

Appendix 8

Formal Responses were received from the following:

Specialist Provision for Primary and Secondary Aged Learners with Emotional Health and Wellbeing Needs

- Estyn
- Albany Primary School Governing Body
- Baden Powell Primary School Governing Body and Headteacher
- Fairwater Primary School Headteacher
- Herbert Thompson Primary School Governing Body
- Lakeside Primary School Governing Body
- Springwood Primary School Governing Body
- Ysgol Gyfun Gymraeg Plasmawr Governing Body
- Ysgol Gyfun Gymraeg Plasmawr Headteacher
- Ysgol Gymraeg Pwll Coch Governing Body
- RhAG - Rhieni Dros Addysg Gymraeg (Parents for Welsh Medium Education)

Specialist Provision for Primary Aged Learners with Complex Learning Needs and / or Autism

- Estyn
- Albany Primary School Governing Body
- Coed Glas Primary School Governing Body
- Coed Glas Primary School Headteacher
- Greenway Primary School Governing Body and Headteacher
- Severn Primary School Governing Body and Headteacher

Formal Responses to the Consultation for Specialist Provision for Primary and Secondary Aged Learners with Emotional Health and Wellbeing Needs

Estyn - His Majesty's Inspectorate for Education and Training in Wales

Estyn's response to the proposal to introduce specialist provision for learners with emotional health and wellbeing needs in Baden Powell Primary, Fairwater Primary, Herbert Thompson Primary, Lakeside Primary, Springwood Primary, Ysgol Gymraeg Pwll Coch and, Ysgol Gyfun Gymraeg Plasmawr.

This report has been prepared by His 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.

The proposal is to establish specialist provision for learners with emotional health and wellbeing needs in 7 schools across the City of Cardiff. This includes six primary schools and one secondary school. This includes proposals for one Welsh medium primary school and one Welsh medium secondary school. Three schools [Lakeside Primary, Springwood Primary and Ysgol Gymraeg Pwll Coch] already already have a wellbeing class. The proposal for these schools is to replace the existing wellbeing class provision. The provision at Fairwater Primary school would be co-located with the new Court Special School.

Summary/Conclusion

Overall, Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area. However, further consideration needs to be given to the detail in establishing and running a specialist provision within a mainstream school and the implications on all learners, staff and their parents.

Description and benefits

The local authority has set out a clear rationale for its proposal. Essentially, this relates to increasing demand for specialist provision and better distribution of that provision within the City. However, the proposal does not provide information on the extent to which demand is increasing. The proposal refers to a lack of capacity in its special schools and the pressures in using out of county placements. However, it is

not clear how the use of out of county placements is directly relevant to the proposals.

The local authority states that it currently maintains 90 places for primary age learners and 284 places for secondary age learners with emotional health and wellbeing needs. This proposal is concerned with establishing an additional 64 places in six primary schools and 20 places in a Welsh medium secondary school. It is not clear why the demand for secondary age learners is so much greater than primary and whether the proposed increases in places for both primary and secondary learners are sufficient to meet demand.

The local authority provides an overview of the benefits of the proposal. These relate to the authority meeting demand, specialist staff working more closely with other colleagues in the authority and named special school, provision being potentially closer to home for learners, and, increasing provision through the medium of Welsh. However, no specific information is given in relation to the proposed benefits for learners, or what the curriculum or wider provision including support, is likely to be.

The local authority does not provide an overview of any alternative options that may have been considered.

The local authority provides an overall timeline for the proposal, with an expected implementation date of September 2024.

The proposal states that the specialist resource bases could reduce the distance travelled by learners. In relation to the geographical distribution of specialist provision the proposal [p.6] notes that "...although free home to school transport is available for such children... and goes on to state [p.9]...the council applies the two mile statutory qualifying walking distance to primary schools and 3 mile for secondary school, including special schools and specialist base facilities. Some learners who live within these distances may be provided with free transport..." These two statements may cause confusion. In addition, it is not clear from the proposal whether any learners in receipt of free home-to-school transport, will be disadvantaged by not being able to access pre and/or after school provision, particularly if the timing of the transport provision isn't flexible.

The proposal does not indicate whether pupils will be dislocated from existing mainstream or specialist provisions and the support, including transition arrangements, that pupils and their parents are likely to need and benefit from. The local authority does not provide information on costs in relation to establishing or replacing existing provision and neither does it consider whether there is the need for any building, refurbishment, or adaptation to proposed or existing provision. It is not clear that accommodation within the proposed schools has been identified.

The proposal does not provide information in relation to proposed staffing arrangements or how staff will be supported.

The local authority has not provided a Welsh Language Impact Assessment as part of this proposal. It is noted that specialist resource provision will be based in two

Welsh medium schools. However, it is not clear if the provision will be through the medium of Welsh.

The local authority has not provided a Community Impact Assessment as part of this proposal.

The local authority does state that the proposal is at "...an early stage..." [p.2] The council has a series of face-to-face and online consultation events taking place between 29th November 2023 to 16th January 2024.

Education aspects of the proposal

Overall, the local authority has not considered in any detail, other than those issues potentially related to location and transport, the likely impact of the proposals on learners, their parents or the proposed schools.

The proposal provides a high-level overview of the most recent inspection outcomes for the seven schools. However, it does not provide sufficient information on the commentary in relation to additional learning needs [ALN].

Overall, inspection findings in relation to progress of and provision for pupils with ALN is positive in nearly all of the schools being considered in the proposal. For example:

Baden Powell Primary 2017

- Provision and support for pupils with additional learning needs is effective.
- Most pupils with ALN make good progress in achieving their targets.
- Identification of pupils who need extra support takes part at an early stage.
- Procedures and relevant intervention programmes are in place to ensure that pupils receive the help they need.

Fairwater Primary school 2020

- Provision for pupils with additional learning needs is a strong feature of the school.
- The [wellbeing] centre provides specific and beneficial care, support and guidance for its pupils.
- Through a range of informative assessments and transition work staff get to know pupils' individual needs very quickly.
- All parents receive valuable daily communication about their child's progress and relevant areas for improvement. This well-organised and careful approach enables staff to monitor individuals very closely.

Herbert Thompson Primary school 2022

- The school provides tailored support, which enables many pupils, but particularly those with additional learning needs, to make good progress from their starting points.
- Pupils with additional learning needs, make strong progress in many areas of learning, particularly in developing their literacy and social and emotional skills.

- The school makes purposeful use of assessment procedures to track pupil progress as they move through the school.
- There are robust systems in place to identify, monitor, and review the progress of pupils with additional learning needs (ALN). There are regular
- and very effective pupil progress meetings that include leaders, class teachers and the Additional Learning Needs (ALN) co-ordinator.
- The Additional Learning Needs coordinator offers effective oversight and tightly coordinates the work of all staff.
- The clarity and detail of pupils' records is outstanding and ensures that all staff involved with supporting a pupil understand their role and meaningfully contribute towards their development.

