

**SCHOOL ORGANISATION PROPOSALS: IMPROVING  
PROVISION FOR CHILDREN AND YOUNG PEOPLE WITH  
ADDITIONAL LEARNING NEEDS (ALN) 2018-22**

**EDUCATION & SKILLS (COUNCILLOR SARAH MERRY)**

**AGENDA ITEM: 3**

---

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

**Reason for this Report**

1. The purpose of this report is:
  - To inform Cabinet of the implications of the Additional Learning Needs and Educational Tribunal (Wales) Act
  - To inform Cabinet of the projected growth in demand for specialist resource base and special school provision;
  - To seek Cabinet approval of the Cardiff ALN Strategic Priorities 2018-22;
  - To seek Cabinet authority to consult on a range of proposed schemes, to extend and re-align special school and specialist resource base places.

**Background**

2. There are two significant challenges facing Cardiff in relation to provision and support for learners with additional learning needs:
  - Introduction of the Additional Learning Needs and Educational Tribunal Act (ALNET); and
  - The growing number of learners requiring special school or specialist resource base places in order to fully access education and fulfil their potential.

**Legislative change**

3. On 14 December 2017, the Welsh Assembly passed the Additional Learning Needs and Educational Tribunal (Wales) Act (ALNET). The legislation will transform the statutory framework for this area of responsibility, and introduce significant changes to how local authorities

must work with learners, families and partners to support children and young people with additional learning needs.

4. Following Royal Assent, which is anticipated in January 2018, Welsh Ministers will consult on a mandatory Code. The new requirements will apply from September 2020, followed by a three year 'roll-out' period, by the end of which local authorities will be expected to be fully compliant with the Code.

### **Population growth and additional learning needs**

5. At its meeting on the 12 of October 2017, the Cabinet received a report 'Developing the School Estate' which outlined the challenges and opportunities facing Cardiff in the development of the education estate.
6. The report outlined the sufficiency, suitability and condition issues in Cardiff which provide the basis of the funding request from Cardiff to Welsh Government under the 21<sup>st</sup> Century Schools Band B Programme.
7. There has been a significant growth in the numbers of young people with Additional Learning Needs (ALN) since 2012, as reflected in the growing need for special school and specialist resource base places over the last five years. This trend is expected to continue for the next 5-10 years.
8. While the 21<sup>st</sup> Century Schools Band B Programme will provide opportunities to address special school sufficiency issues from 2021 or 2022, there will be a need to take steps to extend provision to meet demand in the intervening period, 2018-22.

### **Cardiff ALN strategic priorities**

9. To respond to these challenges, an ALN Working Group was established in 2016, with representatives from schools, officers, health, children and adult services, parents and Cardiff and the Vale College. The group met throughout the academic year 2016-17, to identify the strategic priorities to improve outcomes for learners with additional learning needs.
10. The working group identified three strategic priorities:
  - Priority One: To improve outcomes for learners with additional needs by successfully implementing the ALN and Educational Tribunal Act
  - Priority Two: To improve outcomes for learners with additional needs by strengthening our collective capacity to meet all needs
  - Priority Three: To improve outcomes for learners with additional needs by ensuring sufficient, high quality additional learning provision

(See Appendix 1, Cardiff ALN Strategy 2018-22)

## **Cardiff ALN Strategic Priorities**

### **Priority One: Successful implementation of the ALN and Educational Tribunal Act (ALNET)**

11. The new law will create the legislative framework to improve the planning and delivery of additional learning provision, through a person-centred approach to identifying needs early, putting in place effective support and monitoring and adapting interventions to ensure they deliver desired outcomes.

#### ***The introduction of the term Additional Learning Needs (ALN)***

12. The Act replaces the terms 'special educational needs' (SEN) and 'learning difficulties and/or disabilities' (LDD) with the new term ALN. This will help to avoid some of the stigma associated with the existing terms and will mark a clear break from the current systems that are no longer fit for purpose. Using ALN as a single term which encompasses children and young people aged 0-25 reflects the move to a fairer system for supporting learners with ALN across early years, schools and Further Education settings.

#### ***A 0-25 age range***

13. There will be a single legislative system relating to the support given to children and young people aged between 0-25 years who have ALN. This is instead of the two separate systems currently operating to support children and young people of compulsory school age who have SEN; and young people in further education who have LDD. As a result, transition of learners between school and post-16 education will be improved to allow greater support and rights for this group of learners.

#### ***A unified plan***

14. The Bill will create a single statutory plan (the individual development plan (IDP)) to replace the existing variety of statutory and non-statutory SEN or LDD plans for learners in schools and further education. The IDP will replace both statements of SEN and Individual Education Plans (IEPs), which currently apply to learners with needs at 'School Action' or 'School Action Plus'. This will ensure greater consistency and continuity and, unlike the current system, ensure that provision and rights are protected regardless of the severity or complexity of needs.

#### ***Increased participation of children and young people***

15. The Bill requires that learners' views should always be considered as part of the planning process, along with those of their parents. It is imperative that children and young people see the planning process as something which is done with them rather than to them.

### ***High aspirations and improved outcomes***

16. The emphasis of IDPs will be on making provision that delivers tangible outcomes that contribute in a meaningful way to the child or young person's achievement of their full potential.

### ***A simpler and less adversarial system***

17. The process of producing and revising an IDP should be much simpler than is currently the case with statements of SEN and should avoid the adversarial nature of the existing approach.

### ***Increased collaboration***

18. The new system will support a strong focus on collaboration and information sharing between agencies, which are essential to ensuring that needs are identified early and the right support is put in place to enable children and young people to achieve positive outcomes. Three fundamental new roles are created by the Bill to facilitate increased collaboration – Additional Learning Needs Coordinators in education settings; Designated Educational Clinical Lead Officers in health boards; and Early Years ALN Lead Officers in local authorities.

### ***Avoiding disagreements and earlier disagreement resolution***

19. The new system will focus on ensuring that where disagreements occur about an IDP or the provision it contains, the matter is considered and resolved at the most local level possible.

