

**CABINET MEETING: 14 JULY 2016**

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

**REPORT OF DIRECTOR OF EDUCATION AND LIFELONG LEARNING**

**AGENDA ITEM: 6**

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**PORTFOLIO: EDUCATION (COUNCILLOR SARAH MERRY)**

**Reason for this Report**

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

**Background**

2. At its meeting on 03 December 2015 the Cabinet authorised officers to undertake a public consultation on proposals to:
  - Close Meadowbank Special School at the end of the academic year 2017.
  - Continue to maintain a Specialist Resource Base (SRB) at Allensbank School but cease admission of pupils with speech and language difficulties, unless transferring from Meadowbank Special School. Redesignate this as an SRB for pupils with autism spectrum conditions (ASC), with first admission of ASC children in September 2018.
  - Continue to maintain a Specialist Resource Base at Fairwater School but cease admission of pupils with statements for behaviour emotional and social difficulties. Redesignate this as an Early Intervention Class (EIC) from September 2018.
  - Maintain the specialist classes at Glan Yr Afon (Revolving Door) and Springwood (Nurture Class), but rebadge these as Early

Intervention Classes, adopting the proposed admission criteria and operational procedures outlined above from September 2018.

- Identify four additional primary schools (one in Welsh-medium sector, three school in the English-medium sector) in various locations across the city to host Early Intervention Classes.

## **Issues**

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

## **Responses received during the consultation period**

6. In total 253 responses were received including 52 online responses and 201 paper/ e-mail responses).
7. Responses were received from Estyn, Governing Bodies of schools, Headteachers, other stakeholders including The Cardiff and the Vale Speech and Language Therapists, the Royal College of Speech and Language Therapists, Afasic, the Welsh Language Commissioner

and the Social Services Directorate and from school staff, parents, pupils and members of the public

8. Formal responses are included in Appendix 2.
9. The views expressed at Council organised meetings and on paper or electronically through the appropriate channels, have been recorded.
10. The majority view expressed during the consultation at meetings and in written correspondence was one of opposition to the proposed closure of Meadowbank Special School and re-designation of Allensbank SRB for speech and language as an SRB for autism spectrum conditions.
11. A minority of the responses also expressed a view about the proposal to open a network of Early Intervention Classes. Those who did so expressed concern about a lack of clarity regarding the purpose and criteria for these classes.
12. A summary of the main views expressed and the Council's response are set out below.
13. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.

### **Estyn Response**

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

### **Appraisal of views expressed by ESTYN**

15. The Council acknowledges the views expressed.

### **Governing Bodies' Responses**

16. Responses were received from the Governing Bodies of Meadowbank, Allensbank, Fairwater, Glan Yr Afon, and Springwood primary schools. The full responses are included in Appendix 2.

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

- *Concerns expressed regarding pupils with speech and language difficulties and behavioural and emotional social needs in the same class.*
- *Concerns expressed regarding pupils in Early Intervention Classes returning to mainstream classes within 3-4 school terms.*
- *The Fairwater Primary School Governing Body wish for nursery provision to be established at the school, and for the existing SRB to close.*

21. The Glan yr Afon Primary School Governing Body expressed their views at a consultation meeting held at the school, and through a written response from one governor:

- *The Governing Body would consider hosting an EIC if they were able to negotiate on the age and severity of the pupils admitted to the class.*
- *Admitting Year 5 and 6 pupils with severe needs to the Revolving Door class has a detrimental impact on the school but functions well when places are occupied by year 3 and 4 children.*

22. The response from the Governing Body of Springwood Primary School included the following points:

- *Consideration must be given to ensuring there is sufficient accommodation in the school should the LA decide to base other services onsite. Operating with a much reduced space may impact on the ability to accommodate an EIC.*
- *A wish for clarity around the nature of the children who would attend the EIC.*
- *Concern around a panel of Headteachers and staff placing children without input from a school's senior leadership or governors.*
- *Concern that the mix of children with autism attending the school's SRB for autism) and pupils with complex emotional social and behavioural needs would be difficult to manage in one school.*

### **Appraisal of views expressed by Governing Bodies**

23. The Council notes the views expressed by the Governing Bodies that responded to the consultation.

24. The Council has worked in partnership with Meadowbank on a number of projects to develop speech and language provision including a review of secondary support for pupils with severe specific language impairments and the review and further development of an outreach service to support pupils in nursery settings.

25. The key criteria for the Early Intervention Classes would be 'children at risk of exclusion' i.e. those who are experiencing behavioural difficulties. However, the child's needs would be addressed holistically, including any speech and language needs, and any

specific difficulties with literacy and numeracy that may co-exist with the child's emotional and social needs.

26. The demand for special school and SRB places for children with specific language impairments has been falling in Cardiff and other local authorities for many years. The decline in numbers since 2010 is set out in the table below, but the fall in demand was already an ongoing trend. Prior to 2006, Allensbank SRB offered 30 places. A class was closed in 2006, in response to falling numbers, and the Allensbank class size reduced from 20 to 16 in 2011. The reasons for this trend are set out in the consultation document on pages 5-7.

*Meadowbank and Allensbank SRB numbers on roll, 2010-2015*

	Meadowbank	Allensbank	Total Pupils
2010-11	40	18	58
2011-12	35	18	53
2012-13	34	13	47
2013-14	32	16	48
2014-15	27	14	41
Nov-15	23	11	34

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

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

37. The Council acknowledges the Governing Body's concern that the existing SRB for children with autism spectrum conditions should not be compromised by accommodating a specialist provision for children with BESN at the school. Alternative locations for the EIC would therefore be considered.

### **Primary School Headteachers' Responses**

38. Primary school Headteachers provided a collective response setting out their opposition to the proposed closure of Meadowbank Special School and to the re-designation of Allensbank SRB. Separate responses were also received from the Headteachers of Meadowbank, Moorland and Springwood primary schools.

39. The full responses are included in Appendix 2.

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

41. The collective primary school Headteachers' response included the following points:

- *Meeting the needs of the most complex children has improved but remains a challenge.*
- *The fall in demand for places at Meadowbank and Allensbank correlates with fewer statements for children with speech language and communication needs being issued in recent years.*
- *The skills of highly trained staff in specialist environments is often the most effective way of securing the best outcomes for these learners with speech language and communication skills and challenging behaviour.*
- *Greater emphasis should be placed on speech, language and communication assessments for children whose overt needs appear behavioural. Early support for SLCN is essential to reduce the risk of young people becoming NEET (Not in Education Employment or Training).*
- *The high proportion of Meadowbank and Allensbank pupils who successfully reintegrate to mainstream is evidence of the high quality teaching they received and the long lasting impact of the placements. This level of reintegration is not the case for any other specialist provision within the city.*

42. The response of the Headteacher of Meadowbank School raised the following points:

- *Opposition to the closure of Meadowbank School,*
- *Support for the redesignation of Allensbank SRB*
- *Support for the development of EICs:*
- *Children with severe and profound speech and language impairments (SLI) require a small class setting with experienced teaching staff that understand speech and language difficulties, specialist resources and specialised teaching approaches and*



*strategies. Meadowbank is a centre of excellence that provides all of the above.*

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

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

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

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

- *Meadowbank School should not close but the Council should explore whether BESN/ SLCN provision could be developed at the school.*
- *Support for the proposed development of EICs.*

- *Concern expressed that the needs of the pupils in the EICs will be too broad.*
- *Concern at the sufficiency of EIC places.*
- *There is a need to ensure an equitable system for placement across the city, recognising that the demand/threshold in some areas will be much higher than in others.*

### **Appraisal of views expressed by Headteachers**

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

language for all Reception aged children, extensive training, and specialist support from specialist teachers. This has significantly improved parental confidence in mainstream support.

- Approximately 88% of children with the most severe speech and language needs attend their local mainstream school and evidence shows that they make good progress with the specialist support they receive (see paragraph 46).

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

Classes. If the proposal were progressed, the Council would work with all schools to agree on a fair approach to placements.

57. Based on current levels of referral, it has been calculated that 56 EIC places would be sufficient to respond to current need.
58. The Council acknowledges the points made regarding the high incidence of SLCN in children and young people with behavioural emotional and social needs. A range of steps have been taken in Cardiff to address this including:
- Universal screening for speech and language needs in Reception.
  - A collaborative approach between the specialist teacher service and the UHB speech and language therapy service to ensure every child with a diagnosed need receives appropriate support.
  - Joint working between the specialist teacher services for speech and language and for behaviour support. A speech and language therapist employed by Education to work in both teams.
  - Where schools refer children for behaviour support, the Partnership Area Referral Meeting (PARM) routinely requires information about the child's speech and language scores, literacy and numeracy levels and considers support needs holistically.
  - Two terms of intensive support at The Court Special school to embed Speech and Language Links and to develop a range of speech and language interventions in the practice of the school.
  - Arranging for the Youth Offending Service to be included in speech and language training provided by AFASIC.
  - There are plans to work with Bryn y Deryn and Greenhill to embed speech and language screening and to undertake further collaborative work with the Youth Offending Service.
59. The Council will consider any further steps that may be needed to screen and support pupils who have been identified as being 'at risk' to prevent young people becoming 'NEET'.
60. Should the Council proceed with proposed development of the network of 7 Early Intervention Classes, this would require a revenue investment of £364,896 per annum (based on 2016 costs) plus an initial capital investment to adapt appropriate classrooms. The proposal is based on a reinvestment of resources which would be released from the closure of Meadowbank School. To retain Meadowbank while also opening the Early Intervention Classes, as suggested by some respondents, additional resources would need to be identified.
61. Consideration of developing Meadowbank as a provision for BESN is noted but is beyond the scope of this consultation.

## Formal responses from statutory and voluntary sector partners

62. Formal responses were received from Cardiff and the Vale Speech and Language Therapists, the Royal College of Speech and Language Therapists, Afasic, the Welsh Language Commissioner and the Social Services Directorate of Cardiff Council. The full responses are included in Appendix 2.
63. The points raised are set out in *italics* below. The paragraphs following these points contain the Council's response.
64. Therapists employed by Cardiff and the Vale University Health Board provided a collective response which included the following points:
- *A very positive collaborative working relationship has been established with the Education Service in recent years, with many joint initiatives and projects including setting up a mainstream speech and language therapy service to local primary and high schools.*
  - *Concern expressed that although many children with speech and language difficulties can be managed within mainstream settings, mainstream schools are not able to deliver highly specialised interventions to the most needy pupils*
  - *There should be some specific and specialist provision for the small percentage of children that require short-term, specialist, intensive speech and language intervention in the early years.*
  - *The school-based therapy service is currently a pilot established in response to feedback from parents and schools that they would prefer children to access this support in school, and was not intended to replace specialist provision. It has not been evaluated and therefore no conclusion has been reached on the future of this aspect of the therapy service.*
  - *The EICs do not appear to include the needs of children with severe speech and language difficulties.*
  - *Research shows that children with significant language impairment are at risk of behavioural difficulties, mental health problems, and of becoming offenders in adolescence and adulthood.*
  - *Speech Links and Language Links are screening tools only and do not provide a comprehensive language or speech sound assessment. The local authority should not over-rely on this data as an outcome measure for children with children with severe and complex language difficulties.*
  - *The increased demand for specialist provision for children with autism is acknowledged but there are concerns about whether there is scope to develop a suitable environment at Allensbank. For example, having enough space to create 'quiet' or 'sensory' areas.*
65. The Royal College of Speech and Language Therapists (RCSLT) made the following points:

- *There should be a focus on inclusion of children with special needs in mainstream settings but this should be balanced by a requirement for specialist services to be delivered flexibly in order to enable inclusion.*
- *In an inclusive society, specialist and targeted services for these children should be integral to universal mainstream provision. The integration of education, health and social care for children means they should be able to access all the services they require-whether universal, targeted or specialist, flexibly and locally wherever possible.*
- *In this response, RCSLT would wish to stress the need to ensure that children with speech language and communication difficulties in Cardiff receive the service that they need, which includes the availability of adequate specialist places within a given area.*
- *RCSLT would wish to see the availability of specialist resource bases with the philosophy of short-term intensive support with the outcome of returning to mainstream education.*

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

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

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

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

- *There is no information about how speech and language therapy will be offered as part of the proposed changes.*

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

- *The proposals acknowledge the importance of language to pupils and of addressing this in any reorganisation of SEN support*
- *The changes to school organisation must ensure that any internal or external support provided by the relevant agencies is available in Welsh. Educational psychology, specialist teaching and information for parents should be available in Welsh.*
- *Staff development planning is needed to ensure a sufficient number of special educational needs (SEN) staff who are able to provide support through the medium of Welsh.*

### **Appraisal of views expressed by statutory and voluntary sector partners**

69. It is acknowledged that the school-based service currently provided by the UHB speech and language therapists is a pilot scheme and has not yet been evaluated, and that it was not set up to replace specialist provision.

70. The Council notes the comments regarding a mainstream approach to support, including the need for adequate specialist places focused on short-term intensive support. The view that there is an ongoing need for some specialist provision for SLCN is shared by the majority of respondents. The Council will therefore give further consideration to this issue with a view to retaining some specialist provision for children with speech and language needs.

71. If the proposals were progressed, a range of training and development opportunities would be provided to ensure Allensbank Primary School is able to develop the skills and practice required to support pupils with autism spectrum conditions. The Central South Consortium also provide support to the school to ensure further improvement.

72. The point made about the need to consider extension of the specialist speech and language support service to improve the support available in mainstream schools is noted. Further consideration will be given to this point.

73. The Council does not agree that the proposals contradict the principles set out in Cardiff Council's Additional Learning Needs Strategic Framework. The principles are set out on page 9 of the consultation document and the proposal is consistent with these principles. Of particular relevance are the following:

- An effective graduated response to additional learning needs is underpinned by collaboration with health, children's services and other partners.

- With the right training, strategies and support, nearly all children with special educational needs can be successfully included in mainstream education.
- As far as practicable, provision for special educational needs should be locally based, to reduce the extent to which children travel to access education.

74. A response to the suggestion that the role of Meadowbank School could be developed to provide a mixture of short and long term places is set out in paragraph 29.

75. The need for staff development planning and to ensure external support services are available in Welsh is acknowledged. A range of continuing professional development opportunities are available to staff in English and Welsh language settings. The Educational Psychology Service delivers services in Welsh and English. A Welsh language audit has identified the need to increase Welsh language capacity in the specialist teacher team and will be addressed through planned recruitment.

### **Responses of staff, parents, pupils and other stakeholders**

76. Meadowbank Staff provided a collective response and a number of individual responses were received from Meadowbank staff and from other schools.