Lakeside Primary School 2014

- There are no comments in relation to pupils with SEN/ALN

Springwood Primary School 2018

- The school was invited to prepare a case study on the impact of the its resource base for pupils with ALN.
- A particular strength of the school is the way in which all pupils show a high level of kindness and consideration for each other, for example through the support they give to other pupils with additional learning needs.
- The school's extensive provision of intervention programmes is very successful in meeting pupils' emotional, health and social needs.
- Excellent partnership between the leader of the resource base classes and the school's co-ordinator for additional learning needs.
- There are highly fluid arrangements between the resource base and mainstream classes.
- Nearly all pupils in mainstream classes support pupils from the resource class very well and are sensitive to their needs. For example, when older pupils from the resource base play football during play times, mainstream pupils slow play to encourage them to score and celebrate with them when they do.
- Pupils from the resource class profit from the wide range of opportunities to access mainstream classes and clubs. As a result of the very good integration of the majority of pupils and the high quality of provision within the resource class itself, these pupils make excellent progress towards their individual targets.
- The additional learning needs co-ordinator is highly effective in ensuring that pupils, parents, staff and other stakeholders collaborate effectively to provide specific, targeted plans and interventions.

Ysgol Gymraeg Pwll Coch 2018

- During their time at the school, most pupils, including those with additional learning needs make sound progress in their learning and achieve well.
- Provision for pupils with additional learning needs is effective.
- Procedures are thorough and enable staff to identify pupils' needs at an early stage and provide purposeful support.

- Individual education plans are detailed, include clear targets and are implemented effectively by teachers and assistants, which ensures that nearly all pupils make sound progress against their targets.
- Parents receive good information about their children's progress and are included fully in the process of creating and evaluating plans.

Ysgol Gyfun Gymraeg Plasmawr 2023

- In a majority of lessons, pupils, including those with additional learning needs (ALN), make sound progress in their subject knowledge and understanding.
- The ALN team has a thorough understanding of the needs of pupils with ALN and provides them with specific, beneficial support. They use a number of sources to review its provision for individual pupils regularly and adapt according to the pupil's needs.
- Leaders across the school provide high levels of support for staff and effective leadership in terms of provision for well-being and additional learning needs (ALN).
- Individual education plans provide detailed information about pupils' needs and include specific targets. There is a useful training programme of various strategies for teachers and assistants to support specific pupils in the classroom.
- In the 'ALN Support Hub', pupils of all ages work together effectively to develop their life skills successfully in a safe and stimulating environment. Pupils who attend the 'Well-being Class' receive purposeful support and feel safe. Here, pupils have access to varied and suitable provision to support them to deal with their emotions and cope with everyday life.

Albany Primary School Governing Body

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Yes.

Would you like to suggest any changes or alternatives?

The lack of EWB provision for primary aged pupils with emotional health and wellbeing needs in Cardiff continues to have a range of significant impacts on our school, including impacting how we use space in the school, impacting staff welfare and retention and impacting the wellbeing of pupils. An example would be a pupil waiting over two years for a placement which had an extremely significant impact on the child's wellbeing and wider family. We welcome the increase in provision – it is much needed and will help to ease pressures on schools such as ours. However we do not feel the provision will be sufficient for the numbers of children who need support across the city.

We also believe there will be risk of further increase in demand due to school budget pressures and the freeze on ALN funding and not being able to apply for additional funding leaving schools with lower levels of staffing to manage complex needs. We support proposals to improve facilities for prevention and early intervention in primary and secondary schools, including flexible spaces to allow for smaller classes and for setting up in-house nurture arrangements and internal exclusion.

Additional comments.

We believe it is fundamentally important that provision is fit for purpose for all pupils that need it. We have experienced a very concerning situation where a female pupil was not provided with a suitable placement for over two years, a key factor being that all of the provision explored by the council was focused on meeting the needs of boys. There needs to be planned provision for girls as part of this consultation – we would like to better understand how this will be addressed. For example, will some of the new Specialist Resource Bases be focused on meeting the needs of girls? How will you ensure that the new units accept a balanced proportion of girls as well as boys? With mental health challenges becoming more complex there are a significant number of girls with complex needs across the city and there needs to be sufficient provision not just in number of places but also for peers of the same gender. Many provisions explored by families are very boy dominated which can be intimidating for girls or parents when exploring provisions.

Cathy Madge

Chair of Albany Primary School Governing Body

Baden Powell Primary School - Governing Body

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Baden Powell Primary School

- *establish an 8 place specialist resource base for emotional health and wellbeing at Baden Powell Primary School from September 2024, within the existing buildings.*

Yes.

Would you like to suggest any changes or alternatives?

No.

Additional comments.

Baden Powell Primary has been well supported by the Local Authority in recent years to develop provision for pupils with additional learning needs. Since setting up the informal class, there has been a positive impact on pupils across the school, both in the wellbeing class and in the mainstream classes. Ongoing LA advice and guidance has upskilled staff to support pupils effectively. School staff are well trained in recognising what pupils need and delivering beneficial interventions to enable children to make good progress socially and academically. The Headteacher of Baden Powell Primary School has consulted with representatives of our school community including Staff, Governors, Parents and Pupils, and fully support the proposal to establish a formal 8 place specialist resource base for emotional health and wellbeing from September 2024, within our existing buildings.

Baden Powell Primary School - Headteacher

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Yes – support the following:

Baden Powell Primary School

- *establish an 8 place specialist resource base for emotional health and wellbeing at Baden Powell Primary School from September 2024, within the existing buildings.*

Fairwater Primary School

- *establish an 8 place specialist resource base for emotional health and wellbeing at Fairwater Primary School from September 2024, within the existing buildings. This would replace the existing wellbeing class.*

Lakeside Primary School

- *establish a 16 place specialist resource base for emotional health and wellbeing at Lakeside Primary School from September 2024, within the existing buildings. This would replace the existing wellbeing class.*

Springwood Primary School

- *establish an 8 place specialist resource base for emotional health and wellbeing at Springwood Primary School from September 2024, within the existing buildings. This would replace the existing wellbeing class.*

Ysgol Gymraeg Pwll Coch

- *establish an 8 place specialist resource base for emotional health and wellbeing at Ysgol Gymraeg Pwll Coch from September 2024 within the existing buildings. This would replace the existing wellbeing class.*

No opinion on the following:

Herbert Thompson Primary School

- *establish a 16 place specialist resource base for emotional health and wellbeing at Herbert Thompson Primary School from September 2024, within the existing buildings.*

Ysgol Gyfun Gymraeg Plasmawr

- *establish a 20-place Specialist Resource Base for learners with Emotional Health and Wellbeing Needs at Ysgol Gyfun Gymraeg Plasmawr from September 2024, within the existing school buildings.*

If you do or do not support the proposed changes than please explain why.

Baden Powell - We developed an 'in-house' well being class in response to pupil need in 2021. This has been successful in meeting the needs of our pupils, and has impacted positively on pupils both in the wellbeing class and in the mainstream classes.

Fairwater Primary School, Lakeside Primary School, Springwood Primary School, Ysgol Gymraeg Pwll Coch – This would replace the existing wellbeing class.