### ***Clear and consistent rights of appeal***

20. Where disagreements about the contents of an IDP cannot be resolved at the local level, the Bill will ensure that children and young people entitled to an IDP or those who believe that they should have an IDP (and their parents in the case of those that are under 16 years) will have a right of appeal to the Education Tribunal for Wales.

### ***A mandatory Code***

21. The provisions included in the Bill will be supported by a new statutory ALN Code. The Code will ensure that the new ALN system has a set of clear, legally enforceable parameters within which local authorities and those other organisations responsible for the delivery of services for children and young people with ALN, must act.
22. It will, therefore, be a type of subordinate legislation, and confer duties and rights on those subject to it. The Code will also set out practical guidance on how the statutory duties will be carried out, which will be supported by best practice illustrations.

## ***A bilingual system***

23. Services will be required to consider whether the child or young person needs ALP in Welsh. If they do, this must be documented in the IDP and 'all reasonable steps' must be taken to secure the provision in Welsh. A series of strategic duties are also aimed at driving progress towards a truly bilingual ALN system and the Bill includes a mechanism so that the duties to provide Additional Learning Provision through the medium of Welsh become absolute over time.
24. The ALN Working Group has identified 5 objectives under Priority One:
1. To work with partners in Health, Children's and Adult Services, Cardiff and the Vale College and other education providers to develop effective approaches to unified assessment and planning for ALN learners 0-25.
  2. To support development of the ALN Coordinator role and the introduction of Person Centred Planning (PCP) approaches in schools.
  3. To work with parents/ carers, schools, early years settings and post-16 education providers to further improve support for transition at every stage of education: pre-school; primary to secondary; post-16; to adult life.
  4. To further develop the quality of ALN specialist services, in both Welsh and English, to support schools and early years settings.
  5. To work with families and partners to further improving processes for avoiding and resolving conflict.

## **Priority Two: Strengthening our collective capacity to meet all needs**

25. The majority of learners with additional learning needs attend a mainstream school. In October 2017 there were 10,426 school-aged pupils with additional learning needs in Cardiff.
26. 9,640, or 92%, were attending mainstream schools, while just under 800, or 8%, attended either a Cardiff special school or a setting other than a Cardiff school ('out of county'). This is summarised in the table below.

6,042 learners had needs at 'School Action'	Learners whose additional needs can be met with extra support provided by their school.  Needs at this level are often short term, but some pupils may go on to have needs at 'School Action Plus'.
2,445 had needs at 'School Action Plus'	These are pupils whose needs can be met by their school, with the help of extra advice, support or training from a specialist service (this might be an NHS service, or educational psychology, or one of the specialist teacher teams).

	Many pupils make progress and their needs return to 'School Action', but a few will go on to require a statement.
800 had statements of SEN, with mainstream support.	Schools receive additional delegated funding and have access to a range of specialist services to support pupils with mainstream statements.
340 had statements of SEN, and attended specialist resource bases	<p>A specialist resource base (SRB) is a small class in a mainstream school, taught by specialist staff. Although the SRBs are located in community schools, they admit pupils from across the authority, not just from their own local area. Pupils in a specialist resource base benefit from being taught in small classes with favorable pupil-staff ratios, taught by specialist staff. Pupils also benefit from opportunities to learn and play with their mainstream peers.</p> <p>Cardiff funds 24 specialist resource bases, across primary and secondary, in Welsh and English medium settings.</p>
580 pupils attended Cardiff special schools	Special schools provide a highly specialized education for pupils with the most complex additional needs. Class sizes are small and the curriculum is highly differentiated, taught by specialist staff. Cardiff maintains seven special schools.
Approximately 220 pupils attended settings other than a Cardiff maintained school: 'out of county'.	<p>This includes</p> <ul style="list-style-type: none"> <li>• Children and young people who are looked after by Cardiff Council, have a statement of SEN and are fostered in other areas. Cardiff is responsible for funding the additional learning provision made by the relevant local authority, whether this is special school, specialist resource base or mainstream support.</li> <li>• Pupils funded to attend maintained special schools in other local authorities; for example in Ysgol y Deri in the Vale of Glamorgan, where Cardiff funds up to 40 places for Cardiff pupils.</li> <li>• 113 pupils were attending independent settings, including private schools and alternative education providers.</li> </ul>

27. The ALN Working Group identified a number of actions that are needed to improve the collective capacity of schools and their partners to improve outcomes for learners with additional learning needs, and to make the most effective use of ALN resources.

28. Over a three year period, from 2014-15, to 2016-17, the cost of mainstream statements (Complex Needs Enhancement) increased from

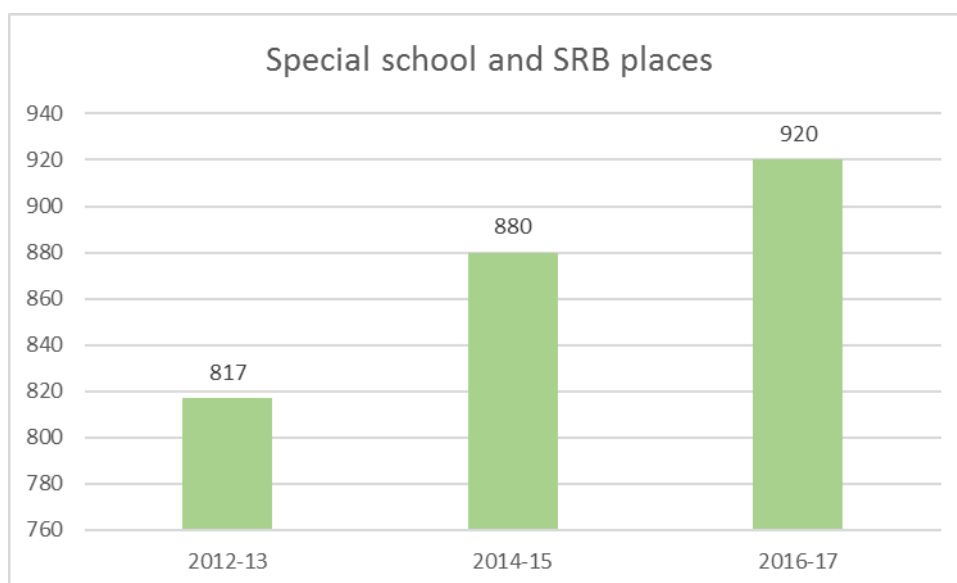
£4.8M to £6.3M per annum; an increase of 63%. By April 2017 there were 724 pupils with CNE funded statements, mostly used to employ Grade 3 LSAs (Learning Support Assistants) to provide 'one-to-one support'.