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

78. The responses included the following points:

- *There has been good capacity building in mainstream schools which has improved the speech and language support available for all children, and for those with communication delays.*
- *Mainstream schools do not have enough resources, staff or time to fully support children with the most needs.*
- *There are many children in mainstream schools who could benefit from the support of Meadowbank, but parents are not aware of the school and don't know what support would be available.*
- *The Day Class was a good way to provide intensive part time support and to assess whether a specialist placement was needed. This should be reinstated.*
- *The central team of 4.6 specialist teachers is inadequate to support all of the children who currently need direct support.*
- *The number of children being identified with SLCN is increasing in Cardiff: there is a need to ensure there is provision for these pupils.*
- *Responses from other staff included the following points:*
- *That the proposal is a cost-cutting exercise, at the expense of children with special educational needs.*
- *That more provision for children with BESN is needed, but the criteria and purpose of EICs is not sufficiently clear.*



79. Responses from parents and other family members of pupils and former pupils of Meadowbank School strongly opposed the closure of Meadowbank School. Their responses included the following points:
- *A special school placement has been essential to meet their child's needs.*
  - *Mainstream and SRB placements would not be able to offer the level of specialist support that has been provided by Meadowbank.*
  - *Some families cite experiences of social isolation and bullying prior to their child's admission to Meadowbank.*
  - *Parents value the support for the whole family provided by Meadowbank.*
  - *Families believe that parents do not have enough information about Meadowbank and urged the Council to 'advertise' the school more widely.*
  - *Many families refer to the day Class as a good way to have become familiar with the school prior to admission and suggest this should be reopened.*
80. A survey was used to seek the views of children and young people about their schools. Surveys were sent to the schools directly affected by the proposals and teachers were asked to help children to respond. The local authority speech and language team also invited a number of pupils attending secondary mainstream schools to respond.
- *All the responses reflected the children's positive feelings about their school and the support they receive.*
  - *The written or scribed responses from Meadowbank pupils reflect their positive experience of the school and in many cases the children record that they do not wish the school to close.*
81. A petition with 3078 signatories was received by the Council, opposing the closure of Meadowbank School.
82. 122 response forms were submitted opposing the proposal and expressing the view that Meadowbank School should not close.
83. Other responses from members of the public include the following points:
- *The Court Special School would benefit from better accommodation. If Meadowbank School closes, the Council should consider transferring the The Court School there.*
84. Responses were also received from Councillors, the Liberal-Democratic Group, local AMs and MPs, opposing the proposal to close Meadowbank. Their responses included the following points:
- *A recent research paper from Cambridge University argues that special schools remain a valid part of the education mix. The findings suggest that especially for children with severe learning*

*difficulties (SLD), special school provision still plays an important role.*

- *The belief of Afasic, the charity for adults and children with specific language disorders, in the effectiveness of special school provision provides expert endorsement of a special school model in the appropriate circumstances.*
- *Concern that the stated demand for “inclusion” may be driven by financial considerations rather than pupils’ needs.*
- *Children should not transfer to mainstream schools before they are able to learn the necessary communication skills to successfully integrate with their peers.*
- *The loss of expertise which the closure of Meadowbank would entail.*
- *Concern is expressed regarding the capacity of mainstream schools to support a wide range of needs.*
- *If Meadowbank were retained for speech and language, then redesignating Allensbank for ASC would be a positive move. If the Allensbank pupils transferred to Meadowbank, this would bring the school to capacity.*
- *Speech and language impairment is a lifelong condition that cannot be resolved in a short term placement of twelve months.*
- *The proposals state that the EICs will not have any impact on standards in mainstream, but they will surely impact on the host schools.*

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

85. The views expressed are noted.
86. A response to the view that there is an ongoing need for specialist provision for speech and language is set out in paragraph 26.
87. The assertion that parents are not informed about Meadowbank School is addressed in paragraph 48.
88. A number of respondents express the view that the Council should actively encourage parents who have named a mainstream school, to consider a place in Meadowbank School. The Council view is that such an approach would be contrary to the statutory responsibilities set out in the Education Act 1996, and the SEN Code of practice. Section 316A of the Education Act 1996 specifies that children with special educational needs should normally be educated in mainstream schools so long as this is compatible with receiving the special educational provision that their learning difficulty calls for; the efficient education of other children, and the efficient use of resources. This is also reflected in the Special Educational for Needs Code of Practice for Wales.
89. The Council is confident that there are effective processes in place to monitor the progress of children in mainstream, and ensure support is effective. However, in response to the concerns expressed by some

respondents, that there may be children in mainstream schools who are not making sufficient progress and for whom specialist placement would be appropriate, the Council will request the specialist speech and language team and the UHB therapy service to undertake a review of the mainstream caseload.

90. The Day Class was funded by a Welsh Government grant which ceased in 2012. The Council continues to fund an outreach service to support pupils with speech and language needs in nursery settings and has supported the development of universal screening in Reception to ensure needs are identified and met early.
91. The speech and language specialist service is a team of 8, comprising 4.6 teachers, 3 specialist teaching assistants and an education- employed therapist who works in both the speech and language team and behaviour support team. The speech and language team works collaboratively with speech and language therapists to support a shared caseload.
92. The Council rebuts the notion that the proposal is a cost-cutting exercise which will reduce provision for children with special educational needs. The proposal aims to reshape specialist provision in response to changing patterns of need. The majority of children with severe speech and language needs are well supported in mainstream schools and making progress there. Very few parents are requesting a specialist placement for a speech and language child. However, there are growing numbers of children experiencing behaviour emotional and social needs, for whom there is insufficient provision. If the proposal were progressed, resources released through closure of the special school would be reinvested in alternative SEN provision and support.
93. The criteria and purpose of EICs is clarified in paragraph 25.
94. The suggestion that The Court Special School could be transferred to the Meadowbank site is noted but is outside the scope of this consultation.
95. The research supporting the continued importance of special school places to support pupils with severe learning difficulties (SLD) is noted. The definition of SLD or 'severe learning difficulties' is a low cognitive ability or low IQ, resulting in severely impaired understanding and ability to learn. The Council maintains a range of special school and SRB places for children with severe or profound learning difficulties, including Ty Gwyn, Woodlands and Riverbank Special Schools and the SRBs at Llanederyn, Llanishen Fach, Bryn Hafod and Marlborough Primary Schools and the Council accepts the point that special schools are an important part of the range of inclusive provision for children with low cognitive functioning.
96. In contrast, Meadowbank Special School and Allensbank SRB are designated for pupils with specific language impairment (SLI), which

is defined as a disorder in the development of language, despite adequate intelligence and opportunity and in the absence of any associated disorders that may underlie the language difficulties, such as hearing loss, autism or learning disability. While SLI is a lifelong condition and may range from 'moderate' to 'severe', it is distinct from a 'severe learning difficulty' or SLD.

97. SLI is acknowledged to be a lifelong condition which would continue whatever support or placement is provided, whether this is in mainstream or a specialist placement. The aim for supporting a child with SLI in any setting is to enable them to develop strategies and skills to manage their impairment and fulfil their potential.
98. The endorsement of Afasic for a special school model for speech and language is noted. However, a range of alternative models are described positively by specialists, including the views of the Royal College of Speech and Language Therapists, summarised in paragraph 61, which describes a mainstream model of support, with 'sufficient specialist resource bases with the philosophy of short-term intensive support with the outcome of returning to mainstream education'.
99. A response to the concerns expressed about a loss of expertise is set out in paragraph 25.
100. The suggestion that if Allensbank SRB pupils transferred to Meadowbank this would bring the school to capacity is noted. However, this would not address the falling roll at both settings, as illustrated in paragraph 26.
101. The consultation document notes that establishing the EICs would not impact on standards. The pupils attending the classes would be dual registered and their learning outcomes and other data would continue to be recorded at their local school. There would be no impact on the data of the host school.

### **Summary of views expressed during the consultation and proposed way forward**

102. The initial proposal set out a significant reshaping of specialist provision to respond to the changing pattern of special educational needs and the increased capacity of mainstream schools to support special educational needs.
103. The proposed reshaping would maintain the current level of investment in specialist provision and support for special educational needs, while ensuring a better fit to the current pattern of need.
104. There has been an ongoing gradual decline in the number of parents who request a specialist speech and language placement for their child, which has resulted in a steady fall in the number of funded

places over many years, from 70 places prior to 2006; to 58 places in 2010, and to 34 places in November 2015.

105. The Council has responded to this shift in expectation by investing in mainstream support over several years. Work to build capacity for speech and language support began in 2010 and remains ongoing. The Council believes the fall in demand/ need for specialist places is a direct result both of parental expectations for mainstream inclusion and the capacity building work that has been done to meet needs more effectively in mainstream.
106. Alongside the changes affecting speech and language provision, there has been an increased demand for specialist provision for children with special educational needs such as autism spectrum conditions and behavioural emotional and social needs.
107. ESTYN recognised the rationale for responding to these pressures in its proposals for re-shaping provision by closing Meadowbank School, redesignating the SRB at Allensbank for ASC and developing a network of Early Intervention Classes.
108. In relation to support for speech and language needs, many respondents acknowledged the effectiveness of the work that has been undertaken in recent years to build capacity and skills in mainstream schools. This work has included a comprehensive training programme; universal early screening for speech and language needs; and a collaborative working relationship between Cardiff and the Vale UHB Speech and Language Therapy Service and the Specialist Teacher Service.
109. There is also a general acknowledgment among respondents, of the need for some change in the pattern of provision to support speech and language needs.
110. However, there is a strong consensus among stakeholders regarding the importance of continuing to maintain an effective range of specialist support for children with speech language and communication needs, and concerns that the proposal does not yet fully address this issue.
111. In particular, strong views have been expressed regarding the need to retain some designated specialist provision for children with the most severe speech and language needs.
112. Some respondents express the view that special school places should continue to form part of the range of specialist provision. Other respondents put more emphasis on the need for early intervention in the form of resource bases.
113. Given the strong views expressed by stakeholders it is deemed advisable for additional work to be undertaken to engage with

stakeholders more fully prior to bringing forward a revised proposal for consideration.

114. In developing a revised proposal, the relative benefits and costs of SRB and special school provision will need to be borne in mind. There is evidence to suggest that SRBs are a more efficient and effective means of delivering short-term or part-time support. The cost of an SRB place is between one third and one half the cost of a special school place, while the mainstream location of SRBs offers additional benefits for children of ongoing contact with mainstream peers and learning experiences.
115. In relation to support for behavioural emotional and social needs, many respondents acknowledged the growing demand for specialist provision for children presenting with behavioural emotional and social needs, and recognised that there are insufficient specialist places available to meet this need at present.
116. The Council agrees with this analysis and this factor was key reason for the proposal outlined.
117. However, there is not yet consensus about the criteria and purpose of Early Intervention Classes. Further work is therefore needed to clarify and develop this aspect of the proposal prior to bringing forward a revised proposal for consideration.
118. The initial proposal to develop a network of Early Intervention Classes was based on a reinvestment of the resources and skills that would be released by closure of Meadowbank School. In the absence of significant new investment, it would not be possible to proceed with these classes while also retaining Meadowbank School.

### **Scrutiny Consideration**

119. The Children and Young People's Scrutiny Committee considered the views of staff and parents of children at Meadowbank in relation to the proposal at their meeting on 17 May 2016. The views expressed by the Scrutiny Committee are set out in a letter to the Cabinet Member for Education attached at Appendix 4 these have been taken into account and the Cabinet Member's response is attached at Appendix 5. This report has been submitted for pre-decision scrutiny and will be considered at the meeting of the Children and Young People's Scrutiny Committee on Monday 11 July 2016.

### **Reason for Recommendations**

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

## **Financial Implications**

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

## **Legal Implications (including Equality Impact Assessment where appropriate)**

123. Section 316A of the Education Act 1996 specifies that children with special educational needs should normally be educated in mainstream schools so long as this is compatible with receiving the special educational provision that their learning difficulty calls for; the efficient education of other children, and the efficient use of resources. This is also reflected in the Special Educational for Needs Code of Practice for Wales.
124. Parental preference refers to the obligation under section 86 of the School Standards and Framework Act 1998, which requires a local authority to make arrangements enabling the parent of a child to express a preference as to the school at which they wish education to be provided for his child and to give reasons for his preference. The preference expressed must be taken into consideration in relation to the statutory assessment process when statements of special educational needs are prepared. However, the type of provision will also be based upon the professional advice given and is individual to each child according to their needs.
125. Any proposal to establish a community school or to discontinue a community school and to make changes to special educational needs provision at a school may be considered as a regulated alteration to a school under Sections 41 and 43 of the School Standards and Organisation (Wales) Act 2013.
126. Section 48 of the 2013 Act requires that any proposal in respect of a regulated alternation regulated alteration must first be consulted upon and then a formal notice published in accordance with the Schools Organisation Code.

127. Under the Code the Authority is required to take into account certain factors in formulating proposals and those factors are referred to in the text of this Report.
128. The Council also has to satisfy its public sector duties under the Equality Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties, Councils must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics.
129. Protected characteristics are:
- Age
  - Gender reassignment
  - Sex
  - Race – including ethnic or national origin, colour or nationality
  - Disability
  - Pregnancy and maternity
  - Marriage and civil partnership
  - Sexual orientation
  - Religion or belief – including lack of belief
130. The information from the consultation process will need to feed into an Equality Impact Assessment. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty.
131. The Cabinet must make a final determination of the proposals after any statutory notices are published, an objection period of 28 days is allowed, within 16 weeks of the end of the objection period.

## **HR Implications**

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



## RECOMMENDATIONS

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

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

### **Nick Batchelar**

Director

8 July 2016

*The following appendices are attached:*

- Appendix 1 – Consultation document
- Appendix 2 – Formal responses
- Appendix 3 – Statutory Screening Tool
- Appendix 4 – Letter from Children & Young People Scrutiny Committee dated 24 May 2016
- Appendix 5 – Response to letter from Children & Young People Scrutiny Committee dated 8 July 2016

# 21st Century Schools Consultation Document 2016

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

11 February - 23 March 2016



This document can be made available in Braille. Information can also be made available in other community languages if needed. Please contact us on 029 2087 2720 to arrange this.





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## 1. Introduction

This consultation is an opportunity for people to learn about the school organisation proposal put forward in relation to specialist provision for pupils with special educational needs (SEN) in Cardiff. It is your chance to ask questions and make comments that will be considered when the Council decides how to proceed.

Before any decisions are made the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposal known.

Our consultation process therefore follows Welsh Government guidelines outlined in the School Organisation Code 2013 and a range of individuals and groups are being asked for their views about these proposals.

Table 1 sets out details of the groups the Council is consulting:

Children and young people	All Cardiff schools
Parents/ carers	Cardiff and the Vale University Health Board
School staff	Voluntary Sector Organisations
School Governing Bodies	Neighbouring Authorities
Local residents	Welsh Ministers
Local Members/ Assembly Members/ Regional Assembly Members/ Members of Parliament	Police and Crime Commissioner
Diocesan Directors of Education	Central South Consortium Joint Education Service (CSCJES)
Trade Unions	Welsh Language Commissioner
Estyn	Rhieni dros Addysg Gymraeg (RHAG)
Cardiff and Vale College	

## 2. How you can find out more and give your views

Public meetings and drop in sessions have been arranged where the proposals will be explained. These are provided so you can ask questions and make comments that will be recorded. You may also provide your views in writing.