Would you like to suggest any changes or alternatives?

No, I agree with the proposed changes.

Additional comments.

Baden Powell Primary has been well supported by the Local Authority in recent years to develop provision for pupils with additional learning needs. Since setting up the informal class, there has been a positive impact on pupils across the school, both in the wellbeing class and in the mainstream classes. Ongoing LA advice and guidance has upskilled staff to support pupils effectively. School staff are well trained in recognising what pupils need and delivering beneficial interventions to enable children to make good progress socially and academically. As Headteacher of Baden Powell Primary School, I have consulted with representatives of our school community including Staff, Governors, Parents and Pupils, and fully support the proposal to establish a formal 8 place specialist resource base for emotional health and wellbeing from September 2024, within our existing buildings.

Fairwater Primary School Headteacher

In terms of the SRB it is very much welcomed by myself, I think this provision will afford more responsive needs of individual pupils being met. For example, I fully support that the pupils access the SRB for as long as they need to rather than following a time scale that was previously in place.

Fairwater Primary has a great deal of potential in terms of provision, and I do not feel that this is being fully maximised. I would welcome the Local Authority to invest more in our site/provision. Our current provision/ site does not have an outdoor secure space for the children to access. This would ensure further outdoor development opportunities it would safeguard our pupils. We also have an unused toilet block that I would welcome being turned into a sensory room for supporting the needs of the pupils - this would mean investment, again, from the Local Authority.

We have recently adjusted the setting so that we have two rooms available for the children to use. I ask as the Headteacher that we are afforded the opportunity by the Local Authority to recruit an additional staff member so that we can increase our pupil capacity. I would recommend funding for a HLTA so that greater impact can be achieved.

In response to the consultation, I do fully support the SRB development, however, I do recommend that further development is enabled at the SRB provision/site at Fairwater Primary School.

Thanks

Miss Ceri Evans
Pennaeth/ Headteacher
Ysgol Gynradd Y Tyllgoed/ Fairwater Primary School

Herbert Thompson Primary School Governing Body

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Herbert Thompson Primary School

- *establish a 16 place specialist resource base for emotional health and wellbeing at Herbert Thompson Primary School from September 2024, within the existing buildings.*

Yes.

If you do or do not support the proposed changes than please explain why

Response on behalf of the Full Governing Body of Herbert Thompson Primary School

We welcome the proposals to establish a specialist resource base at Herbert Thompson Primary School to service the needs of the Ely and Caerau children. We believe that this is a provision that is very much needed within this community.

We support the establishment of the specialist resource base within the existing school buildings but reiterate the findings of the initial survey of the site that the only suitable existing building would be the former boxing club building, but that this building will require extensive refurbishment to be a suitable space for the resource base.

Would you like to suggest any changes or alternatives?

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Additional comments

It is our hope that the specialist resource base will be fully resourced and sustainable to support the community for many years to come. We welcome the proposal that the resource base will have a phased recruitment of pupils to allow time for procedures within the base to be embedded.

We look forward to the ongoing support of the Local Authority to fully embed the specialist resource base within Herbert Thompson Primary School.

Steven Harris (on behalf of the Governing Body of Herbert Thompson).

Lakeside Primary School Governing Body

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Yes – support the proposals; support proposals relating to Lakeside Primary School with amendments.

If you do or do not support the proposed changes than please explain why.

Lakeside Governing Body supports the proposed changes in principle.

To clarify, pupils need to remain dual-registered throughout their time in the provision.

As part of the consultation process, the Governing Body attended a local authority consultation briefing and an on-site, face-to-face visit to the class followed by a presentation from the Wellbeing staff.

The governing body, leadership team and staff as a whole are fully committed to continuing the high-quality provision that currently characterises the wellbeing provision at the school. We are committed to ensuring that this continues assuming the transition to a formalised SRB provision takes place.

Current position

Excellent practice has been identified at the Lakeside Wellbeing Class Provision within the current staff to student structure (**ratio of 7 staff members to 12 pupils***). There have been a number of success stories since the class's creation, with some children returning to their mainstream settings and others effectively prepared for more specialised placements following a period of time with us.

- 2 X teachers with ALN allowance
- 1 X HLTA with ALN Allowance
- 4 X grade 4 TAs with ALN allowance

We consider that the classes at Lakeside represent an 'invest to save' where the intensive therapeutic provision has clearly demonstrated value for money and has enabled the children to engage much more effectively with learning given their complex starting points. We are sure that the council recognises that the provision of an SRB is founded on the belief that it is much more effective to intervene to meet the needs of these most vulnerable learners before their challenges increase significantly. If this is not done, the risk that more substantial and costly intervention will be needed in the future as these young people grow older is heightened.



Concerns around number of pupils rising to 16

To date, although the class has always (on paper) been allocated 16 pupils, we have never had that many. The highest number being 12 attending at one time (we have 14 on our books currently but only 12 attend).

The Wellbeing Class is specifically for children with emotional health and wellbeing needs. The school and the governing body have concerns about increasing the number of children attending the class, at the current high level of emotional, health and wellbeing needs that we are experiencing with our children and families, particularly since the Covid pandemic.

The following list summarises the challenges and risks of increasing the number of pupils. Please see the attached document, which provides further details.

If the Lakeside Wellbeing Class provision were to increase from 12 to 16 pupils, we risk the following issues arising:

Meeting the needs of EHWP pupils and fulfilling their IDPs (ALP) effectively

- There is considerable stability in the staffing of the provision which has contributed to excellent teamwork and a strong commitment to each and every child. We believe that this has been a critical factor in its success. It has led to the building of excellent relationships with the families of the children concerned. This has proved so important in underpinning the quality of relationships between staff and children which is such a strong characteristic of the provision as it currently stands.
- The current staffing complement (7) for 12 children is critical to allowing a high - quality provision to continue. All of the children in the provision require one to one

support during much of the day. This is because they need an adult to co-regulate with them and to keep themselves and others safe.

- Pupils need support to continue making progress in areas that are foundations for effective learning e.g., self-regulation, relationships and feeling safe in school. Pupils require a predictable educational environment that is underpinned by the principles of attachment and nurture.
- Key adults need to be emotionally and physically available, attentive and attuned to pupil's needs. Pupils require access to wider therapeutic support to enable them to process some of their experiences in a safe therapeutic space.
- Toileting needs - Intimate health and/or continence needs of children (for example, toileting support requires 2 staff members per child). The setting has one changing room equipped with a shower.

Space

- Physical space - Children in the setting find relationships with other children challenging and need space. Sometimes they are able to work/ play in twos, but rarely higher numbers. Staff model positive relationships between children. This often includes supporting distressed / dysregulated behaviour or interactions between children and helping them to return to their window of tolerance.
- Learning and therapeutic areas - The two classes are set up to allow rooms to be both therapeutic and learning environments with break out spaces and room for 1:1 sessions.
- Calming areas – we have two, beautiful, soft play rooms which are used for de-escalation / calming areas which are in constant use. Staff use these rooms to co-regulate with the children, usually on a 1:1 basis. These are also used to deliver 'relationship-based-play' activities and trauma informed therapeutic activities.
- Outdoor space – this is limited as a free flow activity on the decked area. There is one small climbing frame that around 2-3 children can use at once. Children are able to access the wider areas of outdoor space across the school, but this requires a high adult-pupil ration to be successful and keep everyone safe.