29. Although a growing number of pupils do require individual or small group support throughout the day, over use of 'one-to-one support' is not always the most efficient use of resources, or the most effective way to support pupils.
30. The way in which mainstream statements (or IDPs) are written needs to be reviewed, to empower schools to use delegated ALN budgets more flexibly.
31. The increased costs are partly due to pressure on existing special school and specialist resource base places, resulting in some children remaining in mainstream while awaiting a more specialist placement. Increasing the number of specialist resource bases in our schools has the potential to reduce costs while ensuring learners continue to receive the high quality, comprehensive support they need.
32. The ALN Working Group reviewed the wide range of quality support and services that are provided in Cardiff schools and concluded that an up-to-date, parent-friendly directory is needed, to make it easier for parents, schools, health practitioners and social workers to have access to comprehensive information about available support, and to help them navigate the system.
33. The culture of school-to-school support is developing and embedded in many schools. However, school-to-school working in relation to inclusion is not yet structured or formalised. Systems for identifying and sharing best practice in relation to ALN need to be strengthened.
34. The number of children and young people with disabilities and healthcare needs in mainstream schools is also increasing, and it is essential that schools continue to develop as accessible learning environments.
35. Under Priority Two, the ALN Working Group set out 5 objectives to address these issues:
  1. To work with Health, Children's and Adult Services, and other partners to further develop the capacity to meet needs, including effective approaches to early intervention.
  2. To improve the quality and availability of information about additional learning provision.
  3. To further develop the culture of school-to-school support to enable schools to access best ALN practice.
  4. To empower schools to achieve best value through the more flexible use of delegated ALN budgets.

5. To refresh the Cardiff Accessibility Strategy and guidance for schools to ensure children and young people with disabilities and healthcare needs are effectively included in learning.

### **Priority Three: Ensuring sufficient, high quality additional learning provision**

36. As illustrated in the graph below, the number of funded special school or specialist resource base places in Cardiff schools has increased by 103 places over a five year period. (The graph does not include places funded in other local authorities or the independent sector.)



37. Despite the growth in places, there is evidence to suggest this has not been sufficient to meet existing need. For example, the 63% rise in the cost of supporting mainstream statements, and increased reliance on places in the independent sector suggests there are pupils in our mainstream schools and in 'out of county' settings who would benefit from access to a Cardiff special school or specialist resource base place.
38. Over the next 5-10 years, revenue and capital investment will be needed to ensure sufficient and suitable specialist support for the growing population of learners with additional learner needs, and to reduce reliance on the independent sector. Increased demand is anticipated for learners with:
  - Emotional health and wellbeing needs
  - Complex learning disabilities
  - Autism spectrum conditions
39. In contrast, demand for specialist places designated for specific language impairment has fallen since 2010. Between 2010 and 2015, the collective pupil roll at Meadowbank Special School and Allensbank specialist resource base – both of which are designated for 'specific language impairments- fell from 58 to 34.



40. In 2015-16 the Council formally proposed closing both settings and re-allocating the resource to other areas of need where demand is growing.
41. However, stakeholders raised a range of objections to this proposal and the Council decided not to proceed, but to engage further with stakeholders and to undertake a review of speech and language support.
42. In December 2016, a reference group was established to provide a forum for stakeholders, including parents, teaching staff, governors and the voluntary sector, to comment and contribute to the evaluation of current services.
43. The reference group submitted a summary of its findings and recommendations in September 2017 (see Appendix 2 Report on Speech Language and Communication Support in Cardiff, 2017). The work of this group, and the recommendations, have informed the proposals below in relation to both Meadowbank School and Allensbank specialist resource base.
44. The report to Cabinet in December 2017, '21<sup>st</sup> Century Schools- Cardiff Council's Band B priorities' identifies four capital schemes to re-shape Cardiff special school provision. The schemes would enable the Council:
- to replace the 'D' rated accommodation at Riverbank, Woodlands, the Court and Greenhill Schools
  - to increase capacity to meet future projected need from 2022-27
  - address the gaps in provision such as places for girls and for post-16 pupils with emotional health and wellbeing needs
  - to enhance opportunities for multi-agency support and provision;
  - to enhance the role of special schools as a source of support for families and for mainstream schools.
45. However, the Band B schemes will not be completed until 2021 at the earliest. The Council will therefore need to take steps to extend the number of places over the next three years.
46. Projections suggest that approximately 220 additional special school and specialist resource base places will be needed over the next 4 years, at both primary and secondary level, across Welsh and English medium sectors.
47. There are therefore two objectives under Priority three:
1. To develop additional SRB and special school places to meet current and projected need 2018-22 through an ALN Development Plan 2018-22
  2. To consult with schools and other partners on 21<sup>st</sup> Century Schools Band B options for re-shaping specialist provision, to ensure suitability and sufficiency for projected needs 2022-27.

