that there were a number of points raised by those present. Whilst I am sure that you have captured the comments made at the meeting, I felt it important to re-iterate the following points:

- 1) Many offered examples of success stories for their children and it is important that these are not overlooked in the final decision
- 2) A number felt that they had been offered schools which were not suitable in the first instance and that the option of Meadowbank had not been given.
- 3) Those present also felt that Meadowbank was not publicised by the Council, especially in relation to statemented children.
- 4) There was concern about the staff and whether their jobs would be protected. If the school closes then there is a high risk that a lot of experienced, specialist staff will be lost.
- 5) Comments were made about the parent/teacher pupil ratio in mainstream for those who are statemented/with SEN compared with that at Meadowbank.

As previously, I'd be grateful if you could take the comments into consideration and reconsider the proposal to close Meadowbank school.

With kind regards,

Craig

Craig Williams MP

Member of Parliament for Cardiff North

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