Logistics

- Transport - We do not have a dedicated taxi drop off area. A potentially unmanageable increase in practical logistics such as transport, transition within the school building (currently all 7 staff are placed in various positions according to our traffic management plan, to enable children to transition safely between classroom and taxis, e.g. gate duty, transitioning children from taxis into the building, etc)
- Multi-agency working eg visitor, meetings, conferences – to fully support children and families, there are a large number of meetings which are arranged by external parties and that take place within school hours. These always require attendance by one and sometimes two members of staff
- Paperwork, such as IDPs – all pupils in the setting have a large amount of detailed and individual information and legal paperwork, such as IDPs, PCP

meetings, Court documents and health care plans. These are high quality and need to be maintained on around a half termly basis, alongside yearly provision reviews and often, applications for future specialist provision.

Wider school involvement

The Wellbeing Class, families, children and staff, all form part of Lakeside Primary School and are part of everything we do. As a result, the class, with high numbers of multi-agency working, including safeguarding, health and safety, ALN needs and logistical daily planning, requires support and time from the senior leaders of the school, including the Headteacher and ALNCo. This would increase if the provision were to grow in number.

Funding

It was suggested at the consultation meeting that reduction in children could affect the level of funding that the class receives. Reducing the funding will obviously affect the staff>child ratio, the safety of the children, the traffic management plan, resources for the children, Health & Safety, and staff wellbeing. The current staffing complement for 12 children is critical to allowing this high -quality provision to continue.

We have identified significant risks with reducing the pupil to staff ratio and that these put at risk Cardiff's 2030 Learning Entitlement's Vision: specifically, it risks children's ability to "thrive and fulfil their potential" and "realise their dreams and ambitions"

We are keen to work together with the LA and other Wellbeing Classes / SRBs to make Cardiff a beacon of excellent practice for our emotional health and wellbeing children. We seek discussions around the points we have raised in order to get this right for our pupils across the city.

Would you like to suggest any changes or alternatives?

Changes to the proposed number of 16 down to 12 (with the current level of need), yet retaining the current funding levels.

If the Lakeside Wellbeing provision is to continue its excellent work and its current level of successful outcomes, the funding level must remain as it is currently. Such is the nature of the class that staff have to be ready at all times to deal with the unexpected (dysregulation, incontinence, safeguarding disclosure or discovery) alongside planning in the high level of correspondence, paperwork, meetings, logistics, and visitors/visits. At a higher pupil>staff ratio, we have concerns that there will be negative impacts on learning, pupil and staff wellbeing, Health & Safety, and positive outcomes.

Springwood Primary School Governing Body

May I, on behalf of governors at Springwood Primary School, confirm that we accept the proposals as outlined and discussed as part of the presentation. We understand all resources to run the Unit, will be provided from central budgets.

We have had a Wellbeing Class in our school for a number of years, and so the proposal does not mean a major change for us.

It is good to see lots of effort being put in to help and support those young children who need addition provision and congratulations for making this happen, despite pressure on budgets.

If you require anything further from me, then please don't hesitate to ask.

Derek King
(Chair of Governors).

Ysgol Gyfun Gymraeg Plasmawr Governing Body

The governing body of Ysgol Plasmawr appreciates the detailed presentation of information provided by the county regarding the establishment of an SRB at the school. We have always focused on ensuring we can provide for all students, whatever their needs, in a fully inclusive Welsh-medium environment at the school. We understand that this SRB will enable us to reduce the instances of pupils needing to move out of the Welsh-medium sector to access appropriate provision and welcome this.

Ysgol Gyfun Gymraeg Plasmawr Headteacher

Welsh medium schools provide for a fully comprehensive intake of pupils from all areas of Cardiff. With a diverse intake of pupils there will always be pupils who need additional support with their needs, including EHW needs, and the lack of provision for pupils that need more than is available in a mainstream setting has meant that these pupils currently need to leave the Welsh medium sector. We welcome this opportunity to provide for pupils with EHW pupils within the sector by establishing an SRB on the site of Ysgol Gyfun Gymraeg Plasmawr. This will allow us to respond to the needs of these pupils and ensure they have the opportunity to succeed in a Welsh medium environment. The layout of the school site will allow us to locate the provision for this small group of pupils in a manner that will not impact the provision to other pupils. The decision to locate the SRB at Ysgol Plasmawr builds on our longstanding work with EHW pupils and reflects the strengths in pastoral support noted in our recent Estyn inspection.

Ysgol Gymraeg Pwll Coch Governing Body

Pennaeth / Headteacher: Mr D Rees
Dirprwy Bennaeth / Deputy Headteacher: Mrs S Sampson
Cadeirydd y Llywodraethwyr/Chair of Governors: Mrs N Gruffudd-Evans

Ysgol Gymraeg Pwll Coch, Rhodfa Lawrenny, Lecwydd, Caerdydd. CF11 8BR
Ysgol Gymraeg Pwll Coch, Lawrenny Avenue, Leckwith, Cardiff. CF11 8BR



Teulu mawr ŷm ni i gyd

Ysgol Gymraeg Pwll Coch – Consultation Response

In 2022, the Governing Body and Headteacher agreed to open a Welsh-medium Wellbeing SRB at Ysgol Gymraeg Pwll Coch. We are proud of our inclusive ethos as a school, and when we agreed to open a temporary wellbeing class, we were keen to build on this success. We are also of the opinion that having such Welsh-medium provision in Cardiff is vital, and we were happy to support the LEA with the temporary plan.

However, despite the considerable efforts made by the Headteacher and staff in the SRB, the wellbeing provision is not working effectively and is now a serious cause for concern. These reasons have been presented by the Governing Body to LEA officers in a separate document.

After very careful consideration, it is with great regret that the Governing Body of Ysgol Gymraeg Pwll Coch has to make it clear that it cannot support the formalizing, or even the continuation of the Wellbeing SRB at the school. We are certain that the school and its staff have made every effort possible to ensure the success of the base over the past year. However, for the reasons included in the document, it is regrettable that it cannot become a permanent option.

We are grateful for the extensive discussions between the school and LEA, especially ALN and SOP officers, during the past two weeks. We note the council's acceptance of the Governing Body's decision that plans to establish a well-being class at the school cannot continue.

We look forward to working in close partnership for the benefit of all pupils in the future.