## **Business Case For An ALN Development Plan 2018-22**

48. Failure to invest in Cardiff-maintained provision over the next 3-4 years will lead to the Council becoming increasingly reliant on independent special school providers in order to meet the Council's statutory responsibilities.
49. Over reliance on independent places would have the following implications and risks:
  - higher revenue costs to the Council
  - inability to offer places according to parental preference
50. The cost of independent special school places ranges from £39K to £77k per annum, compared to costs for Cardiff special schools of £14k to £25k per annum. It is rarely in a pupil's interest to transfer school mid-phase so once placed there is little prospect of pupils returning to maintained provision should places become available in future years. The costs would therefore continue over 7-8 years for placements beginning in Year 7, and potentially longer for primary placements.
51. The majority of Cardiff parents express a preference for places in Cardiff special schools or specialist resource bases for their child. Offering places in independent schools could have negative reputational implications.
52. It should be noted that there is no guarantee the independent sector could offer sufficient special school places to meet Cardiff's sufficiency needs, especially for primary aged pupils. Over-reliance on the sector could therefore result in Cardiff being unable to fulfil statutory responsibilities.

## **ALN DEVELOPMENT PLAN 2018-22: PROPOSED SCHEMES**

53. The schemes proposed below will not fully address sufficiency needs for the period 2018-22.
54. The Council has taken, and will continue to take, a range of steps to increase provision within existing accommodation and designated numbers wherever possible. Such actions do not require formal consultation unless they require a 'regulated alteration'.
55. It is also anticipated that further schemes will need to be developed and proposed in 2019, to open additional specialist resource bases at both primary and secondary phase.
56. The proposed schemes set out below require 'regulated alterations'. Under the Schools Standards and Organisation (Wales) Act 2013, a local authority can make proposals to make regulated alterations and is required prior to publishing its proposals to undertake a consultation on those proposals in accordance with section 48 of that Act and the School Organisation Code.
57. Any proposals must be the subject of full and fair consultation and due regard must be had by the Cabinet to the responses before a final decision is taken.

## Ty Gwyn Special School

58. Ty Gwyn is a special school designated to provide 150 places for learners aged 3-19 with complex learning disabilities and autism spectrum conditions (ASC). The school is located in Caerau and from 8<sup>th</sup> January 2018 the school has been federated with Riverbank and Woodlands Special Schools, as the Western Learning Campus Federation.
59. **PROPOSAL: To meet demand for primary and secondary special school places for learners with complex learning disabilities or ASC it is proposed to**
- **increase the designated number of Ty Gwyn places to 198;**
  - **establish 3 extra classrooms by adapting the old Trelai Youth Centre building, which is situated to the rear of the school**
60. Since the new Ty Gwyn building opened in 2010, the number admitted to the school each year has exceeded the number of leavers by between 4 and 10 places. There are now 173 pupils on roll. The trend is projected to continue for the next three years, until the last of the smaller cohorts have left the school. From 2021, the cohorts leaving the school will be larger in size, and more consistent with the annual admission number.
61. A multiagency project has been established under the Disability Futures Programme, to redevelop the Trelai Youth Centre building as a multi-agency resource attached to the Western Learning Federation Campus. The project is exploring the potential to develop one side of the building as a hub for multi-agency regional services, and to increase the use of the existing sports and play facilities for children and young people with complex needs, in school hours, for holiday and after school provision.
62. It is proposed to adapt part of the building to provide three new classrooms for the school, and to connect the school and youth centre buildings via an enclosed corridor or walkway. Council funding would be required to secure the conversion.
63. The Council recognises that the proposal has implications for health services provided in partnership with the school. The Council will work with Cardiff and the Vale University Health Board, to continue to ensure children's assessed needs are met, and to further develop collaborative approaches to promote wellbeing and positive outcomes for pupils at the school.
64. An initial appraisal of highways and transport implications has been completed, however all options will be subject to a full transport assessment. The initial assessment indicates that staff parking adjacent to Trelai Park could be utilised for school staff in order to create a larger drop off/pick up and turning circle on the existing staff carpark for minibuses. Staggered start and finish times for Riverbank, Woodlands and Ty Gwyn would reduce site congestion. Active Travel/Sustainable Travel

would be encouraged for all staff and visitors to the school. An approximate cost for these works has been provided and included in the total budget.

### **The Hollies Special School**

65. The Hollies is a special school designated to provide 90 places for learners aged 4-11 with autism spectrum conditions and physical and medical needs. The school is located in Pentwyn.
66. **PROPOSAL: To meet demand for primary and secondary special school places for learners with autism spectrum conditions it is proposed to:**
- **extend the age range of The Hollies School from 4-11, to 4-14**
  - **increase the designated place number to 138**
  - **provide additional accommodation by refurbishing the school accommodation to be vacated by Ysgol Glan Morfa following its occupancy of the new building currently under construction**
67. The demand for places for physical and medical needs has fallen over several years, while the autism section has grown. All pupils at the school are now pupils with autism spectrum conditions.
68. Over next few years both primary and secondary places for learners with autism spectrum conditions will be needed. Extending both the designated place number and the age range of the school would provide the extra capacity needed at both primary and secondary phase.
69. Ysgol Glan Morfa is due to transfer to new build premises in August 2018. It is proposed that the vacated school accommodation on Hinton Street, Splott be converted to provide additional accommodation for The Hollies School.
70. The Glan Morfa building is in generally good condition but would require some minor refurbishment and adaptation.
71. Options for the configuration of the extended Hollies School would be subject to further discussion with the Headteacher and the Governing Body, prior to consultation. For example, options might include:
- the Hinton Street site to become a KS3 setting, with Foundation Phase and KS2 remaining on the current Pentwyn site;
  - Foundation Phase provision could be relocated to the Hinton Street site with the Pentwyn building providing accommodation for KS2 and KS3.
72. Currently the secondary options for pupils leaving The Hollies in Year 6, include:

- The Marion Centre, Bishop of Llandaff School
  - Ty Gwyn Special School
  - Ysgol y Deri Special School, Vale of Glamorgan
73. These options would continue to be available to Hollies Year 6 pupils, in addition to the option of continuing at The Hollies for KS3. Pupils who take up a KS3 place at The Hollies would have the opportunity of transferring to one of the above listed schools for their Key Stage 4 placement.
74. The Council recognises that the proposal has implications for health services provided in partnership with the school. The Council will work with Cardiff and the Vale University Health Board, to continue to ensure children's assessed needs are met, and to further develop collaborative approaches to promote wellbeing and positive outcomes for pupils at the school.
75. An initial appraisal of highways and transport implications has been completed, however all options would be subject to a full transport assessment. The initial assessment indicates that additional staff parking and a turning circle for additional traffic would be required in order to reduce congestion and manage any additional traffic better. Ensuring that start and finish times varied from those of Moorlands Primary School, on Singleton Road, would be required to reduce congestion. Active Travel/Sustainable Travel would be encouraged for all staff and visitors to the school.