Information regarding this proposal will be available to view at all Cardiff maintained schools.

Details of the consultation meeting dates are given in table 2 below:

<b>Nature of Consultation</b>	<b>Date/ time</b>	<b>Venue</b>
Cardiff Headteachers	4 <sup>th</sup> March, 9-10am	Future Inn, Cardiff Bay
Governors meeting	7 <sup>th</sup> March 6.45pm	Meadowbank School
Parents meeting	25 <sup>th</sup> February, 2-3pm	Meadowbank School
Staff meeting	25 <sup>th</sup> February, 3.45pm	Meadowbank School
Governors meeting	7 <sup>th</sup> March, 5.30pm	Allensbank Primary

		School
Parents meeting	24 <sup>th</sup> February, 2-3pm	Allensbank Primary School
Staff meeting	24 <sup>th</sup> February, 3.30pm	Allensbank Primary School
Governors meeting	15 <sup>th</sup> March, 6pm	Fairwater Primary School
Parents meeting	23 <sup>rd</sup> February, 2-3pm	Fairwater Primary School
Staff meeting	23 <sup>rd</sup> February, 3.30pm	Fairwater Primary School
Governors meeting	23 <sup>rd</sup> February, 4.30pm	Glan yr Afon Primary School
Staff meeting	24 <sup>th</sup> February, 3.30pm	Glan yr Afon Primary School
Governors meeting	17 <sup>th</sup> March, 6.30pm	Springwood Primary School
Staff meeting	17 <sup>th</sup> March, 3.30pm	Springwood Primary School
Drop in session (West of the city)	1 <sup>st</sup> March, 1-2pm	Ely and Caerau Hub
Drop in session (East of the city)	2 <sup>nd</sup> March, 2-3pm	Rumney Hub
Public meeting	16 <sup>th</sup> March, 6-7.30pm	Ysgol Glantaf

In addition, workshops will be arranged with pupils and young people to provide an opportunity for pupils to ask questions, learn more about the proposals and give their views.

### 3. Your Views Matter

Your views matter and we want you to tell us what you think about the proposal. You can do this by attending one of the meetings or drop in sessions above, and/or by completing the online form [www.cardiff.gov.uk/21stcenturySchools](http://www.cardiff.gov.uk/21stcenturySchools)

Alternatively, contact the School Organisation Planning Team on (029) 2087 2720, by email to [schoolresponses@cardiff.gov.uk](mailto:schoolresponses@cardiff.gov.uk) or by post to Room 422, County Hall, Atlantic Wharf, Cardiff, CF10 4UW.

The closing date for responses to this proposal is 23 March 2016.

### 4. Explanation of terms used in this document

Please note the following terms used throughout this document:

**SEN** – Special Educational Needs. A child has SEN if he or she has learning difficulties which require special educational provision to be made for him or her. A learning difficulty means that the child has significantly greater difficulty in learning than most children of the same age or that the child has a disability that needs different educational facilities from those that the school generally provides for children.

**School Action (SA)** - When the class or subject teacher identifies that a pupil has SEN they provide interventions that are additional to or different from those provided as part of the school's usual curriculum.

**School Action Plus (SA+)** - When the class or subject teacher and the SEN Co-ordinator are provided with advice or support from outside specialists, so that alternative interventions additional or different to those provided for the pupil through School Action can be put in place.

**Statemented** – A small number of pupils with SEN may need a place in a Special School or a Specialist Resource Base, or they may need extra funded support in their local school. These children will usually have a statement of special educational needs, which describes their needs and their strengths and sets out what support must be in place to make sure they make progress in their learning. The statement will also name the school they attend and any extra resources provided for the pupil.

**Specialist Resource Base (SRB)** - A small class (usually between 8 and 10 pupils per class) in a local mainstream school, funded by the local authority for pupils with significant SEN. Specialist Resource Base classes are taught by specialist teachers and specialist learning support assistants, but pupils also have opportunities to integrate with mainstream peers and are fully included in the life of the school. All pupils attending a Specialist Resource Base have a statement of SEN, and usually have significant, long term special educational needs.

**Revolving Door Class (RD) / Nurture Class** - Small classes similar to a Specialist Resource Base in terms of size, location and staff expertise, which can provide a short term placement for vulnerable learners. Pupils do not usually have a statement of SEN but are placed temporarily in the RD or Nurture class because they are struggling to cope in their local school due to their behavioural, social and emotional needs. Pupils attend on a temporary basis, while also remaining on the roll of their local school. Pupils re-integrate to their local school following the placement.

**Early Intervention Class** – this is the term being used to describe a new initiative in Cardiff. A detailed description of the proposed purpose, function and outcomes of early intervention classes are set out in sections 15-20 of this document.

**Statutory Notice** - A statutory notice is the formal publication of a finalised proposal, if approved by Council's Cabinet and will only be considered once the Cabinet have received a report on all the responses from the consultation. This is a legal requirement as outlined in the School Organisation Code 2013.

## **5. Background to the proposal**

### **5a. Support for speech and language needs in Cardiff**

Meadowbank School is a small Special School located in Gabalfa adjacent to Gabalfa Primary School and Ysgol Glan Ceubal, for children aged 4-11 with significant speech and language difficulties.



Historically the Vale of Glamorgan Council funded 10 places at the school and at that time the school operated at 40 places. In 2010, the Vale of Glamorgan gave notice of their intention to withdraw from this arrangement, making no new placements. In July 2015 the last Vale child left the school. The number of Cardiff pupils admitted to the school has also fallen over the last five years, and there are now 23 pupils on the school roll.

Cardiff also maintains a Specialist Resource Base (SRB) at Allensbank Primary School, for 20 pupils with speech and language difficulties. Admissions have fallen since 2010 and there are now only 11 pupils attending the base.

The Speech and Language Therapy Service provides school-based therapy to pupils in Meadowbank and Allensbank in line with their assessed level of need.

Admissions to Meadowbank Special School and to Allensbank SRB are subject to a statement of special educational needs (SEN) and are managed by the local authority in accordance with the SEN Code of Practice for Wales 2002.

In line with equalities legislation and the statutory framework for SEN, children are only placed in a Special School or Specialist Resource Base where this is:

- consistent with parents' wishes and
- if there is substantial evidence to show that their needs cannot reasonably be met other than by placement in a specialised setting.

The prospects for pupils with speech and language difficulties to be reintegrated to mainstream school are good; the 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 age.

There has been a trend away from Special School places for speech and language needs as part of a national trend towards inclusion. Cardiff is the only local authority in England and Wales still maintaining a Special School specialising solely in speech and language needs.

While Special School continues to be an important option for some children with complex, long term learning difficulties, there has been a growing national trend for children with moderate learning delays, speech and language difficulties and physical disabilities to attend a local school. This trend is also reflected in Cardiff.

## **5b. Changes in demand for Special School and SRB places**

Although the number of children and young people with speech and language difficulties has not fallen, demand for places at both Meadowbank Special School and Allensbank SRB has reduced in recent years.

At the present time (figures from November 2015) there are 22 pupils on roll at Meadowbank Special School. Demand for places at Allensbank SRB has also fallen from 18 pupils in 2010-11, to 11 pupils in November 2015. This trend is illustrated in Table 1 below.

**Table 1: Meadowbank and Allensbank Specialist Resource Base numbers on roll, 2010-2015**

	<b>Meadowbank</b>	<b>Allensbank</b>	<b>Total pupils</b>
2010-11	40	18	58
2011-12	35	18	53
2012-13	34	13	47
2013-14	32	16	48
2014-15	27	14	41
November 2015	23	11	34

Admissions have been falling for a few years with the result that there are now very few Foundation Phase pupils in either setting. There were no admissions to either setting in September 2015. The current age profile is illustrated in Table 2 below.

**Table 2: Age profile of pupils in speech and language provision**

	<b>Meadowbank</b>	<b>Allensbank</b>	<b>Total</b>
Reception	0	0	0
Year 1	2	0	2
Year 2	4	4	8
Year 3	3	2	5
Year 4	2	2	4
Year 5	6	3	9
Year 6	6	0	6
	23	11	34

The table shows that there are now only 10 Foundation Phase pupils attending Meadowbank and Allensbank SRB, and 24 Key Stage 2 pupils.

As the number of pupils has fallen, the therapy allocation to Meadowbank Special School and Allensbank SRB has been reduced in order to provide more support for pupils in mainstream schools.

### **5c. Why has the need for Special School and SRB places fallen?**

The trend does not arise from a reduction of need, but from changing expectations and from the availability of effective mainstream support.

The following factors are explored in more detail below:

- There is a national trend towards more inclusive educational practice;
- A successful programme of early intervention and capacity building has been implemented in Cardiff's mainstream schools;
- Between September 2014 and July 2015, the therapy service rolled out a school-based therapy service, in place of the clinic-based model;
- Pupil outcomes for children with speech and language difficulties in mainstream are good.

### **5d. National trend for inclusion**

The trend away from Special School places for speech and language needs is part of a national trend towards inclusion. The majority of children attending a Special School now have severe and complex needs and are likely to benefit from a specialist education throughout their school life.

In contrast, children with specific speech and language difficulties have good prospects for succeeding in mainstream education provided they receive effective specialist support when young. Increasingly, this support can be provided effectively in a mainstream context.

Pupils who attend Meadowbank Special School or Allensbank SRB typically transfer to mainstream secondary schools. It can be very challenging for pupils to transfer directly from a small special class to a large mainstream secondary school in one step. The local authority undertook consultation with Meadowbank Special School and Allensbank SRB parents in 2012, to identify the best way of supporting transition to secondary school.

There were two main outcomes from this consultation:

- The capacity of the Specialist Teacher Team was increased in order to provide more support for transition and for secondary pupils in mainstream; and
- Both Allensbank and Meadowbank schools began working towards earlier reintegration to mainstream. Many pupils now have the chance to reintegrate to a local primary school and to establish friendships there before transferring to secondary school.

In the past, a significant factor in the choice of the Special School or SRB was that these settings were the only schools where school-based therapy was provided and where therapists and teachers worked closely together to provide support. Children who remained in their local mainstream school would be obliged to miss school on a regular basis and travel to a clinic to receive therapy. Direct contact between therapists and mainstream teaching staff was often minimal and varied from one area to another.

With the roll out of a school-based therapy service in 2014-15, pupils included in mainstream are no longer disadvantaged in terms of access to therapy and there are additional benefits to remaining in the local school:

- The child experiences fewer transitions;
- Local friendships;
- Good role models to support the child's speech and language development.

## **5e. Early intervention and capacity building in Cardiff**

Since 2010, a strategic programme of capacity building and early intervention has significantly improved the extent to which children with speech and language difficulties can be well-supported in their local mainstream school.

The Specialist Teacher Speech and Language Team provides effective support, training and advice to mainstream schools and provides direct teaching intervention to pupils with the most severe difficulties.

Using the ‘Speech Links’ and ‘Language Links’ programmes, primary schools assess the language development of all children entering Reception and use a range of strategies and interventions to address any language delays identified. This approach has been effective in improving the language skills of children by an average of 20 percentage points during the Reception year. The quality and timeliness of therapy referrals has also improved, with a positive impact on reducing therapy waiting times.

Speech Links and Language Links have been established in all but one primary school in Cardiff and are now being rolled out across secondary schools.

Joint working between Cardiff and the Vale University Health Board (CVUHB) Speech and Language Therapy Service and the Education Service has led to improved support for children with speech and language difficulties. Speech and language therapists work closely with the specialist teacher team to deliver the five stage graduated response, with a single referral pathway and a shared caseload. This approach has led to less duplication and a more efficient and effective service. The partnership between health and education in Cardiff was awarded an NHS prize for innovative practice in 2014.

**5f. School-based therapy service (introduced in Cardiff between September 2014 and July 2015)**

In 2014-15, the Speech and Language Therapy Service established a school-based therapy service, with a range of benefits:

- Children in mainstream education are no longer disadvantaged in comparison to Special School or SRB pupils, as now they do not have to travel to a clinic to access therapy;
- School-based therapy is more accessible for families without their own transport and children do not miss school in order to attend the clinic;
- There are stronger links between schools and the therapy service, with therapists providing direct advice to class teachers and teaching assistants to enable them to deliver and oversee programmes.

The school-based service was rolled out in the Vale of Glamorgan a year earlier than in Cardiff. Data collected by CVUHB demonstrates that the school-based service has led to fewer pupils being discharged early due to non-attendance at clinic. Early signs suggest that the same benefits are being realised in Cardiff.

A breakdown of the therapy caseload demonstrates that the majority of speech and language children are now being supported in mainstream schools. This is illustrated in Table 3.

**Table 3: Therapy caseload by level of need (Stage 5 being the highest level of need), June 2015**

	Meadowbank	Allensbank	Mainstream	Total
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		<b>Specialist Resource Base</b>		<b>caseload</b>
<b>Stage 5 (direct input)</b>	7	1	48	56
<b>Stage 4 (direct input)</b>	11	12	188	211
<b>Stage 3 (monitoring)</b>	7	2	249	258

### 5g. Outcomes for pupils in mainstream education

Pupils in mainstream education are achieving their measurable targets. These targets are jointly set between education and health. Progress is also measured via the Speech and Language Link screening tools and school-based attainment progress. This is illustrated in Table 4 below, which sets out the results of pre- and post- intervention screening in Reception.

**Table 4: Data showing the increase in reception age pupils with age appropriate Language Skills and the progress they make over the academic year**

<b>Year</b>	<b>2010- 2011</b>	<b>2011-2012</b>	<b>2012-2013</b>	<b>2013-2014</b>	<b>2014-2015</b>
<b>Pre Screen</b>	63.8%	57.2%	69%	63.8%	67.5%
<b>Post Screen</b>	84%	80.1%	83%	83.7%	84.9%
<b>% point increase</b>	20.2	22.9	14	19.9	17.4

### 6. Changing need for Special School, Specialist Resource Base and early intervention provision for other areas of SEN

A review of specialist provision for pupils with SEN was completed in 2013. This identified a number of priorities for future development of Special School and SRB provision, including the need to create additional places for:

- Complex learning difficulties
- Autism Spectrum Conditions
- Behavioural, emotional and social difficulties

Demand for Special School or SRB places for primary aged children presenting with challenging behaviours has increased over the last two years. In 2014-15 there was a 30% increase in the number of new statements for this area of need.

In March 2014 a focus group of Headteachers, health professionals, children's services and parent partnership representatives was consulted on the priorities for future development of behavioural, emotional and social difficulties provision in Cardiff.