Yours faithfully,

Nona Gruffudd-Evans

Chair of Governors

On behalf of the Governing Body of Ysgol Gymraeg Pwll Coch

RhAG - Rhieni Dros Addysg Gymraeg (Parents for Welsh Medium Education)



Parents for Welsh Medium Education's (RhAG) response to

Cardiff City Council consultation

on the

**SPECIALIST PROVISION FOR PRIMARY AND
SECONDARY LEARNERS WITH EMOTIONAL HEALTH AND WELL-BEING
NEEDS**

18 January 2024

1. RhAG wishes to thank you for the opportunity to respond to this consultation by Cardiff City Council on the **SPECIALIST PROVISION FOR
PRIMARY AND SECONDARY LEARNERS WITH EMOTIONAL HEALTH
AND WELL-BEING NEEDS**
2. The Welsh language education planning system through the Welsh Language Strategic Plans in education has to be a core part of planning the wider education provision of all Local Authorities. Since September 2022, Cardiff County Council has been implementing a new scheme agreed by the Welsh Government.

Increasing opportunities for learners to be able to acquire the Welsh language so that they can use it freely is the basis of the Welsh Government's ambition to reach one million speakers and the Government's own Welsh language education planning document states

"Cymraeg 2050 is clear that Welsh-medium immersion - which is where the medium of teaching and learning is delivered wholly or predominantly through the medium of Welsh - is the most reliable model for creating Welsh speakers with the skills and confidence to use the language comfortably in their everyday lives."

(Page3: <https://www.gov.wales/sites/default/files/publications/2021-02/guidance-welsh-in-education-strategic-plan.pdf>)

3. Outcome 6 of the Welsh in Education Strategic Plans (WESP) places a responsibility on the Local Authorities to be increasing the provision of education for those learners with Additional Learning needs (ALN). The outcome states as follows:

Outcome 6: An increase in the provision of Welsh-medium education for pupils with additional learning needs ("ALN") in accordance with the duties specified by the Additional Learning Needs Act and the Education Tribunal (Wales) 2018

<https://www.gov.wales/sites/default/files/publications/2021-02/guidance-welsh-in-education-strategic-plan.pdf>

We would therefore expect that the provision proposed as part of this consultation is placed under the responsibility of Outcome 6 of the County's WESP.

4. It is therefore good to see that Welsh Language Education is addressed in this consultation and that new provision is proposed for Ysgol Pwll Coch and Ysgol Gyfun Plasmawr. This is a significant improvement on the very poor situation in the past as no such provision has existed for learners in Welsh language education before temporary classes opened.
5. This lack of coverage reflects in the provision, an all too common situation. In a joint paper between the Welsh Language Commissioner and the Children's Commissioner in 2023 entitled **Welsh in the Additional Learning Needs System** it was briefly stated at the outset of the document, the key points of the report, namely
 - ALN provision in Wales should reflect the needs of a bilingual country, and under the UN Convention on the Children's Rights (UNCRC) children have the right to receive education in their own language.
 - The evidence shows that there is a long way to go in order to secure a Welsh-medium ALN system. There are significant challenges, and we accept that it will not be easy to overcome them and it will not be possible to do so overnight.
 - It is essential that the Additional Learning Needs and Education Tribunal (Wales) Act 2018 is fully implemented to drive bespoke planning and action to ensure Welsh-medium ALN provision equal to English language provision.
 - To do this effectively, local authorities must fully review ALN provision through the medium of Welsh, taking into account the needs of Welsh speakers and the extent to which these needs are being met. The evidence suggests that this has not happened in all cases, and also therefore raises questions about planning processes for improving this provision.

6. In the considerations set out for Outcome 6 in the guideline for formulating the WESP, the following two questions were suggested:

How will you assess the size and capacity of the Welsh-medium Additional Learning Needs (ALN) workforce and use the results to plan the workforce in this sector?

and

Are you engaging with parents/carers to ensure they understand the provision and the support available through the medium of Welsh?

<https://www.gov.wales/sites/default/files/publications/2021-02/guidance-welsh-in-education-strategic-plan.pdf>

7. We would therefore have expected to see a reference to the content of the WESP which responds to the above two considerations for Outcome 6 within this consultation. But there were no details on the size and capacity of the ALN workforce or the element of contact with parents/carers. Being able to demonstrate a commitment to increasing workforce capacity at school and Authority level would have been suitable here.

9. On page 19 you note

The range of proposals focuses on supporting pupils in mainstream schools, where appropriate, and on the sustainable growth of established and successful specialist provision. This would reduce the Council's reliance on out-of-county and independent places in the coming years.

Although Welsh-medium provision already exists, is it fair to note that the provision is established and successful again after only a few months' provision?

10. You also state on the same page

The overall increase in provision, to align more closely with the projected need for places, would enable a larger number of learners to be placed in provision within or closer to their local community and reduce journey times.

This is a bit of a generalisation as this is not necessarily the case for Welsh language education learners as some may have to travel across the city from the east in order to reach Pwll Coch and Plasmawr Schools.

11. We wish to note our serious concern that the consultation continually states that "schools need to understand their responsibilities and that of the governing body" in maintaining the provision, but there is no information about how

prepared the schools are in practice or how the schools are going to acquire the expertise to be able to provide the specialist maintenance for these learners from the Local Authority. We would like answers to the following:

- What is the role of the Local Authority in this regard as they are responsible for this statutory area?
- What professional training do current staff need to be able to provide this specialist service?
- Is there a mapping exercise to show the range of training available in Welsh and the number of staff in school who have already received it or want the training. It would not be fair or legal to expect a school to start providing a specialist service like this without the expertise.

12. In the case of Ysgol Pwll Coch, we also note our concern that there is insufficient information in the consultation about the implications of placing 8 children within the 5-11 age range with intensive wellbeing and emotional needs within the same class.

- What is the appropriate staffing level for this?
- How many teachers will be in class with these learners so that the education suits the age and needs of the learners? There is no information about this in the document and it is information that should be available for parents and carers of school learners to consider before starting.
- How many specialist assistants will be in class?

13. In the case of Ysgol Plasnewydd will the 20 places be for ages 11-19? If so, the above questions and more come up again for this school?

- What is the appropriate staffing level for this?
- How many teachers will be in class with these learners so that the education suits the age and needs of the learners? There is no information about this in the document and it is information that should be available for parents and carers of school learners to consider before starting.
- How many specialist assistants will be in class?
- What will the provision look like from year 10 when the exam subjects are chosen by the learners? How will the support happen then?

14. There is a misconception in the last box on page 69 which states that Ysgol Gyfun Plasmawr falls under the category of Welsh community primary school.
15. You note about staffing costs with no sums in this consultation, but what about the specialist ongoing training costs and for the Welsh language sector? Has consideration been given to the need for training staff in Welsh-language schools where there is a need to consider the linguistic background of learners in supporting them in these provisions and the fact that the field is one with a shortage of specialist resources in Welsh?
16. While you note on page 82

The Council is monitoring demand for additional learning needs provision and preference patterns in Welsh language education provision at primary and secondary age, in order to put in place appropriate plans to meet any increase in demand.

it must be remembered that the WESP requirement now asks for Local Authorities to spur the demand for Welsh language education. As numbers in Welsh language education increase then more learners come to our schools with a wider range of needs. They must be ready from the outset to support them and not to respond to every request. To spur the demand the proposal for Welsh language education must become a real choice for parents by being able to see clearly what the offer is for their child – whatever the need. Detailing the range of support available to learners on websites, on school and Local Authority social media accounts while also detailing the nature and breadth of specialist training and support school staff receive from the Local Authority, is essential.