### **Greenhill School**

76. Greenhill School is a special school designated for pupils with emotional health and wellbeing needs aged 11-16. The school is located in Rhiwbina.
77. One of the prioritised schemes identified in the report approved by cabinet on 14<sup>th</sup> December 2017, '21<sup>st</sup> Century Schools- Cardiff Council's Band B priorities', is to build a new secondary special school for pupils with emotional health and wellbeing needs. The Band B scheme would enable the Council to replace the current accommodation for Greenhill School which is rated 'D' for suitability. The proposal set out below would be independent of the Band B scheme, although it would pave the way to deliver on one of the goals of the Band B scheme- to include provision for post-16 in a future new school.
78. **PROPOSAL: To meet the need for post-16 places for emotional health and wellbeing needs it is proposed to**
- **extend the age range of Greenhill from 11-16 to 11-19 and**
  - **increase the capacity of the school to allow for up to 64 places.**
79. Data for Cardiff shows that the majority of Greenhill pupils struggle to make a successful transition to education, employment or training at the end of Year 11, despite significant support for transition. 2015-17 data shows

that 50% or more of Greenhill leavers were not in education employment or training on 31<sup>st</sup> October.

Cohort	Cohort Size	NEET	%
2015	18	10	56
2016	6	3	50
2017	10	5	50

80. The post-16 class would provide a 'bridging year' for Greenhill pupils not yet ready for transition to college or employment at the end of Year 11. Pupils would be supported to make a successful transition to college, training or employment by the end of Year 12.
81. Accommodation would be established by adapting the unused caretaker house on the site. Post-16 pupils would attend some classes on site, but would also be supported to access appropriate educational opportunities off-site, as part of a supported transition to college or employment.
82. This proposal would require determination by Welsh Ministers to extend the age range of Greenhill School to include post-16 education.
83. The Council recognises that the proposal has implications for health services provided in partnership with the school. The Council will work with Cardiff and the Vale University Health Board, to continue to ensure children's assessed needs are met, and to further develop collaborative approaches to promote wellbeing and positive outcomes for pupils at the school.
84. An initial appraisal of highways and transport implications has been completed, however all options would be subject to a full transport assessment. The initial assessment indicates that the existing arrangements are suitable for the site. Travel Training should be encouraged for all pupils to promote public transport where possible. Active Travel/Sustainable Travel would be encouraged for all staff and visitors to the school.

### **Meadowbank Special School**

85. Meadowbank is a special school designated for up to 40 places for pupils aged 4-11 with specific language impairments. The school is located in Llandaff North and admits pupils from across the authority. The number on roll at the school has fallen over several years and currently stands at 15.
86. **PROPOSAL: To meet demand for primary special school places for complex learning disabilities, it is proposed to**
  - **change the designation of Meadowbank School from: 'specific language impairments', to: 'speech language and communication needs *and* complex learning disabilities'**

87. It is important to note that the diagnosis of 'specific language impairment' is no longer used. It is therefore proposed to replace it in the school's designation with the broader term: 'speech language and communication needs'. Under the current designation, the school admits pupils whose speech and language needs are specific, long term and severe. If the designation were changed as proposed, the school would continue to admit pupils whose speech and language needs are specific, long term and severe, but would also admit pupils with complex learning disabilities.
88. Changing the designation of the school is in line with one of the recommendations put forward by the speech and language reference group and would ensure
- continued special school places for learners with the most severe and long term speech language and communication needs;
  - additional places for complex learning disabilities;
  - continued financial viability of Meadowbank School.
89. Children with complex learning disabilities frequently have associated speech language and communication difficulties, and would benefit from the specialist knowledge and experience of Meadowbank staff. Training and professional development opportunities would be offered to staff, to further develop their skills and specialist knowledge to support complex learning disabilities.
90. It is anticipated that the school would determine the best approach to supporting a range of needs. This could involve mixed classes, if the learning needs are similar, or separate classes to meet different needs.
91. The local authority commissions the school to provide an outreach service to support children with speech language and communication needs in early years settings. It is proposed to maintain this outreach service and, in partnership with the school, to consider scope to further develop their role in building capacity to support speech and language needs, especially in other special school settings such as Riverbank and The Court, and at specialist resource bases for children with complex learning disabilities.
92. Current accommodation at Meadowbank is in good condition but some adaptations to the building would be needed, including provision of a changing space and improvements to the accessibility of the building.
93. An initial appraisal of highways and transport implications has been completed, however all options would be subject to a full transport assessment. The initial assessment indicates that the school has a turning circle which is suitable for the pupils who would be accessing the premises. A variety of highways improvements are already planned as part of the Ysgol Glan Ceubal and Gabalfa Primary new build. Active Travel/Sustainable Travel would be encouraged for all staff and visitors to the school.