There was consensus on the need for:

- Additional capacity for early intervention such as Nurture Classes and Revolving Door classes;
- Greater emphasis on the underlying needs experienced by this group including: mental health and medical needs; speech and language difficulties; literacy and numeracy delays.

Extending capacity for early intervention for pupils with behavioural emotional and social difficulties is therefore a high priority for Cardiff. The need to plan for future expansion of provision for Autism Spectrum Conditions and for complex learning difficulties is also a priority.

## **7. A Strategic Approach to Improving SEN Provision**

In 2015, the Education Strategic Group discussed and agreed an Additional Learning Needs (ALN) Strategy which sets out the principles and high level actions for developing SEN provision through School Organisation Planning.

The Strategy sets out the following principles:

- All children should have access to an appropriate education that affords them the opportunity to achieve their personal potential.
- An inclusive approach to education incorporates the views of parents and children, and recognises the wider needs of vulnerable families.
- An effective graduated response to additional learning needs is underpinned by collaboration with health, children's services and other partners.
- With the right training, strategies and support, nearly all children with special educational needs can be successfully included in mainstream education.
- Children in Welsh and English medium education should have equitable access to specialist learning provision.
- As far as practicable, provision for special educational needs should be locally based, to reduce the extent to which children travel to access education.
- Mainstream education will not always be right for every child all of the time: a high quality range of Learning Resource Bases and Special Schools should be maintained in order to offer excellence and choice for all children.
- Special Schools should function as 'Centres of Excellence' providing a high quality learning environment for children with a complex range of needs, and sharing expertise with their mainstream partners.
- The interests of all pupils must be safeguarded.

These principles underpin the current proposal.

## **8. Early Intervention Classes**

Cardiff Council is therefore proposing to develop a network of 7 Early Intervention Classes across the city. This would significantly increase capacity to support primary aged pupils who are vulnerable to exclusion due to their social emotional difficulties.

The goal would be for each of the six neighbourhood areas to have an Early Intervention Class to provide places for children in the Neighbourhood. In addition, a Welsh medium EIC would provide places for children in the Welsh medium sector.

The existing 'Revolving Door' class at Glan yr Afon Primary School, the Specialist Resource Base at Fairwater Primary School and the 'Nurture Class' at Springwood Primary School would cease to operate as they do at present and become part of the network of Early Intervention Classes.

In addition the Local Authority would establish four new Early Intervention Classes including one in a Welsh medium school.

### **8a. Purpose of an Early Intervention Class**

- To provide intensive assessment and short term support for children displaying significant difficulties due to attachment disorders; language, literacy and numeracy delays; poor social skills and understanding; challenging social circumstances; emotional difficulties.
- Work in collaboration with parents/ carers, educational psychology, specialist support services, health, children's services and other partners.
- Establish and implement an Individual Development Plan.
- Work in partnership with the child's local school to enable successful reintegration.
- Support the development of positive relationships between home and school.

### **8b. Processes**

- Placement decisions will be made by panels of Headteachers and professionals.
- Consent of parent/ carers must be obtained before a referral is made.
- The views of parents/ carers and the child must be sought and will inform the placement decision.

### **8c. Criteria**

Placement in an Early Intervention Class will be considered when there is evidence that:

- Despite sustained, relevant and purposeful action to support them, the child is unable to settle and learn in a mainstream classroom.
- The child has good potential for reintegrating and succeeding in mainstream with the right support.

### **8d. Operation**

- Children will be dual registered in their local school and the EIC school.

- Placements will be for 3-4 terms, with phased reintegration undertaken over the course of the placement.
- Ongoing multi disciplinary assessment to identify the child's strengths and needs.
- Every child will have an Individual Development Plan.
- Team Around the Family plans where appropriate.
- A plan for supporting and developing capacity at the local school, to enable successful reintegration.
- The local school will contribute to cost of the placement.
- Educational Psychology Service and Specialist Teacher Services will contribute to assessments, support and advice to both the EIC school and the local school, provide training and support to the local school as identified in plans.

### **8e. Neighbourhood Approach**

It is anticipated that once the full network of 7 EICs 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.

### **9. The proposal**

To respond to the falling demand for speech and language places and the increased demand for provision for other areas of special educational need, the Council is now consulting on the following proposals:

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, 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.

## 10. School Capacities, Condition and Suitability of School Buildings

Table 5 below provides details of school capacities and information regarding the condition and suitability of school buildings

<b>Capacity, condition and suitability of schools affected by the proposals</b>				
Name of School/Age Range	Language medium/ Category of school	Condition Category as identified by 21 <sup>st</sup> Century Schools Survey	Current Published Capacity (age 4-11)	Published Capacity (nursery part-time places)
Meadowbank School (4-11)	English-medium (Special)	Satisfactory	40	0
Allensbank Primary School (3-11)	English-medium (Community)	Satisfactory	300	64
Fairwater Primary School (4-11)	English-medium (Community)	Satisfactory	283	0
Glan yr Afon Primary School (3-11)	English-medium (Community)	Satisfactory	292	64
Springwood Primary School (3-11)	English-medium (Community)	Poor	420	48

## 11. Location of Schools affected by the proposals

The location of each of the above schools can be seen on the map below:



## 12. How would other schools be affected?

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 is anticipated 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.

**Table 6 below illustrates the number of pupils on roll at schools affected by the proposals and the projected number of pupils on roll should the proposals proceed/not proceed**

School	January 2010 (NOR)	January 2011 (NOR)	January 2012 (NOR)	January 2013 (NOR)	January 2014 (NOR)	January 2015 (NOR)	2015/2016 Projection	2016/2017 Projection	2017/2018 Projection	2018/2019 Projection	2019/2020 Projection
Meadowbank School	41	40	35	34	30	29	23	17	11	9	6
Allensbank Primary School	139	165	218	231	242	252	267	270	286	272	267
Fairwater Primary School	206	216	205	201	211	205	227	233	229	229	217
Glan yr Afon Primary School	152	143	138	134	151	156	163	178	181	173	168
Springwood Primary School	160	154	129	160	158	178	177	186	176	183	173

### 13. Interim arrangements

Changes would be carefully planned in consultation with parents and professionals to take account of the needs of pupils attending each of the affected settings, to minimise disruption to their learning and to take full account of parental views.

#### Meadowbank pupils

The proposed closure date for Meadowbank Special School is the end of the academic year 2017. The majority of current pupils would have transferred to secondary school or reintegrated to a mainstream primary by that date. Remaining pupils would be offered a range of options, depending on their needs and on parents' views.

The options would include:

- Transfer to the SRB at Allensbank, which will continue to be a speech and language SRB until the current pupils have transferred to secondary school.
- A supported programme of reintegration to their local mainstream school. This would include funded additional support from an appropriately trained Teaching Assistant, school-based therapy if this continues to be an assessed need; support from the Specialist Teacher Service. Many Meadowbank pupils have taken this step over the last few years and it has proved more successful and an easier transition for the pupil than reintegrating to mainstream education at the end of year 6.

#### Allensbank Specialist Resource Base pupils

The proposed change of use of the SRB at Allensbank Primary School would be timed to take account of the needs and ages of existing pupils. The classes would continue to operate as a speech and language specialist setting until the current pupils move on, including any pupils who may transfer from Meadowbank.

Even if all Meadowbank pupils transfer to the Allensbank place, there will be capacity to begin admission of pupils with Autism Spectrum Conditions from September 2018. This is illustrated in the table below:

Year	Projected number of speech and language pupils in Allensbank SRB	Available places
2017-18	19	1
2018-19	15	5
2019-20	10	10

During the period of transition, there may be a period of 2-3 years when the SRB would operate mixed classes of pupils with speech and language needs and Autism Spectrum Conditions. Classes for a range of needs operate successfully in many Cardiff schools and in other local authorities. However, care would be taken not to compromise the quality of support by placing pupils with incompatible needs together.

### **Fairwater Specialist Resource Base pupils**

The proposed change of use at Fairwater Primary School, from an SRB for statemented pupils, to an Early Intervention Class, could be phased in over time, with some statemented pupils continuing to be taught alongside new admissions on the early intervention programme. As the needs of all pupils would be similar, the mixed arrangements would not have a detrimental impact on the pupils.

It is possible that the processes of supported reintegration for pupils admitted on the early intervention programme, could enhance the prospects for some statemented pupils to reintegrate to mainstream schools.

### **Glan yr Afon 'Revolving Door' class**

The 'Revolving Door' class at Glan yr Afon Primary School currently admit pupils for a one term programme, after which they return to their local school or transfer to more specialist provision. There would therefore be no implications for current pupils.

### **Springwood 'Nurture Class'**

The 'Nurture Class' at Springwood Primary School currently admit pupils for a three to four term programme, after which they return to their local school or transfer to more specialist provision. This is the same placement pattern as that planned for the early intervention classes so there would be no implications for current pupils.

## **14. Quality and Standards**

The Council works closely with the governing bodies of schools to ensure that standards in schools are high, that teaching is good and that leadership and governance is strong. The Council works closely with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty's Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under Section 104 of the Government of Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.

Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority has commissioned the Consortium to support and challenge schools in Cardiff.

When proposing changes of this type to schools, Local Authorities are required to refer to the most recent Estyn reports, other evidence derived from performance monitoring and any other information available on a school's effectiveness.

They must also demonstrate the likely impact of the proposals on the quality of:

- outcomes (standards and wellbeing);

provision (learning experiences, teaching, care support and guidance, and learning environment);and

- leadership and management (leadership, improving quality, partnership working and resource management).

## **Estyn**

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn)

The relevant Estyn Inspection reports provide grades against Key Questions and provide schools with recommendations for improvement.

Estyn inspection carried out after September 2010, provide judgements against three Key Questions.

Each key question is provided with a judgement:

Excellent – many strengths, including significant examples of sector-leading practice

Good – many strengths and no important areas requiring significant improvement

Adequate – strengths outweigh areas for improvement

Unsatisfactory – important areas for improvement outweigh strengths

## **Welsh Government categorisation of schools**

In 2014 the Welsh Government introduced a new categorisation system that considered each school's standards alongside the school's capacity to improve so as to understand the level of support that organisations such as the CSCJES need to provide to each school in order that they achieve their targets.

The categorisation system is described in Table 7 below:

Category	What the category means
Green	A highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement.
Yellow	An effective school which is already doing well and knows the areas it needs to improve.
Amber	A School in need of improvement which needs help to identify the steps to improve or to make change happen more quickly.
Red	A school in need of greatest improvement and will receive immediate, intensive support.

To determine the colour coded category as explained in the table above, schools are placed in one of four groups for standards (1-4) and for bringing about improvement (A-D) with one being the highest grouping for standards and A being the highest for improvement capacity.

For further information about the new categorisation scheme, please see Welsh Government's parents' guide to the National School Categorisation System:

<http://gov.wales/docs/dcells/publications/150119-parents-guide-en.pdf>

### **Meadowbank Special School**

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.

### **Allensbank Primary School**

Allensbank Primary School was last inspected in December 2013. The school's performance was judged to be adequate with prospects for improvement judged to be adequate.

In February 2015, the school was judged to have made sufficient progress and was removed from the list of school requiring significant improvement.

The Welsh Government has classified the school as Red.

### **Fairwater Primary School**

Fairwater Primary School was last inspected in July 2013. The school's performance was judged to be adequate with prospects for improvement judged to be adequate.

In November 2015, the school was judged to have made sufficient progress and was removed from the list of schools requiring significant improvement.

The Welsh Government has classified the school as Red.

### **Glan yr Afon Primary School**

Glan yr Afon Primary School was last inspected in January 2015. The school's performance was judged to be adequate with prospects for improvement judged to be good.

The Local Authority will monitor the school's performance.

The Welsh Government has classified the school as Red.

## **Springwood Primary School**

Springwood Primary School was last inspected in September 2012. The school's performance was judged to be good with prospects for improvement judged to be adequate.

In December 2013, the school was judged to have made good progress and was removed from the list of schools required Estyn monitoring.

The Welsh Government has classified the school as Yellow.

### **Standards**

The Council's aim is to provide good quality SEN support in both English-medium and Welsh-medium across the city. All children and young people in Cardiff should be educated in environments that are fit for purpose, in the right place to enable the effective delivery of first class education.

The Council has in place policies to support school improvement e.g. 'High Achievement for All' and 'Achievement for Inclusion'. It is working to respond to the key principles of the School Effectiveness Framework to secure better learning outcomes and well-being for all children including those at the schools which form part of these proposals.

It is acknowledged that there are differing standards at the schools included in these proposals and support specific to the needs of each school is in place and will continue to be provided as appropriate with a view to raising standards and improving outcomes for all.

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 of education or the delivery of the Foundation Phase and in each key stage of education at any of the schools.

### **Provision**

The number of pupils requiring SEN support is increasing that the changes to existing SRB provision/establishment of additional SRB provision will ensure the availability of appropriate English-medium and Welsh-medium capacity.

### **Leadership and Governance**

The Council will work with the leadership of any school affected by the proposals to develop a rigorous whole school approach to improvement planning and secure good relationships with parents and other partners in order to ensure pupils receive a high quality education.

Careful planning will take place during the proposed period of change to avoid any risk of distraction or disruption to leadership and governance that could impact on educational outcomes.

The LA has no information to suggest that the Quality and Standards of existing schools would be negatively affected by the proposals.

### **15. What are the benefits of these proposals?**

The proposal would offer the following educational benefits:

- Reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream education throughout their education.
- Significant expansion of Early Intervention Classes for vulnerable learners with social and emotional needs, attachment difficulties and mental health needs. This will strengthen the graduated response to SEN. It will increase the number of children who can be successfully included in their local school.
- Additional provision in the Welsh medium sector. An Early Intervention Class will supplement the SRB provision currently available in Welsh medium.
- An increased number of SRB places for children with complex learning difficulties, and with Autism Spectrum Conditions, in line with projected needs.

### **16. Potential disadvantages of the proposals**

- A 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, there would be sufficient time to plan and support a transition to ensure as much consistency as possible. Parents would be fully consulted on the appropriate school for their child, and the support that would need to be in place. Places in Allensbank SRB would be available for every Meadowbank child if this is parental preference, although it is anticipated that some may choose a local mainstream school.
- A few pupils at Allensbank and Fairwater SRB's could be affected by the changes during the period of transition. Although they would not need to change school, the resource bases may begin to admit pupils with a different set of needs, while some current pupils are still attending. Care would be taken to ensure that any transition arrangements are appropriately staffed, and that the needs of each child would be appropriately met.

### **17. Risks associated with these proposals**

- Failure to secure sufficient growth in the number of Early Intervention Classes and Specialist Resource Bases to meet the growing demand for children with additional needs could affect the wellbeing and progress of some children.
- The number on roll at Meadowbank Special School and Allensbank Specialist Resource Base is falling steadily and projected to fall further. If action is not



taken, there is a risk that both settings could become too small to deliver education effectively to the remaining pupils.