17. Compliance with Welsh Language Standards

This consultation is not an easy proposal to measure the impact on the Welsh language in terms of Welsh language standards as it includes proposals for Welsh and English medium schools. We understand the reasoning behind coupling the proposals in this way as it draws proposals similar in nature of provision together. However in doing so, it has taken one key thing for granted which is that provision is as well established in the Welsh schools as it is in the English schools.

We know that this is not the case from our work with outcome 6 of the Welsh Education Forum. And so, we would have liked to have seen an impact measure on the Welsh and English language school schemes separately because there are differences in the effects between the two.

We are not entirely convinced that you have complied with the Welsh Language Standards which should have received detailed consideration as part of this

consultation. We particularly note standards 91, 92 and 93 which are the standards relating to consultation.

91 Policy Making

When you publish a consultation document relating to a policy decision, that document must **consider and seek opinions regarding the effects** (whether those are positive or adverse) the policy decision under consideration will have on -

- (a) opportunities for people to use Welsh, and
- (b) not treat Welsh less favourably than English.

92 Policy Making

When you publish a consultation document relating to a policy decision, that document must **consider and seek opinions on how one might formulate or modify the policy under consideration** so that it would have positive or more positive effects on -

- (a) opportunities for people to use Welsh, and
- (b) not treat Welsh less favourably than English.

93 Policy Making

When you publish a consultation document relating to a policy decision, that document must **consider and seek opinions on how one might formulate or modify the policy under consideration** so that it would not have adverse effects, or so it would have less adverse effects on -

- (a) opportunities for people to use Welsh, and
- (b) not treat Welsh less favourably than English.

We recognise that there is a discussion of the effects on Welsh as part of the document on page 81 but we cannot see any discussion that would meet the above standards in the body of the consultation or in a related document. We did not see any link with a larger impact study on Welsh on the Council page. We apologise if there was another document and would be happy to be referred to that document.

We have identified the words in bold in the above standards which we think require further consideration namely **consider and seek opinions regarding the effects**. There was no opportunity to do this specifically, although there was room in the questionnaire to comment freely.

We would suggest that there are negative impacts and risks such as

- Learners having to travel farther than their nearest Welsh language school and therefore lose contact with friends if they had to move to the specialist class.

- Risk of moving into English education in the above connection and therefore potentially losing the Welsh language. This would have an impact on the WESP's targets and on the sustainability of the provision.
- Risk of a lack of specialist training in the wide range of areas in Welsh to be able to sustainably and effectively maintain provision.
- Risk of moving into English language education as a result of a lack of transport and therefore possibly losing the Welsh language. This would have an impact on the WESP's targets and on the sustainability of the provision.

We are asking the county to give detailed consideration to our response. There is not enough substance for us to be able to be confident with the proposals of this consultation as they stand without the additional details and confirmation of the questions asked above.

We will be ready to discuss our response with Cardiff County Council officers and councillors at any convenient time as always.

Elin Maher
Parents for Welsh Education
(RhAG)

Formal Responses to the Consultation on Specialist Provision for Primary Aged Learners with Complex Learning Needs and / or Autism

Estyn - His Majesty's Inspectorate for Education and Training in Wales

Estyn's response to the proposal to introduce specialist provision for learners with complex learning needs and/or autism at Coed Glas Primary School, Greenway Primary School and Severn Primary School.

This report has been prepared by His 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.

The proposal is to establish specialist provision for learners with complex learning needs and/or autism in three English medium primary schools in the City of Cardiff. In doing so the Council will increase provision by 60 places, distributed equally across the three schools.

Summary/Conclusion

Overall, Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area. However, further consideration needs to be given to clearly outlining the needs of the learners, the support they need and detail in establishing and running a specialist provision within a mainstream school and the implications on all learners, staff and their parents.

Description and benefits

The local authority has set out a generally clear rationale for its proposal. Essentially, this relates to increasing demand, a lack of current provision and better distribution of specialist provision for learners with complex learning needs and/or autism, across the City.

The proposal refers to a lack of capacity in its four special schools and nine specialist resource bases. It also notes that the rebuild and extension of Riverbank Special School will see capacity increase by just over 30 additional places. Table 4 of the proposal [p.14] clearly shows how demand for "specialist placements" has increased, year-on-year since 2017, with 24% more placements being made in 2022-2023 than in 2017. However, it is not clear if this relates specifically to learners with complex

learning needs and/or autism, or all learners with ALN in specialist resource bases, including special schools and education other than at school settings [EOTAS]. The proposal goes on to demonstrate that demand is likely to increase by a further 10%, up to 2028.

The proposal [p.15] states that "...growth trends cannot be modelled to continue indefinitely above 3.8% of the overall school population...it is not anticipated that such a high proportion of learners should be placed in specialist provision, such as special school, specialist resource bases and pupils referral units...Support in mainstream school should, where appropriate, all for learners to remain within their home school community. The Council is investigating opportunities to improve facilities for *prevention* and early intervention in primary and secondary schools. The broad sentiment about mainstream schools being supported to be better placed to meet the needs of learners with ALN is welcome. However, it is not clear how the authority will prevent learners having complex learning needs and/or autism.

The proposal suggests that nurture arrangements and internal exclusion are appropriate for learners with complex learning needs and/or autism. This is a worrying feature of this proposal.

The local authority provides an overview of the benefits of the proposal. This ostensibly relates to the authority meeting demand and better distribution of specialist ALN provision in mainstream schools and the potential for reduced travel time for learners to and from provision. However, no specific information is given in relation to the broader proposed benefits for learners, or what the curriculum or wider provision including support, is likely to be.

The local authority does not provide an overview of any alternative options that may have been considered.

The local authority provides an overall timeline for the proposal, with an expected implementation date of September 2024.

The proposal notes that the two-mile walking distance to school applies equally to special schools and specialist resource facilities. The proposal goes on to state that "...the individual needs of pupils at special schools and specialist resource bases...[may] limit the scope for high rates of active travel..." In other words, it may be possible for pupils that access the specialist resource bases to be provided with free home-to-school transport.

The proposal does not indicate whether pupils will be dislocated from existing mainstream or specialist provisions and the support, including transition arrangements, that pupils and their parents are likely to need and benefit from.

The local authority does not provide any information on costs in relation to establishing provision and neither does it consider whether there is the need for any building, refurbishment, or adaptation to proposed or existing provision. It is not clear that accommodation within the proposed schools has been identified. As a result, it is not possible to comment on the suitability of accommodation.

The proposal does not provide any information in relation to proposed staffing arrangements or how staff will be supported.

The local authority has not provided a Welsh Language Impact Assessment as part of this proposal.

The local authority has not provided a Community Impact Assessment as part of this proposal.

The local authority does state that the proposal is at "...an early stage..." [p.2] The council has a series of face-to-face and online consultation events taking place between 29th November 2023 to 16th January 2024.