## Alternative options considered

94. Changing the designation to include either autism spectrum conditions or emotional health and wellbeing needs was considered. However, the accommodation at the school is considered to be less appropriate for these groups.
95. The speech and language reference group recommended the Council give consideration to opening 'early intervention' classes. Classes of this type would offer time-limited placements to learners whose speech and language needs are not expected to be long term, but who are not making enough progress with mainstream support alone. The group suggested an early intervention class could be hosted at either Meadowbank or Allensbank School.
96. The Council is not proposing to open early intervention classes at Meadowbank School for the following reasons:
- a) The majority of pupils with speech and language needs make more rapid progress when exposed to frequent, informal opportunities to interact, play and learn with peers who do not have speech or language difficulties. These mainstream opportunities are more easily and naturally available to pupils in a specialist resource base.
  - b) Special schools can strive to offer similar opportunities through reintegration programmes and day placements, but these opportunities entail the extra costs of sending support assistants with the child, and making different travel arrangements on different days.
  - c) Many parents of children with speech and language needs prefer their child to remain in mainstream. The local authority believes that early intervention classes should be based in a mainstream school, to take account of parental views, and to better facilitate early reintegration to a local school.

## **Allensbank Primary School**

97. Allensbank is an English-medium community primary school located in Heath. The school hosts a 16-20 place specialist resource base (SRB) designated for pupils with specific language impairments.
98. **PROPOSAL: To meet the need for early intervention places for speech and language needs, it is proposed to**
- **Phase out the SRB at Allensbank School, closing the class in July 2020, or when all current pupils have completed their primary placement, if earlier.**
  - **Open an 8-place early intervention class for children with speech and language needs at Allensbank School, admitting the first cohort in September 2019.**



99. The class would admit up to 8 Foundation Phase children who were not making sufficient progress, but who have good prospects for returning to their local mainstream school. Placements would last 1-3 years, depending on progress. Pupils would be dual registered at their local school, and supported to return at the end of the placement. Pupils would continue to attend their local school for at least one day a week, to maintain links with local friends and to prepare for a successful early reintegration to their local school.
100. As part of the review of speech and language support, the Council has reviewed statementing trends for speech and language needs. Over the last five years, as early screening and capacity building for early intervention has been rolled out, the number of statements for speech and language needs has fallen. The Council now issue fewer statements and most are issued later than previously, when the child has already reached Key Stage 2.
101. Reducing the need for statements is a measure of successful early intervention. However, because placement in the specialist resource base has been dependent on a statement of SEN, an unintended consequence has been to limit access to specialist provision for Foundation Phase pupils.
102. The view of the Speech and Language Therapy Service is that intensive support in a special class is most effective if provided as early as possible. Placements at the early intervention class would therefore be identified by the specialist speech and language panel and would not be dependent on a statement.
103. The Council has reviewed the caseloads for pupils known to the Joint Speech and Language Service in 2017 in order to predict the level of need for an early intervention class. 8 places in an English medium setting would be appropriate to meet current need. This will be monitored, and consideration given to opening a second class in future, as required.
104. There would be insufficient demand for a Welsh medium class at present. This will be monitored, and consideration would be given to opening a class in future, as required. In the meantime, an intensive support package in mainstream can be developed if there are individual pupils in Welsh schools who are not making sufficient progress with school support.

### **St Mary the Virgin Church in Wales Primary School**

105. St Mary the Virgin CiW is an English-medium Voluntary Aided primary school located in Butetown. There is no specialist provision at the school currently.
106. **PROPOSAL: To meet the demand for primary specialist resource base places for complex learning disabilities, it is proposed to**
- **open a specialist resource base (SRB) at St Mary the Virgin CiW Primary School, for up to 20 places.**

107. Admissions to the SRB would be managed by the local authority, subject to a statement of special educational needs and would be open to pupils from across the authority.
108. There are four Cardiff primary schools currently hosting SRBs for complex learning disabilities: Bryn Hafod; Llanedeyrn; Llanishen Fach and Marlborough. All SRBs are open to admission from across the authority, although as far as possible, pupils are offered places in the SRB closest to their home. Provision of an SRB at St Mary the Virgin would increase the number of places available to meet demand, and ensure that pupils living in the south central area of the city travel shorter distances to access specialist provision.
109. In 2015 the council consulted on proposals to build new school accommodation for St Mary the Virgin School. In their formal response the Governing Body requested the local authority to consider opening a specialist resource base at the school. Given the growing demand for SRB places, the local authority agreed in principle to consider this development, subject to a further statutory consultation.
110. Accommodation for the SRB would be provided as part of the 21<sup>st</sup> Century Schools Band B scheme to rebuild St Mary the Virgin School. The SRB would not open until the new build accommodation has been provided.
111. As a voluntary aided school, the determination would need to be made by the governing body of the school.

### **Ysgol Pwll Coch**

112. Ysgol Pwll Coch is a Welsh-medium community primary school located in Canton. There is no specialist provision at the school currently.
113. **To meet the demand for primary SRB places for with complex learning disabilities and autism spectrum conditions in the Welsh medium sector, it is proposed to**
  - **open a specialist resource base at Ysgol Pwll Coch, providing up to 10 places initially, but with scope to extend to 20 places in future, as demand grows.**
114. Admissions to the SRB would be managed by the local authority, subject to a statement of special educational needs and would be open to pupils from across the authority.
115. Accommodation for the SRB would be established within current accommodation. Some refurbishment would be required.
116. An initial appraisal of highways and transport implications has been completed, however all options would be subject to a full transport assessment. The initial assessment indicates that a staggered start time and finish time for the SRB would need to be implemented to alleviate traffic and to reduce congestion at the beginning and end of the day on Lawrenny Avenue. Active Travel/Sustainable Travel would be encouraged for all staff and visitors to the school.

117. There is a long-established specialist resource base at Ysgol Coed y Gof, designated to offer up to 10 places for all areas of additional learning need. This is not sufficient to meet current and future demand.
118. The Council has identified between 5 and 10 pupils in Welsh medium schools who might benefit from a place in an SRB, but there is insufficient accommodation to open an additional SRB class at Ysgol Coed y Gof. The local authority is working with Ysgol Coed y Gof to review the SRB and to improve accommodation and facilities, but this is not subject to a formal proposal or consultation as it does not constitute a 'regulated alteration'.