## **18. Alternatives considered**

The option of keeping Meadowbank open as a speech and language Special School has been considered however this is not considered viable. The school roll has fallen consistently over the last five years and there is no expectation that the trend will reverse. This places the future of the school at risk even if no action is taken.

## **19. Admission arrangements**

Admission to Specialist Resource Bases and Special Schools are currently through a statement of special educational needs. The draft Additional Learning Needs Bill proposes changes to this statutory framework, and would replace statements with Individual Development Plans (IDPs). As yet there is no guidance on how admission arrangements will be affected, although it is likely that the process will be similar to the current system.

Temporary 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.

## **20. Financial matters**

All Cardiff schools are funded from the delegated schools budget which is a ring fenced account that allocates funding to each school using the Formula Funding Mechanism. The Formula Funding Mechanism is primarily based on a pupil number basis for Primary and Secondary schools and on a place basis for Special Schools and Specialist Resource Bases (SRB's).

In this particular instance, the phased reduction of the number of places at the Special School will result in a corresponding reduction in the amount of funding being provided to this school. The school is currently operating within its delegated budget and maintains a surplus balance despite falling number of places. However this may not continue to be the case should pupil numbers continue to fall. Using the revised number of places a financial profile of the school for the forthcoming medium term is required in order to establish whether or not the school will be in deficit at any point. In the event of the financial profile indicating a deficit then there will be a need to identify an appropriate source which would bridge the gap. Consideration also needs to be given to the governance arrangements of the school when financial viability becomes a clear risk.

The need for some additional places in some SRB's has been identified and the funding for these will be found from the amount released from the reduction in places in Meadowbank Special School. There will also need to be consideration of any other financial impact on schools as a result of increasing capacity in order to ensure that schools are appropriately funded. This proposal is likely to generate savings for

the delegated schools revenue budget but this cannot be effectively quantified at this stage and will need to be considered in detail.

Once identified, there will be a need consideration of the site currently occupied by Meadowbank Special School in terms of potential capital receipt or alternative use.

## **21. Human Resources matters**

A Human Resources Framework has been produced in consultation with key stakeholders including headteachers, governors, representatives of the diocesan authorities and the trade unions. It provides the basis for managing the human resources issues associated with School Organisation Planning and its purpose is to support governing bodies and staff working in schools, through a variety of strategies and with the ultimate aim of minimising compulsory redundancies across schools in Cardiff.

In the period leading up to the closure of a school, as pupil numbers reduce, the impact on the school budget and staff resources will need to be managed through the School's Redeployment and Redundancy Policy and Procedure, which has been developed in consultation with trade unions and key stakeholders. The Council will also support the Headteacher and governing body during this time, as they will need to ensure that staff continue to be supported and motivated during what may be a potentially difficult situation and the Headteacher is able to manage recruitment and retention of employees.

A key aspiration for the Council is to achieve staff reductions as far as possible through redeployment rather than voluntary redundancy or compulsory redundancy means. Therefore the Council is committed to maximising opportunities for school staff to secure employment in other schools in Cardiff and will facilitate a redeployment process.

Full support will be offered to the school staff and governing body of Meadowbank Special School by HR People Services throughout the reorganisation. This will involve attendance at consultation meetings, meetings with school staff where appropriate and the circulation of a Frequently Asked Questions document.

## **22. Land matters**

The future use of the Meadowbank Special School site would be considered should the proposal be progressed to implementation. It is expected that the site would be retained for educational purposes.

## **23. Learner travel arrangements**

Under these proposals there are no plans to change the Council's policy on the transport of children to and from schools. Any pupils affected by this proposal would be offered the same support with transport as is provided throughout Cardiff and in accordance with the same criteria that apply across Cardiff. The Council's transport policy can be viewed on the Council's website

([www.cardiff.gov.uk/ENG/resident/Schools-and-learning/Schools/School-transport/Pages/default.aspx](http://www.cardiff.gov.uk/ENG/resident/Schools-and-learning/Schools/School-transport/Pages/default.aspx)).

There is a statutory legal obligation on the Council to provide free home to school transport to Primary school pupils who live 2 miles or more from the nearest suitable school, as measured by the shortest available walking route.

When deciding which is the nearest suitable school, the local authority must consider any disability a child has and any special educational needs (SEN).

#### **24. Impact of the proposal on the Welsh language**

It is anticipated that the proposal would have a beneficial impact on Welsh language as it would address the need for Welsh medium SEN provision.

#### **25. Equality matters**

An initial Equality Impact Assessment has been carried out. The assessment concluded that this proposal would not adversely affect a particular group in society. The assessment will be reviewed following consultation.

#### **26. Sustainability matters**

A Strategic Environmental Assessment (SEA) of the proposal has been carried out in accordance with European Legislation. The assessment confirms that the proposal is compatible with the environmental objectives identified in the SEA of Cardiff's 21<sup>st</sup> Century: A Strategic Framework for a School Building Improvement Programme.

#### **27. Considering community impact**

There is a need to respond to a trend away from Special Schools for speech and language needs and to increase provision for Primary aged pupils presenting with challenging behaviours without impacting adversely on the community. The following are taken into account when considering a proposal: Public Open Space, parkland, noise and traffic congestion. Officers will work with schools and any community groups to ensure that should the proposal proceed it would avoid negative impacts wherever possible.

#### **28. What happens next?**

##### **Key dates**

The feedback from this consultation will be collated and summarised, and a report presented to the Council's Cabinet. This consultation report will be available for all persons to view on the Council website and copies can be obtained on request by using the contact details in this document.

There are a number of further stages that the Council would have to go through before a final decision is made by the Council.

## **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](http://www.cardiff.gov.uk/21stcenturyschools)
- Or if you prefer you can e-mail your views to: [schoolresponses@cardiff.gov.uk](mailto: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.

Your name:

.....

Address:

.....

Postcode:

.....

Date:

.....

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.

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.

<p>This document is about changes proposed to schools in your area. You have been sent this document for you to find out more about this proposal and for you to give your views. Please tick this box if you require this information in your language and write your name, address and telephone number in English or Welsh in the large box at the bottom of the form. Please return this form to the address at the top of the form.</p>	
FR	<input type="checkbox"/> <p>Ce document est sur les changements proposés dans les écoles de votre région. Vous avez été envoyé ce document pour que vous vous renseigniez d'avantage au sujet de la proposition et pour vous de donner votre opinion.          Veuillez cocher cette case si vous avez besoin de cette information dans votre langue et écrire votre nom, l'adresse et numéro de téléphone en Anglais ou en Welsh/Gallois dans la grande case au bas de ce formulaire. S'il vous plait, retourner ce formulaire à l'adresse indiquée au début de ce formulaire.</p>
CN	<input type="checkbox"/> <p>這份文件是關於您所在地區附近學校更改的提議。該文件已發送給您，讓您更加了解這些提議，並讓你提出你的意見。          如果您需要了解這些用你的母語翻譯的信息，請勾選此框。          在表格末的大框格里，用英語或威爾士語寫你的姓名，地址和電話號碼。並請將本表格寄回該表格頂部的地址。</p>
SM	<input type="checkbox"/> <p>Warqadani waxay ku saabsantahay aragtida is bedel la doonaayo in lagu sameeyo iskuulada xaafada.          Fadlan hadaad u baahantahay faahfaahin ku qoran afkaaga hooyo ,hoos calaamadee.          Magacaaga, adireeskaaga, iyo telefonkaagaba ku qor afka ingiriisiga , AMA welshka.          Dibna igu soo dir foomka , adireeska kor ku qoran</p>
PL	<input type="checkbox"/> <p>Dokument ten dotyczy proponowanych zmian w szkołach w Pańskiej okolicy. Wysłano go po to, by mogli się Państwo dowiedzieć więcej na temat projektu oraz wyrazić swoją opinię.          Proszę zaznaczyć to okienko, jeżeli potrzebują Państwo owych informacji w języku ojczystym oraz proszę podać imię, nazwisko, adres i numer telefonu po angielsku lub walijsku w dużym okienku na dole formularza. Proszę zwrócić formularz na adres <b>podany na górze</b>.</p>
CZ	<input type="checkbox"/> <p>Tento dokument se týká změn, které byly navrženy školám ve vašem okrsku.          Dokument vám byl zaslán, abyste se dozvěděli více o tomto návrhu a abyste měli možnost vyjádřit své názory.          Prosim zaškrtněte toto políčko, pokud potřebujete tuto informaci ve vašem jazyce a napište svoje jméno, adresu a telefonní číslo v anglickém nebo velšském jazyce do velkého políčka, které je v dolní části tohoto formuláře. Prosim zašlete tento formulář zpět na adresu, která je poskytnuta v horní části tohoto formuláře.</p>
AR	<input type="checkbox"/> <p>هذه الوثيقة بخصوص بعض التغييرات المقترحة على المدارس في منطقتك . ولقد أرسلنا هذه الوثيقة إليك لكي تعلم وتتعرف على هذه المقترحات ثم تبدي رأيك فيها.          من فضلك ضع علامة على هذا المربع إذا كنت تحتاج معرفة هذه المعلومات مترجمة إلى لغتك الأصلية ، ثم اكتب أسمك ، و عنوانك ، و رقم هاتفك باللغة الإنجليزية أو لغة الويلش في المربع الكبير الموجود بأسفل هذه الورقة .          من فضلك أرسل هذه الورقة إلى العنوان الموجود في أعلى هذه الورقة.</p>
HD	<input type="checkbox"/> <p>यह दस्तावीज़ आपके क्षेत्र में स्कूलों के लिए प्रस्तावित परिवर्तनों के बारे में हैं। आपको यह दस्ताविज़ इस प्रस्ताव के बारे में और अधिक जानकारी देने के लिए और इसके बारे में आप आपने विचार देने के लिए भेजा गया हैं।          अगर आपको आपनी भाषा में इस जानकारी की अवश्यता हैं तो कृपया इस बॉक्स में टिक करे, और फॉर्म के ताल पर बड़े बॉक्स में अंग्रेजी या वेल्श में अपना नाम, पता और टेलिफोने नंबर लिखे। कृपया इस फार्म को उपर दिए गए पते पर वापस भेजे।</p>



Please return this form to **Room 213, County Hall, Atlantic Wharf, Cardiff CF10 4UW** by  
**29 FEBRUARY 2016**

DR	<input type="checkbox"/>	این اطلاعات راجب عوض شدن برنامه در مکتبہا در این منطقه است. این اطلاعات برای شما روان شدہ است کہ شما بیشتر راجب این موضع بفہمید و نظر خود را بگویید. این چارخانہ را علامت بزنید اگر می خواهید این اطلاعات در زبان خودتان باشد. اسم و ادرس و تلفن نمبر خود را در انگلیسی یا در ولسی در داخل چار خانہ کلن کہ در پایان این فورم است نوشتہ کنید. خواہش بس این فورم را در آدرس کہ در بالا فورم نوشتہ است روان کنید.
GJ	<input type="checkbox"/>	આ દસ્તાવેજ તમારાં વિસ્તારની શાળાઓના દરખાસ્ત થયેલ ફેરફારો બારામાં છે. આ દસ્તાવેજ તમને દરખાસ્ત બાબત વધુ માહિતી મેળવવાં ને તમારાં અભિપ્રાયો આપવા માટે મોકલાયેલ છે. મહેરબાની કરી આ માહિતી તમને તમારી ભાષામાં જોઈએ તો આ ખાનું ભરી દર્શાવો ને તમારું નામ, સરનામું ને ટેલીફોન નંબર અંગ્રેજી કે વેલ્શમાં પત્રકના છેવાડે મોટાં ખાનામાં લખો. મહેરબાની કરી આ પત્રક મથાળે આપેલ સરનામે પરત કરશો.
KD	<input type="checkbox"/>	نه م نامہ یہ دہ ربارہ ی نہ و گورانکار پانہ یہ کہ پیشنیار کراون بو فوتابخانہ کانی ناو چہ کہ ت نہ م نامہ یہ ت بو دہ نیرین بو نہ وہ ی ناگداری نہ و پیشنیار انہ ت بکہ ین و بو چونی خوتمان بو روون بکہ پتہ و ہ . تکایہ نہ و چوار گوشہ ب چوکہ دہ ستیشان بکہ نہ گہ ر دہ تہ ویت کویبہ کہ لہ م زانیارنہ بہ زمانی خوت بو بنیرین. ناوی خوت و نہ درہ سہ کہ ت و زمارہ ی تہ لہ فونہ کہ ت بہ ننگلیزی یان بہ ویلزی لہ و چوار گوشہ گہ ورہ یہ ی خوارہ وہ ی نہ م لا پہ رہ یہ بنوسہ . تکلیہ نہ م لا پہ رہ بنیرہ بو نہ و نہ درہ سہ ی لہ سہ روی نہ م لا پہ رہ نوسراوہ
PJ	<input type="checkbox"/>	ਇਹ ਦਸਤਾਵੇਜ਼ ਆਪ ਜੀ ਦੇ ਇਲਾਕੇ ਦੇ ਸਕੂਲਾਂ ਵਿੱਚ ਆਉਣ ਵਾਲੇ ਪ੍ਰਸਤਾਵ ਉਪਰ ਹੈ। ਇਹ ਦਸਤਾਵੇਜ਼ ਆਪ ਦੀ ਇਨ੍ਹਾਂ ਪ੍ਰਸਤਾਵਾਂ ਉਪਰ ਹੋਰ ਜਾਣਕਾਰੀ ਵਧਾਉਣ ਅਤੇ ਆਪ ਦੇ ਸੁਝਾਵ ਲੈਣ ਲਈ ਭੇਜਿਆ ਗਿਆ ਹੈ। ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਅਪਣੀ ਭਾਸ਼ਾ ਵਿੱਚ ਚਾਹਿਦੀ ਹੈ ਤਾਂ ਇਸ ਖਾਨੇ ਵਿੱਚ ਟਿੱਕ ਕਰੋ ਅਤੇ ਅਪਣਾਂ ਨਾਂ, ਪਤਾ ਅਤੇ ਟੈਲੀਫੋਨ ਨੰਬਰ ਇੰਗਲਿਸ਼ ਜਾਂ ਵੈਲਸ਼ ਵਿੱਚ ਫਾਰਮ ਦੇ ਨਿੱਚੇ ਬੱਠੇ ਵੱਖ ਖਾਨੇ ਵਿੱਚ ਲਿਖੋ। ਕਿਰਪਾ ਕਰਕੇ ਇਹ ਫਾਰਮ ਉਪਰ ਦਿੱਤੇ ਪਤੇ ਤੇ ਵਾਪਸ ਕਰੋ।
UD	<input type="checkbox"/>	یہ دستاویز آپ کے علاقے میں سکولوں کی تجویز تہدیلیوں کے بارہ میں ہے۔ آپ کو یہ دستاویز اس لیے لیے بھیجی جارہی ہے تاکہ آپ اس تجویز کے بارہ میں مزید جان سکیں اور اپنی رائے سے آگاہ کریں۔ اگر آپ کو یہ معلومات اپنی زبان میں چاہیے تو برائے مہربانی اس خانے میں نشان لگادیں اور اپنا نام، پتہ اور فون نمبر انگریزی یا ویلش زبان میں اس فارم میں چھپدے گئے بڑے خانے میں لکھ دیں۔ مہربانی فرما کر یہ فارم اوپر دیے گئے پتہ پر واپس بھیجوادیں۔
BG	<input type="checkbox"/>	ইহা আপনার এলাকার স্কুলগুলিতে পরিবর্তন সম্বন্ধে প্রস্তাবিত একটি ডকিউমেন্ট। এই ডকিউমেন্টটি আপনাকে পাঠানো হয়েছে আপনার অবগতি এবং আপনার মতামত জানার জন্য। যদি এই তথ্যটি আপনার ভাষায় পেতে চান তবে দয়াকরে এই বাজেট টিক দিন এবং আপনার নাম, ঠিকানা ও টেলিফোন নাম্বার ওয়েলশ অথবা ইংরেজীতে এই ফর্মের নিচের বড় বাজের মধ্যে লিখুন। দয়াকরে ফর্মের উপরে লিখিত ঠিকানায় এই ফর্মটি ফেরৎ পাঠিয়ে দিন।