Education aspects of the proposal

Overall, the local authority has not considered in any detail, the likely impact of the proposals on learners with ALN, their parents or the steps that need to be taken by proposed schools and the local authority is considering fully the needs of the learners that are likely to be placed in the specialist resource bases.

Up to page 19, the proposal refers to learners with complex learning needs and/or autism. It does not define what it means by complex learning needs, nor does it indicate the level of autism of learners. The teaching and learning section on page 20 potentially changes the needs of learners to "...complex learning needs (including autism) for learners with "severe general learning disabilities. Some pupils may have associate difficulties including autism, physical or medical needs, speech and language difficulties..." It may be that this section is attempting to refer to issues of co-morbidity. However, it could also be argued that the potential broadening of need may result in the inappropriate placement of learners with varied and contrasting needs. This would not generally be in the interests of learners. Overall, the needs of the learners is too vague, as is the very limited account of how their needs will be met.

The proposal is clear that all learners will have a statutory individual development plan. However, it is not stated whether this will be maintained by the local authority, or the school.

The proposal for each of three schools indicates that two classrooms would be set up to provide a nurturing environment, including a small group room with access to a secure outside learning area and accessible toilets. This is very limited information. It is not possible to comment on the suitability of the environment as no further information has been provided. It is not clear therefore that the needs of learners with complex learning needs and/or autism, or indeed those with physical or medical needs, have been considered.

The proposal outlines that a staggered approach is taken in admitting learners and that full capacity is not usually met within the first year of opening. This would appear to be a sensible approach and will allow both learners and staff to become acclimatised to the new setting.

The proposal does not provide any information on the curriculum to be followed by learners or whether it is expected that learners will access learning or other activities alongside their mainstream peers.

Children with complex learning needs and/or autism are generally more likely to be supported by other professionals such as colleagues from health. The proposal does not provide any information regarding any consideration given to making suitable space available for other professionals to meet with pupils their parents and school staff.

The proposal does not provide information on the qualifications or experience of staff to be employed at the specialist provisions. Neither does it provide information on how staff will benefit from links with other specialist provisions in the authority or any support to be provided by the authority's special schools or ALN advisory service.

The proposal is clear that the governance of the specialist provisions will be with the governing body of the schools. However, no information is provided on how the governing bodies, headteachers and senior leaders will be supported in planning and operating the provision effectively. It is presumed that the school's additional learning needs coordinators [ALNCos] will assume leadership responsibility for provision, but this is unstated. The proposal does not give consideration to the impact of this additional responsibility or, or to any professional development needs of the ALNCos.

The proposal does not provide any information on how existing staff and learners will be prepared for the introduction of specialist resource provision at their school.

Coed Glas Primary School currently hosts a specialist resource base for children with a hearing impairment. There are no proposed changes to that provision.

The school is currently operating under full capacity with the number of pupils on roll expected to fall in the coming years.

In its most recent "school building condition and suitability assessment" the Council determined that the school building condition was judged to be poor with major defects, and suitability was judged satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas. The proposal states that the site, and local infrastructure would support the development of a specialist resources base provision. However, the proposal does not provide any information on how it will overcome its school building condition and suitability assessment in respect of the specialist resource provision.

The proposal outlines an assessment of the Council's views on the quality and standards at the school. These are positive. There is a reference to our most recent inspection of the school in January 2023. However, the proposal does not make specific reference to our judgements on the provision for and progress of pupils with ALN. In [our report](#) we note that:

- The majority of pupils with additional learning needs [ALN] make good progress in their learning.

- Staff provide strong support for pupils with ALN. There are clear system for the identification for pupils needing additional support in learning, and provision is planned effectively to support them to make good progress in their skills.
- Pupils with hearing impairments are fully included in the life of the school. These pupils work with their peers in nearly all classes, while pupils in all classes learn British Sign Language to communicate with their friends.

Greenway Primary School

The school is currently operating at full capacity, with number on roll expected to fall over the coming years.

In its most recent “school building condition and suitability assessment” the Council determined that of school building condition was judged to be satisfactory but with minor deterioration, and suitability was judged satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas.

The proposal outlines an assessment of the Council’s views on the quality and standards at the school. These are positive. There is a reference to our most recent inspection of the school in October 2022. However, the proposal does not make specific reference to our judgements on the provision for and progress of pupils with ALN. In [our report](#) we note that:

- Pupils who have ALN make strong progress from their individual starting points
- Support staff work diligently to integrate pupils with ALN into the classroom and assist teachers well.
- There are robust processes in place to identify pupils with ALN using a wide range of evidence.
- The school’s ALNCo, along with class teachers, ensures that there is prompt identification of pupils with ALN and that suitable support is put in place.
- Staff work well with their local partner schools to take forward curriculum developments and approaches to support pupils with ALN.

Severn Primary School

The school is currently operating at around 90% capacity with numbers on roll expected to decrease over the coming years.

In its most recent “school building condition and suitability assessment” the Council determined that of school building condition was judged to be poor with major defects, and suitability was judged satisfactory. Performing as intended but does not effectively support the delivery of the curriculum in some areas.

During our recent inspection of the school we issued a health and safety letter, noting concerns around the roof and water ingress, including the potential of debris falling from the building. The Council has responded stating that they are fully aware of the condition of the building and that building leaks “...do not form an uncontrolled health

and safety risk. Where there have been leaks the incidents have either been risk assessed or services have been isolated and on-going control measures are in place to ensure safety of occupants...” The Council advises that it is “...currently undertaking envelope surveys in order to develop a programme of work which will be shared with the school as soon as possible...”

The proposal outlines an assessment of the Council’s views on the quality and standards at the school. These are positive. There is a reference to our most recent inspection of the school in October 2023. However, the proposal does not make specific reference to our judgements on the provision for and progress of pupils with ALN. In [our report](#) we note that:

- Pupils with ALN progress well in relation to their individual starting points
- The ALNCo efficiently organises and manages valuable support for pupils with ALN.
- There are clear structures and processes in place to identify, support and monitor the progress of these pupils.
- The school works well with external agencies to ensure that support for pupils meets their individual learning needs and enables them to make good progress.

Albany Primary School Governing Body

Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?

Yes.

Do you support the proposal for each of the school sites?

Yes.

Would you like to suggest any changes or alternatives to the proposed changes?

We support the proposed changes and believe any increase in provision is a positive thing. We are concerned however that it will still be insufficient to meet needs across the city. We have a significant number of pupils in our school that will require specialist provision and if the need is similar across the city more will be needed to be done so it would be interesting to know future plans.

Do you wish to make any additional comments?

Within the community our school is based in, there are a lot of pupils arriving from overseas. Often they have no identification or diagnosis of needs prior to arrival. They need enhanced support whilst working towards a specialist referral, which was previously available. We understand that there are processes and that evidence is needed before allocating specialist places but it is vital that there are reactive systems in place and the possibility of fast tracking some pupils where needs are clear.