### **Ysgol Glantaf**

119. Ysgol Glantaf is a Welsh-medium community high school located in Llandaff North. The school hosts a specialist resource base designated for complex learning disabilities and autism spectrum conditions.
120. **To meet the demand for secondary SRB places for complex learning disabilities and autism spectrum conditions in the Welsh medium sector it is proposed to:**
  - **extend the designated number at Ysgol Glantaf specialist resource base to up to 30 places**
  - **extend and improve the current accommodation for the SRB**
121. Admissions to the SRB are managed by the local authority, subject to a statement of special educational needs. The SRB offers places to pupils from across the city.
122. Demand for places in the base has been increasing steadily for the last 5 years and there are currently 14 pupils on roll. Projections suggest the number will grow to 30 places over the next 3-5 years.
123. The current SRB accommodation would be extended and improved to facilitate the additional numbers.
124. The local authority will continue to monitor and regularly audit the level of demand in the sector and bring forward further proposals to further extend provision in future as required. A regional audit of ALN needs and provision across the central South Consortium area is also underway, as outlined in paragraph 147 below.

### **Capital and revenue implications of proposed schemes**

125. The potential revenue cost of funding additional places in 2018-19 is estimated at £630,000. This includes both the proposed schemes set out in this report, and steps to increase places within current designations, which will not require consultation. The potential capital cost of extending special school and specialist resource base provision from 2018-21 is estimated at £6M over three years, including the schemes proposed in this report.

## **Educational Benefits**

126. The proposals would offer the following educational benefits:

- Addressing ALN sufficiency needs projected in 2018-21, ensuring children and young people can access high quality education in Cardiff special schools or specialist resource bases, in both English and Welsh medium sectors.
- Development of the Trelai Youth Centre will provide additional sports facilities for use across the Western Learning Campus Federation, access for community use, and opportunities to further develop multi-agency collaboration on site, including provision of outreach services, to the benefit of ALN learners aged 0-25.
- A sustainable future for Meadowbank School, ensuring children with speech and language needs or complex learning disabilities can continue to benefit from the expertise and facilities offered by the school.
- Improved post-16 opportunities for young people with severe emotional health and wellbeing needs.
- Opening a new SRB in the South Central area of Cardiff will improve access to specialist provision for children in the area, and reduce the need for SEN transport.
- Increased capacity for early intervention to support children with speech and language needs.

## **Potential disadvantages of the proposal**

127. The following potential disadvantages have been identified:

- Extending numbers at Ty Gwyn, Hollies and Greenhill special schools could impact on health provision at these schools.

## **Alternatives considered**

128. As outlined in paragraphs 48-52, the only alternative to extending special school and SRB places in Cardiff maintained schools would be to seek places in the independent sector. The option has been dismissed as the revenue costs of this step would be greater than the combined capital and revenue investment required by the proposed schemes.

## **Impact of proposal on the Welsh Language**

129. The proposed schemes include extending and improving specialist provision for learners with autism spectrum conditions and complex learning disabilities, at Ysgol Pwll Coch and Ysgol Glantaf.

130. Additional work is underway to further develop the range of provision, including:

- A review of the specialist resource base at Ysgol Coed y Gof

- In 2017-18 the local authority is funding a pilot approach to supporting emotional health and wellbeing needs in the secondary phase.
  - An audit of speech and language needs to inform the development of early intervention for children in the Welsh sector.
131. In partnership with Bridgend, RCT, Merthyr and the Vale of Glamorgan local authorities, a regional audit of ALN provision is being carried out, to identify opportunities for regional solutions and sharing of best practice. Across all 5 authorities, the number of ALN pupils is significantly lower than in English medium. The audit will consider the reasons for this and seek parental and school views. The audit will be completed by March 2018.
132. It is anticipated that further schemes to develop provision in Welsh medium will be developed under the ALN Development Plan, and brought forward for Cabinet consideration.

### **Local Member consultation**

133. Local Members of directly affected wards have been appraised of the proposal to consult and will be included as part of any consultation undertaken along with all elected members.

### **Scrutiny Consideration**

134. The Children & Young People's Scrutiny Committee considered this item at their meeting on 9 January 2018. The letter from the Chair is attached at Appendix 3.

### **Reason for Recommendations**

135. To improve outcomes for children and young people with additional learning needs, by approving the Cardiff ALN Strategy, and authorising consultation on the proposed schemes to extend specialist provision from 2018.

### **Financial Implications**

136. The recommendations to this report request authority to consult on a range of ALN proposals, including expansions to special schools and specialist resource bases, as well as the introduction of new specialist resource bases in some instances. The proposal to consult on these schemes does not, in itself, give rise to specific financial implications. However, should these schemes be progressed, following consultation, there would be both revenue and capital financial implications.
137. Paragraph 125 outlines the potential capital costs of the works required as totalling £6m. Revenue costs could also be significant, rising to over £1m in certain years. The costs arising from these schemes will need to be funded, in the first instance, from existing budget allocations. In the case of the revenue costs, the delegated school budget, and any growth in that budget provided as part of future Council budgets, will need to provide the

funding required. In relation to capital costs, the existing allocations for School Suitability Works, as approved in the Council's Capital Programme for the five year period commencing 2017/18, will need to provide the funding required for works to buildings and other asset expenditure. However, this particular allocation is also used for non-ALN expenditure and, therefore, the scope for this allocation to meet all of the costs arising is potentially limited. .

138. Should the current levels of funding be insufficient to fund the costs of all schemes, and additional funding not be provided as part of future Council budgets, it will be necessary for a re-prioritisation of schemes to be undertaken to ensure that only schemes that are affordable are delivered. However, it is necessary to understand the financial risks involved in not progressing all of the schemes proposed in this report. Particularly, should it not be possible to accommodate all of the potential growth in demand for ALN provision, it is likely that the total Council expenditure on out of county placements will increase. The average cost of a placement in a non-Cardiff Council school exceeds that of in-house provision and, therefore, represents poorer value for money. However, if out of county placements are unavoidable, it would be necessary for the cost of these to be met from existing budget allocations and, where these are insufficient, for the additional costs incurred to be absorbed within the overall Education directorate revenue budget in the relevant year.