✉	Name:
	Address:
☎	Phone:

## **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**

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**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

15<sup>th</sup> March 2016

Dear Sir/Madam,

**Re: Meadowbank Special School**

On 7<sup>th</sup> 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 21<sup>st</sup> 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 21<sup>st</sup> 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](http://www.cardiff.gov.uk/21stcenturyschools)
- Or if you prefer you can e-mail your views to: [schoolresponses@cardiff.gov.uk](mailto: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

Roath Park Primary School  
Pen-y-Wain Road  
Roath Park  
Cardiff  
CF24 4BB

Telephone 029 20499549

Fax 029 20485762

E-mail [roathparkprm@cardiff.gov.uk](mailto:roathparkprm@cardiff.gov.uk)

Headteacher C J Skinner (B.ED HONS)

29<sup>th</sup> 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

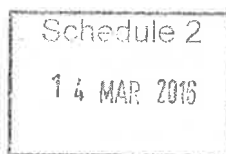
Address: Meadowbank School

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.



GIG  
CYMRU  
NHS  
WALES

Bwrdd Iechyd Prifysgol  
Caerdydd a'r Fro  
Cardiff and Vale  
University Health Board

## Children's Speech & Language Therapy Therapi Iath a Lleferydd Plant

Riverside Health Centre  
Wellington Street  
Canton  
Cardiff  
CF11 9SH  
Phone 029 2090 7645

Canolfan Iechyd Glanrafon  
Stryd Wellington  
Treganna  
Caerdydd  
CF11 9SH  
Ffôn 029 2090 7645

Date: 1<sup>st</sup> 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 21<sup>st</sup> 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.<sup>1</sup> 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.

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<sup>1</sup> 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 excellence in practice and influence health, education, care and justice policies.

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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 proportion of specialist services, placed within a government.

We are aware that a great deal of work is being undertaken to ensure that children with special needs are included in mainstream settings. We believe that this work is essential to ensure that all children have access to the services they need. We would like to see a focus on ensuring that children with special needs are included in mainstream settings, wherever possible. We would like to see a focus on ensuring that children with special needs are included in mainstream settings, wherever possible.

# Afasic CYMRU

voice for life  
llais ar gyfer bywyd

Charity No. 1045617

**Cardiff Council 21<sup>st</sup> 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**

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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 21<sup>st</sup> 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>



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**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.'*





Comisiynydd y  
Gymraeg  
Welsh Language  
Commissioner

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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Welsh Language  
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**

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**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.

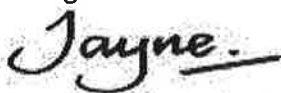
As a former teacher and current chairman of a special school, I know the importance of specialist provision.

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**

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**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.

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**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](mailto:schoolresponses@cardiff.gov.uk)

Ref: 137030/CW/Education

Date: 14<sup>th</sup> 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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Cynulliad Cenedlaethol Cymru  
38 Y Parêd, Y Rhath,  
Caerdydd, CF24 3AD  
[Eluned.Parrott@cymru.gov.uk](mailto:Eluned.Parrott@cymru.gov.uk)  
[www.ElunedParrott.com](http://www.ElunedParrott.com)  
T +44 (0)29 2046 2326

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National Assembly for Wales  
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**Eluned Parrott**

Aelod Cynulliad dros  
Ganol De Cymru

Assembly Member for  
South Wales Central



Cynulliad National  
Cenedlaethol Assembly for  
Cymru Wales

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**

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**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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Wales**

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**We welcome correspondence in Welsh or English**

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*"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 21<sup>st</sup> 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**

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**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 16<sup>th</sup> 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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## Appendix 3



### Cardiff Council Statutory Screening Tool Guidance

If you are developing a strategy, policy or activity that is likely to impact people, communities or land use in any way then there are a number of statutory requirements that apply. Failure to comply with these requirements, or demonstrate due regard, can expose the Council to legal challenge or other forms of reproach.

For instance, this will apply to strategies (i.e. Housing Strategy or Disabled Play Strategy), policies (i.e. Procurement Policy) or activity (i.e. developing new play area).

Completing the Statutory Screening Tool will ensure that all Cardiff Council strategies, policies and activities comply with relevant statutory obligations and responsibilities. Where a more detailed consideration of an issue is required, the Screening Tool will identify if there is a need for a full impact assessment, as relevant.

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The main statutory requirements that strategies, policies or activities must reflect include:

- **Equality Act 2010 - Equality Impact Assessment**
- **Welsh Government's Sustainable Development Bill**
- **Welsh Government's Statutory Guidance - Shared Purpose Shared Delivery**
- **United Nations Convention on the Rights of the Child**
- **United Nations Principles for Older Persons**
- **Welsh Language Measure 2011**
- **Health Impact Assessment**
- **Habitats Regulations Assessment**
- **Strategic Environmental Assessment**

This Statutory Screening Tool allows us to meet all the requirements of all these pieces of legislation as part of an integrated screening method that usually taken no longer than an hour.

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The Screening Tool can be completed as a self assessment or as part of a facilitated session, should further support be needed. For further information or if you require a facilitated session please contact the Policy, Partnerships and Citizen Focus Team on 2078 8563 e-mail: [siadavies@cardiff.gov.uk](mailto:siadavies@cardiff.gov.uk). Please note:

- **The completed Screening Tool must be submitted as an appendix with the Cabinet report.**
- **The completed screening tool will be published on the intranet.**

## Statutory Screening Tool

<b>Name of Strategy / Policy / Activity:</b>  School Organisation Proposals: Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.	<b>Date of Screening:</b>  June 2016
<b>Service Area/Section:</b> Education	<b>Lead Officer:</b> Nick Batchelar
<b>Attendees:</b> Self-assessment	

<b>What are the objectives of the Policy/Strategy/Project/Procedure/ Service/Function</b>	<b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>
<p>The Cabinet is recommended to authorise the Director of Education and Lifelong Learning, in consultation with the Cabinet Member for Education, to;</p> <ol style="list-style-type: none"> <li>1. Carry out a further review of speech and language support in Cardiff with the aim of bringing forward revised proposals;</li> <li>2. Undertake further engagement with schools and other stakeholders in relation to early intervention for children with behavioural emotional and social needs;</li> <li>3. Work with the governing bodies of Meadowbank and Allensbank Schools to ensure the needs of children with speech and language needs placed at the schools can continue to be met effectively, pending a revised proposal.</li> </ol>	<p><u>Background</u>          At its meeting on 03 December 2015 the Cabinet authorised officers to undertake a public consultation on proposals to:</p> <ul style="list-style-type: none"> <li>• Close Meadowbank Special School at the end of the academic year 2017.</li> <li>• Continue to maintain a Specialist Resource Base (SRB) at Allensbank School but cease admission of pupils with speech and language difficulties, unless transferring from Meadowbank Special School. Redesignate this as an SRB for pupils with autism spectrum conditions (ASC), with first admission of ASC children in September 2018.</li> <li>• Continue to maintain a Specialist Resource Base at Fairwater School but cease admission of pupils with statements for behaviour emotional and social difficulties. Redesignate this as an Early Intervention Class (EIC) from September 2018.</li> <li>• Maintain the specialist classes at Glan Yr Afon (Revolving Door) and Springwood (Nurture Class), but rebadge these as Early Intervention Classes, adopting</li> </ul>

the proposed admission criteria and operational procedures outlined above from September 2018.

The initial proposal set out a significant reshaping of specialist provision to respond to the changing pattern of special educational needs and the increased capacity of mainstream schools to support special educational needs.

The proposed reshaping would maintain the current level of investment in specialist provision and support for special educational needs, while ensuring a better fit to the current pattern of need.

There has been an ongoing gradual decline in the number of parents who request a specialist speech and language placement for their child, which has resulted in a steady fall in the number of funded places over many years, from 70 places prior to 2006; to 58 places in 2010, and to 34 places in November 2015.

The Council has responded to this shift in expectation by investing in mainstream support over several years. Work to build capacity for speech and language support began in 2010 and remains ongoing. The Council believes the fall in demand/ need for specialist places is a direct result both of parental expectations for mainstream inclusion and the capacity building work that has been done to meet needs more effectively in mainstream.

Alongside the changes affecting speech and language provision, there has been an increased demand for specialist provision for children with special educational needs such as autism spectrum conditions and behavioural emotional and social needs.

ESTYN recognised the rationale for responding to these pressures by re-shaping provision by closing Meadowbank School, redesignating the SRB at Allensbank for ASC and developing a network of Early Intervention Classes.

The consultation response

In relation to support for speech and language needs, many respondents acknowledged the effectiveness of the work that has been undertaken in recent years to build capacity and skills in mainstream schools. This work has included a comprehensive training programme; universal early screening for speech and

language needs; and a collaborative working relationship between Cardiff and the Vale UHB Speech and Language Therapy Service and the Specialist Teacher Service.

There is also a general acknowledgment among respondents, of the need for some change in the pattern of provision to support speech and language needs.

However, there is a strong consensus among stakeholders regarding the importance of continuing to maintain an effective range of specialist support for children with speech language and communication needs, and concerns that the proposal does not yet fully address this issue.

In particular, strong views have been expressed regarding the need to retain some designated specialist provision for children with the most severe speech and language needs.

Some respondents express the view that special school places should continue to form part of the range of specialist provision. Other respondents put more emphasis on the need for early intervention in the form of resource bases.

Given the strong views expressed by stakeholders it is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.

In developing a revised proposal, the relative benefits and costs of SRB and special school provision will need to be borne in mind. In Council's view, SRBs are a more efficient and effective means of delivering short-term or part-time support. The cost of an SRB place is between one third and one half the cost of a special school place, while the mainstream location of SRBs offers additional benefits for children of ongoing contact with mainstream peers and learning experiences.

In relation to support for behavioural emotional and social needs, many respondents acknowledged the growing demand for specialist provision for children presenting with behavioural emotional and social needs, and recognised that there are insufficient specialist places available to meet this need at present.

The Council agrees with this analysis and this factor was key reason for the proposal

	<p>outlined.</p> <p>However, there is not yet consensus or sufficient clarity about the criteria and purpose of Early Intervention Classes. Further work is therefore needed to clarify and develop this aspect of the proposal prior to bringing forward a revised proposal for consideration.</p> <p>The initial proposal to develop a network of Early Intervention Classes was based on a reinvestment of the resources and skills that would be released by closure of Meadowbank School. In the absence of significant new investment, it would not be possible to proceed with these classes while also retaining Meadowbank School.</p> <p><u>Reason for recommendation</u></p> <p>The consultation has identified a number of views that are significant concerns for stakeholders. It is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.</p>
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### Part 1: Impact on outcomes and due regard to Sustainable Development

Please use the following scale when considering what contribution the activity makes:		
<b>+</b>	Positive	Positive contribution to the outcome
<b>-</b>	Negative	Negative contribution to the outcome
<b>ntrl</b>	Neutral	Neutral contribution to the outcome
<b>Uncertain</b>	Not Sure	Uncertain if any contribution is made to the outcome

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.1	<p><b>People in Cardiff are healthy;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</i></li> <li><i>vulnerable citizens and areas of multiple deprivation</i></li> <li><i>Addressing instances of inequality in health</i></li> </ul>		✓			<ul style="list-style-type: none"> <li>The delay in a decision regarding the future of provision for speech and language needs will cause a delay in the goal of providing additional specialist places for children experiencing behaviour emotional and social difficulties.</li> <li>The number of primary aged pupils who require a specialist placement due to their behaviour emotional social needs is</li> </ul>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
						<p>increasing. There are insufficient specialist places to meet this need.</p> <ul style="list-style-type: none"> <li>- There is a high risk that in September 2016 there will be 12 or more pupils unable to access the specialist provision they need, and their needs will be insufficiently met.</li> </ul>
<b>1.2</b>	<p><b>People in Cardiff have a clean, attractive and sustainable environment;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>the causes and consequences of Climate Change and creating a carbon lite city</i></li> </ul>			✓		<ul style="list-style-type: none"> <li>- The recommendation to develop revised proposals will have no impact on this outcome.</li> </ul>
	<ul style="list-style-type: none"> <li>• <i>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</i></li> </ul>			✓		<ul style="list-style-type: none"> <li>- The recommendation to develop revised proposals will have no impact on this outcome.</li> </ul>
	<ul style="list-style-type: none"> <li>• <i>reducing environmental pollution (land, air, noise and water)</i></li> </ul>					N/A
	<ul style="list-style-type: none"> <li>• <i>reducing consumption and encouraging waste reduction, reuse, recycling and recovery</i></li> </ul>					N/A
	<ul style="list-style-type: none"> <li>• <i>encouraging biodiversity</i></li> </ul>					N/A

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.3	<p><b>People in Cardiff are safe and feel safe;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>reducing crime, fear of crime and increasing safety of individuals</i></li> <li>• <i>addressing anti-social behaviour</i></li> <li>• <i>protecting vulnerable adults and children in Cardiff from harm or abuse</i></li> </ul>		✓			- high quality support for speech and language pupils in mainstream schools, and in specialist settings will continue pending revised proposals. However, there will be a delay in securing additional provision for pupils with behavioural emotional and social difficulties with the outcome that some vulnerable learners and their families will be adversely affected.
1.4	<p><b>Cardiff has a thriving and prosperous economy;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</i></li> <li>• <i>Assisting those Not in Education, Employment or Training</i></li> <li>• <i>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</i></li> <li>• <i>promoting local procurement opportunities or enhancing the capacity of local companies to compete</i></li> </ul>					N/A.
1.5	<p><b>People in Cardiff achieve their full potential;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>promoting and improving access to life-long learning in Cardiff</i></li> <li>• <i>raising levels of skills and qualifications</i></li> <li>• <i>giving children the best start</i></li> <li>• <i>improving the understanding of sustainability</i></li> <li>• <i>addressing child poverty (financial poverty, access poverty, participation poverty)</i></li> <li>• <i>the United Nations Convention on the Rights of a Child and Principles for Older persons</i></li> </ul>		✓			- high quality support for speech and language pupils in mainstream schools, and in specialist settings will continue pending revised proposals. However, there will be a delay in securing additional provision for pupils with behavioural emotional and social difficulties with the outcome that some vulnerable learners and their families will be adversely affected.



	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.6	<p><b>Cardiff is a Great Place to Live, Work and Play</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>promoting the cultural diversity of Cardiff</i></li> <li>• <i>encouraging participation and access for all to physical activity, leisure &amp; culture</i></li> <li>• <i>play opportunities for Children and Young People</i></li> <li>• <i>protecting and enhancing the landscape and historic heritage of Cardiff</i></li> <li>• <i>promoting the City's international links</i></li> </ul>					N/A
1.7	<p><b>Cardiff is a fair, just and inclusive society.</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>the elimination of discrimination, harassment or victimisation for equality groups</i></li> <li>• <i>has the community or stakeholders been engaged in developing the strategy/policy/activity?</i></li> <li>• <i>how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</i></li> </ul>	✓				<p>See Equality Impact Assessment below (and attached).</p> <ul style="list-style-type: none"> <li>- The education community, families and other partners have been engaged in consultation on the initial proposal. The recommendation to develop revised proposals is a recognition of the concerns that have been expressed and the need to reconsider some elements of the proposal.</li> </ul>
1.8	<p><b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>strengthening partnerships with business and voluntary sectors</i></li> <li>• <i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>	✓				<ul style="list-style-type: none"> <li>- In the process of developing revised proposals, there will be further engagement with stakeholders, including schools, pupils, families, NHS health services and voluntary sector partners, with a view to further developing collaborative approaches to supporting children with special educational needs and their families.</li> </ul>

Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
	+	-	Ntrl	Un-Crtn	
Will this Policy/Strategy/Project have a <b>differential impact</b> on any of the following:					<i>Please give details/consequences of the differential impact (positive and negative), and what action(s) can you take to address any negative implications?</i>
<ul style="list-style-type: none"> <li><b>Age</b> (including children and young people aged 0-25 and older people over 65 in line with the United Nations Conventions)</li> </ul>		✓			<b>Age 4 – 11</b> <ul style="list-style-type: none"> <li>- There is insufficient provision for pupils with behaviour emotional and social needs in this age group.</li> <li>- Projections of need suggest that an additional SRB for pupils with autism spectrum conditions will be needed by September 2017.</li> <li>- The delay in making a decision regarding the reshaping of specialist provision for primary aged pupils will have an adverse impact on the above groups.</li> </ul>
<ul style="list-style-type: none"> <li><b>Disability</b></li> </ul>		✓			<ul style="list-style-type: none"> <li>- high quality support for speech and language pupils in mainstream schools, and in specialist settings will continue pending revised proposals. However, there will be a delay in securing additional provision for pupils with behavioural emotional and social difficulties with the outcome that some vulnerable learners and their families will be adversely affected.</li> </ul>
<ul style="list-style-type: none"> <li><b>Gender Reassignment</b></li> </ul>			✓		N/A
<ul style="list-style-type: none"> <li><b>Marriage &amp; Civil Partnership</b></li> </ul>			✓		N/A
<ul style="list-style-type: none"> <li><b>Pregnancy &amp; Maternity</b></li> </ul>			✓		N/A
<ul style="list-style-type: none"> <li><b>Race</b></li> </ul>			✓		The proposal would not have a differential impact upon one particular ethnic group as the provision would be available to all.
<ul style="list-style-type: none"> <li><b>Religion/Belief</b></li> </ul>			✓		N/A
<ul style="list-style-type: none"> <li><b>Sex</b></li> </ul>			✓		All schools would continue to admit pupils of both sexes.

Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
	+	-	Ntrl	Un-Crtn	
					The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing the changes in this proposal. This ensures that good practice is followed, including the application of the Council's policies on equal opportunities.
<ul style="list-style-type: none"> <li>• Sexual Orientation</li> </ul>			✓		N/A
<ul style="list-style-type: none"> <li>• Welsh Language</li> <li>• Other languages</li> </ul>	✓				<p>The decision to revisit the proposals could delay provision of Welsh-medium specific provision for behavioural social and emotional difficulties.</p> <p><u>Other Language support</u></p> <p>The proposal will not directly impact on the level of support provided as all support is dependent on the Minority Ethnic Achievement Grant which is reviewed and then renewed according to the results of the annual Needs Assessment Survey. The allocation of teachers and Bi-lingual Teacher Assistants (BTAs) is usually in place for the period of the academic year but is liable to change throughout the year to meet fluctuations in demand.</p>

**SUMMARY OF APPRAISAL (highlight positive and negative effects of the policy / plan / project being assessed, demonstrating how it contributes to the economic, social and environmental sustainability of the city):**

**Economic/Educational/Social**

The decision not to progress the initial proposal will initially have a potentially adverse effect on the education of a small group of vulnerable learners with behavioural social emotional needs, for whom there is currently insufficient provision. The initial proposal attempted to address this by releasing resources from under-subscribed speech and language provision, and investing in additional specialist places for this group.

The decision to undertake further work and revise the proposals will ultimately result in proposals that address the concerns of stakeholders.

**WHAT ACTIONS HAVE BEEN IDENTIFIED OR CHANGES BEEN MADE TO THE POLICY / PLAN / PROJECT AS A RESULT OF THIS APPRAISAL:**

The following assessments to be undertaken:

- Equality Impact Assessment to be updated once revised proposals have been developed

## Part 2: Strategic Environmental Assessment Screening

		Yes	No
2.1	Does the plan or programme set the framework for future development consent?		X
2.2	Is the plan or programme likely to have significant, positive or negative, environmental effects?		X

Is a Full Strategic Environmental Assessment Screening Needed?	Yes	No
<ul style="list-style-type: none"> <li>▪ If yes has been ticked to both questions 2.1 and 2.2 then the answer is yes</li> <li>▪ If a full SEA Screening is required then please contact the Sustainable Development Unit to arrange (details below)</li> </ul>		X An SEA has been undertaken (see attached) and will be updated following public consultation on the school proposals.

If you have any doubt on your answers to the above questions regarding SEA then please consult with the Sustainable Development Unit on 2087 3228 [sustainabledevelopment@cardiff.gov.uk](mailto:sustainabledevelopment@cardiff.gov.uk)

## Part 3: Habitat Regulation Assessment (HRA)

		Yes	No	Unsure
3.1	Will the plan, project or programme results in an activity which is known to affect a European site, such as the Severn Estuary or the Cardiff Beech Woods?		X	
3.2	Will the plan, project or programme which steers development towards an area that includes a European site, such as the Severn Estuary or the Cardiff Beech Woods or may indirectly affect a European site?		X	
3.3	Is a full HRA needed?		X	

Details of the strategy will be sent to the County Ecologist on completion of the process to determine if a Habitat Regulation Assessment is needed. For further information please phone 2087 3215 or email [biodiversity@cardiff.gov.uk](mailto:biodiversity@cardiff.gov.uk)

## Appendix 1 – Statutory Requirements

It is possible that the Impact Screening Tool will identify the need to undertake specific statutory assessments:

- **Equality Impact Assessment:** *This assessment is required by the Equality Act 2010 and Welsh Government's Equality Regulations 2011.*
- **Sustainable Development Bill:** *The Bill, when it comes into effect, will require sustainable development (SD) to be a central organising principle for the organisation. This means that there is a duty to consider SD in the strategic decision making processes.*
- **Shared Purpose Shared Delivery-** *The Welsh Government requires local authorities to produce a single integrated plan to meet statutory requirements under a range of legislation. Cardiff Council must therefore demonstrate its contribution towards Cardiff's own integrated plan; "What Matters".*
- **United Nations Convention on the Rights of the Child:** *The Children Act 2004 guidance for Wales requires local authorities and their partners to have regard to the United Nations Convention on the Rights of a Child.*
- **United Nations Principles for Older Persons:** *The principles require a consideration of independence, participation, care, self-fulfillment and dignity.*
- **The Welsh Language Measure 2011:** *The measure sets out official status for the Welsh language, a Welsh language Commissioner, and the freedom to speak Welsh.*
- **Health Impact Assessment:** *(HIA) considers policies, programmes or projects for their potential effects on the health of a population*
- **Strategic Environmental Impact Assessment:** *A Strategic Environmental Assessment (SEA) is an European Directive for plans, programmes and policies with land use implications and significant environmental effects.*
- **Habitats Regulations Assessment:** *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 provides a requirement to undertake Habitats Regulations Assessment (HRA) of land use plans.*

Initial Equality Impact Assessment  
**Corporate Assessment Template**



<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b>	
School Organisation Proposals: Specialist provision for primary aged pupils with speech and language difficulties and with behavioural emotional and social difficulties	
<b>New/Existing/Updating/Amending:</b>	
New	
<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Jennie Hughes	Job Title: Senior Achievement Leader Inclusion
Service Team: Inclusion	Service Area: Education
Assessment Date: December 2014	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

**It is proposed that:**

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

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

**2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

There has been a trend away from special schools places for speech and language needs as part of a national trend towards inclusion. Cardiff is the only local authority in England and Wales still maintaining a special school specialising solely in speech and language needs.

While special school continues to be an important option for some children with complex, long term learning difficulties, there has been a general trend for children with moderate learning delays, speech and language difficulties and physical disabilities to attend a local school.

Meadowbank School is a small special school located in Gabalfa adjacent to Gabalfa Primary School and Ysgol Glan Ceubal, for children aged 4-11 with significant speech and language difficulties.

Historically the Vale of Glamorgan Council funded 10 places at the school and at that time the school operated at 40 places. In 2010, the Vale of Glamorgan gave notice of their intention to withdraw from this arrangement, making no new placements. In July 2015 the last Vale child left the school.

Cardiff also maintains a specialist resource base (SRB) at Allensbank Primary School, for 20 pupils with speech and language difficulties.

Although the number of children and young people with speech and language difficulties has not fallen, demand for places at both Meadowbank and Allensbank SRB has fallen in recent years, with an increasing number of parents expressing a preference for mainstream education, with support provided in the local catchment school.

At the present time, November 2015, there are 23 pupils on roll at Meadowbank.

Demand for places at Allensbank has also fallen from 18 in 2010-11, to 11 pupils in November 2015.

The prospects for pupils with speech and language difficulties to be reintegrated to mainstream school are good; the majority of pupils attending Meadowbank and Allensbank SRB transfer to a local high school at Year 7, and many pupils make sufficient progress to transfer at an earlier age.

A report on specialist provision for pupils with SEN/ ALN was completed in 2013. This identified a number of priorities for future development of special school and SRB provision.

In March 2014 a focus group of Headteachers, health, children services and parent partnership representatives was consulted on the priorities for future development of BESD provision in Cardiff (Appendix 3). There was consensus on the need for:

- More capacity for early intervention such as Nurture Classes and Revolving door classes;
- Greater emphasis on the underlying needs experienced by this group including: mental health and medical needs; speech and language difficulties; literacy and numeracy delays.

Demand for special school or SRB places for primary aged children presenting with challenging behaviours has increased over the last two years. In 2014-15 there was a 30% increase in the number of new statements for this area of need..

The initial proposal set out a significant reshaping of specialist provision to respond to the changing pattern of special educational needs described above. The proposed reshaping would maintain the current level of investment in specialist provision and support for special educational needs, while ensuring a better fit to the current pattern of need.

There is also a general acknowledgment among respondents, of the need for some change in the pattern of provision to support speech and language needs.

However, there is a strong consensus among stakeholders regarding the importance of continuing to maintain an effective range of specialist support for children with speech language and communication needs, and concerns that the proposal does not yet fully address this issue. In particular, strong views have been expressed regarding the need to retain some designated specialist provision for children with the most severe speech and language needs.

Given the strong views expressed by stakeholders it is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.

In relation to support for behavioural emotional and social needs, many respondents acknowledged the growing demand for specialist provision for children presenting with behavioural emotional and social needs, and recognised that there are insufficient specialist places available to meet this need at present. The Council agrees with this analysis and this factor was key reason for the proposal outlined.



However, there is not yet consensus or sufficient clarity about the criteria and purpose of Early Intervention Classes. Further work is therefore needed to clarify and develop this aspect of the proposal prior to bringing forward a revised proposal for consideration.

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

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
3-11 years	+ve /-ve		
12 - 65 years	x		
Over 65 years	x		

#### Please give details/consequences of the differential impact, and provide supporting evidence, if any.

High quality support for speech and language pupils in mainstream schools, and in specialist settings will continue pending revised proposals.

However, there will be a delay in securing additional provision for pupils with behavioural emotional and social difficulties with the risk that some vulnerable learners and their families will be adversely affected. It is anticipated that some pupils who require specialist placement will be unable to access this support and will remain in their local mainstream school with funded support. This will increase the risk of exclusion, school placement breakdown and adverse impact on other pupils.

#### What action(s) can you take to address the differential impact?

The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.

#### If no differential impact, explain the reason(s) for this assessment:

#### 3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment			X
Physical Impairment			X
Visual Impairment			X
Learning Disability			x
Long-Standing Illness or Health Condition			X
Mental Health	-ve		
Substance Misuse			X
Other			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The rise in the number of children displaying challenging behaviour correlates with the increase in mental health issues in very young children, which has been identified as national phenomenon.  
The delay in securing additional specialist provision for this vulnerable group, increases risks for children experiencing mental health difficulties.

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

N/A

**3.4. Marriage and Civil Partnership**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

N/A

**3.5 Pregnancy and Maternity**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy		X	
Maternity			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

<b>If no differential impact, explain the reason(s) for this assessment:</b>
N/A

### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		X	
Mixed / Multiple Ethnic Groups		X	
Asian / Asian British		X	
Black / African / Caribbean / Black British		X	
Other Ethnic Groups		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
N/A

### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		X	
Christian		X	
Hindu		X	
Humanist		X	
Jewish		X	
Muslim		X	
Sikh		X	
Other		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
N/A

### 3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men		X	
Women		X	

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>

**If no differential impact, explain the reason(s) for this assessment:**

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		X	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

**What action(s) can you take to address the differential impact?**

**If no differential impact, explain the reason(s) for this assessment:**

### 3.10 Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Language?

	Yes	No	N/A
Welsh Language	-ve		
Other languages		x	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The initial proposal made provision for a welsh medium specialist class for children experiencing behaviour emotional and social needs. Development of this specialist class may be delayed due to undertake further work and develop revised proposals.