### **Legal Implications**

139. Under the Education Act 1996, the Council has a general statutory obligation to promote high standards of education and to consider parental preference which includes preference for Welsh medium education. The Council also currently has obligations under the Education Act 1996 to carry out statutory assessments, create, amend and maintain statements of Special Educational Needs and to provide for pupils with Special Educational Needs.
140. The Additional Learning Needs (Wales) Bill was agreed by the National Assembly for Wales on 12<sup>th</sup> December 2017. The report details the changes this will make, one of the most significant being the extension of the age range for pupils that the Council will be responsible for to all pupils between birth and 25 years old and that this will lead to an extension of the rights of appeal to the Special Educational Needs Tribunal for Wales (which will be renamed the Educational Tribunal for Wales).
141. 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. The 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
142. The National Assembly for Wales carried out an equality impact assessment in November 2017 in relation to the Additional Learning Needs (Wales) Bill and identified no negative impact on any groups with protected characteristics; the assessment acknowledged that there was a potential to eliminate discrimination in transforming the services for all pupils with additional learning needs. If the recommendations in the report are accepted and consultation undertaken, the Council will have to consider further the equalities implication and an Equality Impact Assessment may need to be completed. The Council has to be mindful of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards when making any policy decisions and consider the impact upon the Welsh language, the report and Equality Impact Assessment deals with all these obligations. The Council has to consider the Well-being of Future Generations (Wales) Act 2015 and how this strategy may improve the social, economic, environmental and cultural *well-being* of Wales.
143. The Council also has to consider its obligation under section 88 and schedule 10 of the Equality Act 2010 to prepare and implement an accessibility strategy. The strategy should increase disabled pupils' access to the curriculum and improve the physical environment and the provision of information. Section 84 and 85 of the School Standards and Organisation (Wales) Act 2013 and the Welsh in Education Strategic Plans and Assessing Demand for Welsh Medium Education (Wales) Regulations 2013, set out the statutory obligations for all local authorities to prepare, submit, publish and revise Welsh in Education Strategic Plans (WESPs).
144. The proposals for the under the proposed schemes in this report would be considered regulated alterations under the Schools Standards and Organisation (Wales) Act 2013. A local authority can make proposals to make regulated alterations and is required prior to publishing its proposals to undertake a consultation on those proposals in accordance with section 48 of that Act and the School Organisation Code. The recommendation seeks authority to carry out that statutory consultation. Any proposals must be the subject of full and fair consultation and due regard must be had by the Cabinet to the responses before a final decision is taken.

### **HR Implications**

145. The report proposes consultation on a number of proposals to support growth in ALN provision across Cardiff. Each individual consultation will include consideration of the Human Resources implications which will broadly be about supporting schools with growth, which will include

workforce planning and training. Trade union consultation will be required as part of that process.

## **Equality Impact Assessment**

A detailed equality impact assessment will be completed following consultation on any proposals.

### **RECOMMENDATIONS**

The Cabinet is recommended to:

1. Approve the Cardiff ALN strategic priorities, 2018-22:
  - Priority One: To improve outcomes for learners with additional needs by successfully implementing the ALN and Educational Tribunal Act
  - Priority Two: To improve outcomes for learners with additional needs by strengthening our collective capacity to meet all needs
  - Priority Three: To improve outcomes for learners with additional needs by ensuring sufficient, high quality additional learning provision
2. Authorise officers to consult on the following proposals:
  - a) To meet demand for primary and secondary special school places for learners with complex learning disabilities or autism spectrum conditions it is proposed to
    - increase the designated number of Ty Gwyn places to 198;
    - establish 3 extra classrooms by adapting the old Trelai Youth Centre building, which is situated to the rear of the school
  - b) To meet demand for primary and secondary special school places for learners with autism spectrum conditions it is proposed to:
    - extend the age range of The Hollies School from 4-11, to 4-14
    - increase the designated place number to 138
    - provide additional accommodation by refurbishment of the school accommodation to be vacated by Ysgol Glan Morfa
  - c) To meet the need for post-16 places for emotional health and wellbeing needs it is proposed to
    - extend the age range of Greenhill from 11-16 to 11-19 and
    - increase the capacity of the school to allow for up to 64 places.
  - d) To meet demand for primary special school places for complex learning disabilities, it is proposed to
    - change the designation of Meadowbank School from: 'specific language impairments', to: 'speech language and communication needs *and* complex learning disabilities'
  - e) To meet the need for early intervention places for speech and language needs, it is proposed to
    - Phase out the SRB at Allensbank School, closing the class in July 2020, or when all current pupils have completed their primary placement, if earlier.



- Open an 8-place early intervention class for children with speech and language needs at Allensbank School, admitting the first cohort in September 2019.
- f) To meet the demand for primary specialist resource base places for complex learning disabilities, it is proposed to
- open a specialist resource base (SRB) at St Mary the Virgin CiW Primary School, for up to 20 places.
- g) To meet the demand for primary SRB places for with complex learning disabilities and autism spectrum conditions in the Welsh medium sector, it is proposed to
- open a specialist resource base at Ysgol Pwll Coch, providing up to 10 places initially, but with scope to extend to 20 places in future, as demand grows.
- h) To meet the demand for secondary SRB places for complex learning disabilities and autism spectrum conditions in the Welsh medium sector it is proposed to:
- extend the designated number at Ysgol Glantaf specialist resource base to up to 30 places
  - extend and improve the current accommodation for the SRB
3. Note that officers will bring a report on the outcome of the consultation to a future meeting to seek authorisation as to whether to proceed to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013.

**NICK BATCHELAR**

Director  
12 January 2017

*The following appendices are attached:*

Appendix 1: Cardiff Additional Learning Needs Strategy 2018-22

Appendix 2: Report on Speech Language and Communication Support in Cardiff, 2017

Appendix 3: Letter from Chair of Scrutiny

**This document is available in Welsh / Mae'r ddogfen hon ar gael yn Gymraeg**