**What action(s) can you take to address the differential impact?**

The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.

**If no differential impact, explain the reason(s) for this assessment:**

The proposal will not directly impact on the level of support provided as all support is dependent on the Minority Ethnic Achievement Grant which is reviewed and then renewed according to the results of the annual Needs Assessment Survey. The allocation of teachers and Bi-lingual Teacher Assistants (BTAs) is usually in place for the period of the academic year but is liable to change throughout the year to meet fluctuations in demand

## 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

- Revision of the proposals will include engagement with all stakeholders, including schools, pupils and their families, health, social care and voluntary sector organisations.

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.
Disability	The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.
Gender Reassignment	None identified
Marriage & Civil Partnership	None identified
Pregnancy & Maternity	None identified
Race	None identified
Religion/Belief	None identified
Sex	None identified
Sexual Orientation	None identified
Language	The Education and Lifelong Learning Directorate, via the behaviour support team, education psychology service and inclusion managers, will work closely with schools to ensure continued support for vulnerable pupils.
Generic Over-Arching	None identified .

**6. Further Action**

Once revised proposals have been developed, a new EIA and SA/SEA appraisal will be undertaken.

**7. Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By:	Date:
Designation:	
Approved By:	
Designation:	
Service Area: Education	

## **Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the proposal relating to Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties and with Behavioural Emotional and Social Difficulties.**

### **Background**

In 2008, a retrospective Strategic Environmental Assessment (SEA) of Cardiff's 21st Century: A Strategic Framework for a School Building Improvement Programme (published in 2006) was carried out based on the guidance that supports the European SEA Directive 2001/42/EC.

The retrospective approach to assessment was quality assured by an external consultant and their independent compliance review determined that the report detailing the assessment on the strategic framework met the key requirements set out for reporting the SEA process as required by the SEA Directive.

The assessment provides the basis for assessing current and future school organisation proposals at a strategic level.

**To request a copy of the assessment on the Strategic Framework please contact Clive Bailey, 029 2087 3166, [CBailey@cardiff.gov.uk](mailto:CBailey@cardiff.gov.uk) .**

### **Proposal**

At its meeting on 03 December 2015 the Cabinet authorised officers to undertake a public consultation on proposals to:

- Close Meadowbank Special School at the end of the academic year 2017.
- Continue to maintain a Specialist Resource Base (SRB) at Allensbank School but cease admission of pupils with speech and language difficulties, unless transferring from Meadowbank Special School. Redesignate this as an SRB for pupils with autism spectrum conditions (ASC), with first admission of ASC children in September 2018.
- Continue to maintain a Specialist Resource Base at Fairwater School but cease admission of pupils with statements for behaviour emotional and social difficulties. Redesignate this as an Early Intervention Class (EIC) from September 2018.
- Maintain the specialist classes at Glan Yr Afon (Revolving Door) and Springwood (Nurture Class), but rebadge these as Early Intervention Classes, adopting the proposed admission criteria and operational procedures outlined above from September 2018.

### Background

The initial proposal set out a significant reshaping of specialist provision to respond to the changing pattern of special educational needs and the increased capacity of mainstream schools to support special educational needs.

The proposed reshaping would maintain the current level of investment in specialist provision and support for special educational needs, while ensuring a better fit to the current pattern of need.

There has been an ongoing gradual decline in the number of parents who request a specialist speech and language placement for their child, which has resulted in a steady fall in the number of funded places over many years, from 70 places prior to 2006; to 58 places in 2010, and to 34 places in November 2015.

The Council has responded to this shift in expectation by investing in mainstream support over several years. Work to build capacity for speech and language support began in 2010 and remains ongoing. The Council believes the fall in demand/ need for specialist places is a direct result both of parental expectations for mainstream inclusion and the capacity building work that has been done to meet needs more effectively in mainstream.

Alongside the changes affecting speech and language provision, there has been an increased demand for specialist provision for children with special educational needs such as autism spectrum conditions and behavioural emotional and social needs.

ESTYN recognised the rationale for responding to these pressures by re-shaping provision by closing Meadowbank School, redesignating the SRB at Allensbank for ASC and developing a network of Early Intervention Classes.

#### The consultation response

In relation to support for speech and language needs, many respondents acknowledged the effectiveness of the work that has been undertaken in recent years to build capacity and skills in mainstream schools. This work has included a comprehensive training programme; universal early screening for speech and language needs; and a collaborative working relationship between Cardiff and the Vale UHB Speech and Language Therapy Service and the Specialist Teacher Service.

There is also a general acknowledgment among respondents, of the need for some change in the pattern of provision to support speech and language needs.

However, there is a strong consensus among stakeholders regarding the importance of continuing to maintain an effective range of specialist support for children with speech language and communication needs, and concerns that the proposal does not yet fully address this issue.

In particular, strong views have been expressed regarding the need to retain some designated specialist provision for children with the most severe speech and language needs.

Some respondents express the view that special school places should continue to form part of the range of specialist provision. Other respondents put more emphasis on the need for early intervention in the form of resource bases.

Given the strong views expressed by stakeholders it is deemed advisable for additional work to be undertaken to engage with stakeholders more fully prior to bringing forward a revised proposal for consideration.

In developing a revised proposal, the relative benefits and costs of SRB and special school provision will need to be borne in mind. In Council's view, SRBs are a more efficient and effective means of delivering short-term or part-time support. The cost of an SRB place is between one third and one half the cost of a special school place, while the mainstream location of SRBs offers additional benefits for children of ongoing contact with mainstream peers and learning experiences.

In relation to support for behavioural emotional and social needs, many respondents acknowledged the growing demand for specialist provision for children presenting with

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

The Council agrees with this analysis and this factor was key reason for the proposal outlined.

However, there is not yet consensus or sufficient clarity about the criteria and purpose of Early Intervention Classes. Further work is therefore needed to clarify and develop this aspect of the proposal prior to bringing forward a revised proposal for consideration.

The initial proposal to develop a network of Early Intervention Classes was based on a reinvestment of the resources and skills that would be released by closure of Meadowbank School. In the absence of significant new investment, it would not be possible to proceed with these classes while also retaining Meadowbank School.

#### Reason for recommendation

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

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

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



Key:

<b>xx</b>	= very incompatible; very negative effect
<b>x</b>	= incompatible; negative effect
<b>✓</b>	= compatible; positive effect
<b>✓✓</b>	= very compatible; very positive effect
<b>0</b>	= no links; neutral effect
<b>?</b>	= uncertain effects
<b>DNA</b>	= data not available

\* Comparison of the preferred option to do nothing or possible alternative options is required in a SA/SEA.

SEA objective	Proposed Closure of Meadowbank		Do Nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
1. <i>Promote</i> a greener economy by delivering a sustainable pattern of speech language and communication (SLCN) behaviour emotional and social needs (BESN) provision across Cardiff	✓	Achieved as this proposal would provide a better match of supply to demand.	X	Do nothing is not an option as the change in the pattern of special educational needs and demand has to be addressed. However, in view of the concerns of stakeholders expressed during consultation, it is deemed advisable to undertake further work with a view to developing revised proposals.
2. <i>Reduce</i> greenhouse gas emissions through:  a) Energy efficient building design and disposing of poor quality surplus accommodation  b) Promoting sustainable modes of transport and integrated transport systems	N/A	N/A          N/A	N/A          N/A	N/A          N/A
3. <i>Promote health and wellbeing</i> by protecting and enhancing public open space and improving access to	N/A	N/A	N/A	N/A

POS				
4. <i>Minimise</i> air, light and noise pollution associated with building development and traffic congestion	N/A	N/A	<b>N/A</b>	N/A
5. <i>Protect</i> and enhance biodiversity, flora and fauna	<b>N/A</b>	N/A	N/A	N/A
6. <i>Protect</i> and enhance the landscape (habitats/visual amenities)	N/A	N/A	N/A	N/A
7. Conserve water resources and increase water efficiency in new developments and promote sustainable urban drainage systems	N/A	.N/A	N/A	N/A
8. <i>Promote</i> regeneration by delivering inclusive schools that will improve equality of opportunity and access for all	N/A	N/A	N/A	N/A
9. <i>Protect and enhance</i> designated historic assets	N/A	N/A	N/A	N/A

## **Conclusion**

The proposal has been assessed to be largely compatible with the environmental objectives used to assess the goal and principles of the “21st Century Schools: A Strategic Framework for A School Building Improvement Programme” that underpin school organisation proposals.



County Hall  
Cardiff,  
CF10 4UW  
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Neuadd y Sir  
Caerdydd,  
CF10 4UW  
Ffôn: (029) 2087 2088

My Ref: Scrutiny/Correspondence/MJH

24 May 2016

Councillor Sarah Merry  
Cabinet Member - Education and Skills  
County Hall  
Atlantic Wharf  
CARDIFF  
CF10 4UW

Dear Sarah

**Cabinet proposal Meadowbank School – Specialist Provision for Primary Aged Pupils with Speech and Language Difficulties, and with Behavioural, Emotional and Social Difficulties**

The Committee has asked me to write to you following its consideration of the Cabinet report on the proposals for Meadowbank School, views of a number of interested stakeholders, as well as comments contained in the Estyn inspection letter and the Directorate Quarter 4 performance report, at Committee on 17 May 2016.

I was initially contacted by a number of people who were concerned about the proposals for Meadowbank School. As you are aware a Scrutiny Committee may invite anyone whom it believes can make a useful contribution to address it, discuss issues of local concern and/or answer questions. To this end I agreed to include an item on the agenda to enable anyone wishing to express a view on the proposals to address the Committee.

At the Committee meeting a number of parents and staff, the chair of governors and a third sector organisation expressed their wish to address the Committee and / or submit documents for the Committee to consider. The Committee heard some very passionate comments about the education and support provided by the school, and how these proposals could impact on the future outcome of pupils with speech and language difficulties and with behavioural emotional and social difficulties.

The Committee is fully aware that the consultation period had ended, however having read and considered the information in the Cabinet report and reflected on the information provided by the parents, staff and governors the Members agreed to provide you with its comments, concern and recommendations in respect of the policy and service development proposed in the Cabinet report dated 3 December 2015, prior to the final decision being taken by Cabinet.

The Committee also reflected on comments made by Estyn: *“Pupils most at risk of exclusion often have speech and language difficulties”* and also the Director of Education and Lifelong Learning in the Quarter 4 performance report *“There is a decline in performance on both National strategic indicators relating to the timeliness of processing Statements of Special Educational Needs and targets have not been met. The main contributory factors to this decline are*

*1) An increase in the volume of requests for statutory assessments and the associated work*

*2) A commitment to try to resolve issues with parents/carers which often extends timescales*

*3) Challenges in securing placements at specialist provisions*

*4) The capacity of the Education Psychology Service and Local Health Board to respond to the increase in demand for advice.*

*Action to improve performance is focused upon reducing the reliance upon statements to meet children's needs in mainstream schools, by introducing alternative provision, funding models, business processes and improved information sharing."*

The Committee discussed in detail the Cabinet report and information provided, and agreed to raise the following issues for you to take into consideration, prior to the approval of the proposals for Meadowbank School at Cabinet in the near future. We believe that the school should remain open until:

- a. A detailed Cardiff wide strategy for the provision of Speech and Language Difficulties, and with Behavioural, Emotional and Social Difficulties support, is developed, consulted on and implemented.
- b. An assessment of current support for children with Speech and Language Difficulties, and with Behavioural, Emotional and Social Difficulties across Cardiff's primary schools is undertaken, and is determined to be fit for purpose.
- c. The professional views of all primary and secondary head teachers on the impact of pupils with Speech and Language Difficulties, and with Behavioural, Emotional and Social Difficulties currently in their schools is sought and assessed.
- d. Further discussions are held with the school and appropriate third sector organisations on the support and needs of children and young people with Speech and Language Difficulties, and with Behavioural, Emotional and Social Difficulties.
- e. That the school's expertise is promoted as a centre of excellence or as a training centre for teachers across Cardiff and the wider region.
- f. Ensure that the Council continues to provide early specialist intervention, as it is considered to be the most effective and efficient method of managing children with special educational needs.

The Committee also wishes to receive anonymised data on the number and cost of any "Out of County" placements of children with Speech and Language Difficulties,

and with Behavioural, Emotional and Social Difficulties, as it was unable to assess from the Cabinet report the financial impact of the overall proposals.

The Committee recommends that you consider the above points before you agree the final proposals for Meadowbank School, and that you inform the Committee of your views on the above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Cook', with a long horizontal flourish underneath.

**COUNTY COUNCILLOR RICHARD COOK**  
**Chair – Children and Young People Scrutiny Committee**

CC: Nick Batchelar, Director of Education and Lifelong Learning  
Angela Kent, Head of Achievement and Inclusion.



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Fy Nghyf / My Ref: **CM 34796**  
Dyddiad / Date: **8th July 2016**

Councillor Richard Cook  
Chair – Children and Young People Scrutiny Committee  
Cardiff Council  
County Hall  
Cardiff  
**CF10 4UW**

Annwyl/Dear Cllr Cook

### Scrutiny Committee Letter - Meadowbank School

In response to your letter dated 24 May 2016 following the Scrutiny Committee meeting on 17 May 2016 which considered the school organisation proposals for specialist provision for primary aged pupils with speech and language difficulties and with behavioural emotional and social difficulties.

I note the issues you raise within the letter. As you will be aware a post consultation report will be discussed at Cabinet on 14 July 2016 and will also be presented to pre-Cabinet scrutiny on 11 July 2016.

I look forward to discussing the report with you and Scrutiny colleagues at the meeting on the 11 July 2016.

Yn gywir  
Yours sincerely

**Councillor Sarah Merry**  
**Aelod Cabinet Dros**  
**Councillor for Cabinet Member Education**

#### **ATEBWCH I / PLEASE REPLY TO :**

Swyddfa Cymorth Y Cabinet / Cabinet Support Office, Ystafell / Room 518, Neuadd y Sir / County Hall  
Glanfa'r Iwerydd / Atlantic Wharf , Caerdydd/Cardiff, CF10 4UW  
Ffon / Tel: (029) 2087 3837

*Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn sicrhau ein bod yn cyfathrebu â chi yn eich dewis iaith boed yn Gymraeg, yn Saesneg neu'n ddwyieithog dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn creu unrhyw oedi.*

*The Council welcomes correspondence in English and Welsh and we will ensure that we communicate with you in the language of your choice, whether that's English, Welsh or bilingual as long as you let us know which you prefer. Corresponding in Welsh will not lead to any delay.*