Cathy Madge
Albany Primary School Chair of Governors

Coed Glas Primary School Governing Body



COED GLAS PRIMARY SCHOOL

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Headteacher: Mrs Sophie Notley

8.01.24

RE: Consultation to establish a 20 place specialist resource base for Complex Learning Needs and/or Autism at Coed Glas Primary School from September 2024, within the existing buildings.

Governor's response

It was considered that an SRB would be positive for the local community. Governors considered both options for either a Complex Learning Needs or an Autism base and believed that the right decision for Coed Glas Primary would be an Autism base. This is based on the school's successful record of integration with the children in the current SRB. It was considered that the school did not have the facilities for complex needs which would do a disservice to those children. It was acknowledged by the Governing Body that staff were aware of the positive and negative challenges, but morally considered it the right decision to have an additional SRB once the practicalities had been worked out.

Governors acknowledge that there are staffing challenges coming for September 2024 and opening an additional SRB would provide an opportunity to address those should current staff wish to apply for permanent positions within the base. The non-teacher representative on the Governing Body shared that the Teaching Assistant staff were concerned about losing jobs in September and considered that several members of current staff would be interested in applying for a role within a base.

Governors agree that an autism base would be a great opportunity and further enhance what Coed Glas already has to offer. It was acknowledged that it would mean so much more if Coed Glas pupils, who needed it, were considered a priority.

Reducing the PAN

Governors firmly believe that reducing the PAN to 60 is crucial to the success of a new base at Coed Glas and to the school community as a whole. The impact of very large class sizes on children cannot be underestimated. Several parent governors have had their own children in the situation of being in a very large class before the school was able to split into three classes. Without any spare classrooms, should an SRB be opened at Coed Glas, there is a real risk of class sizes increasing to

unmanageable levels. Continuing with a PAN of 75 alongside opening an additional SRB is not feasible.

Governors and SLT have discussed the impact of having a PAN of 75 has had during the last academic year. Alongside the significant budgetary pressures of splitting very large cohorts into three classes there is the impact on staff that has led to more than one resignation. Reducing pupil mobility would reduce staff workload. A PAN of 60 has to be seen as essential should an additional SRB be opened at Coed Glas.

Workload

The Governing Body expressed concerns over staff and Senior Leadership Team workload increasing with the additional SRB. They recognise that the very challenging behaviour of a small number of children over the past term has added significantly to the workload of SLT in particular. Governors are concerned about the pressure and workload on teachers and teaching assistants, particularly where year groups already have a higher number of children from our current SRB and children with ALN requiring ALP. Governors would want assurances from ALN panels that discussions with the school leadership team would happen before any child was admitted to a new SRB to ensure that there was capacity to support these children appropriately and not to the detriment of the other children.

They agree with the headteacher that any staff recruited to a new SRB would need to have the right skills and experience to ensure that additional pressure does not always fall on SLT. Governors will be very much part of the recruitment process. Governors would like current staff to have the opportunity to access relevant training over the coming terms.

Funding

Governors are very clear that sufficient funding needs to be in place to ensure that the SRB is appropriately resourced to meet the needs of the children joining and that repairs to the demountable classrooms are also funded.

Governors also discussed concerns over the size of the current staff car park. Whilst they acknowledge the desire to encourage more sustainable forms of school travel they totally understand that many of the staff do not live nearby and have to travel some distance to work. An additional 10 staff for the new SRB would put further pressure on this car park. Governors agree with the headteacher that expanding the car park into the school field to increase spaces by 10 would go some way to improve matters. Included in these 10 additional spaces should be another two disabled bays. Governors recognise that some of the potential children joining a new SRB would be arriving via taxi. With the current SRB pupils also arriving via taxi this would put additional pressure on spaces and would be a safety concern.

Governors are already aware and have met with Cardiff Council transport representatives regarding the consultation on changes to parking outside of Coed

Glas Primary. This will further reduce the opportunity for additional staff to park nearby.

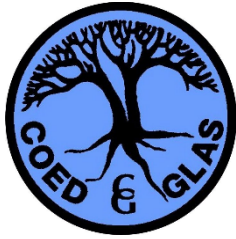
Governors discussed the concern over mainstream ALN funding being frozen. The Governors are very concerned about the impact this is having on children with IDPs requiring ALP who are in mainstream classes and the pressure this is putting on staff. Governors understand that the new SRB would be fully funded, however they wish to make their views clear about ALN funding. Governors recognise the difficulty this is putting on the school budget as these children are entitled to support. Funding for resources for the new SRB is vital. Governors have discussed the amount of £5000 shared at the consultation meeting. Governors recognise that this amount is insufficient to fund specialist resources and IT equipment for both the children, teachers and HLTAs in a new SRB. Due to Coed Glas deficit position any additional funding needed would have to come from Cardiff Council.

Staffing and budget

Coed Glas is one of many schools in a deficit position. This will have a significant impact on staffing levels next academic year. The Governors are very keen to retain as many staff as possible. There are a large number of temporary contracts due to budget restrictions and some members of staff have expressed a real interest and desire to work in a new SRB. Governors are interested in exploring recruitment to the new base for September 2024 so that any current staff who were successful at interview could avoid a break in service.

Kelvin Pritchard
Chair of Governors

Coed Glas Primary School Headteacher



COED GLAS PRIMARY SCHOOL

Ty Glas Avenue, Llanishen, Cardiff, CF14 5DW
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029 2075 4862



Headteacher: Mrs Sophie Notley

12.01.24

RE: Consultation to establish a 20 place specialist resource base for Complex Learning Needs and/or Autism at Coed Glas Primary School from September 2024, within the existing buildings.

Headteacher's response

We have considered both options for either a Complex Learning Needs or an Autism base and believe that the right decision for Coed Glas Primary would be an Autism base. We already have a successful model of inclusion with our current SRB and this model of integration works well for all of our pupils, staff and families.

Agreeing to establish an additional SRB at Coed Glas is fundamentally the right thing to do. We had a very successful Estyn inspection last January and Inspectors highlighted us as 'an exceptionally caring and inclusive primary school where all pupils are encouraged to succeed in all aspects of learning.' They also noted that 'all staff provide strong support for pupils with ALN.' That being said, adding to staff workload is a real concern and ensuring that any new SRB has staff who are appropriately trained, ratios that provide the right support and is fully funded is vital to its success. School staff are stretched to their limits at the moment particularly with the pressure of having children with IDPs that are not funded. My staff want to do the very best they can for these children as well as the mainstream children but with no money to provide additional support from adults this burden often lands on the class teacher and their support staff.

Staff concerns are around pupil dysregulation and additional workload for mainstream teachers. We already run our own wellbeing provision that caters for a range of needs alongside providing much needed support for a small number of children who display significant behavioural difficulties. Our capacity for coping with any more behavioural needs is stretched to breaking point. Again, the right recruitment to any new SRB is crucial. It is vital that staff have experience and training that includes de-escalation techniques and Thrive. For a new SRB to be successful at Coed Glas it is essential that any child joining us who requires greater levels of support on a regular basis is found a more suitable place or additional funding is provided to increase levels of staffing.

Staff brought up the difficult juxtaposition of an ALN system for mainstream pupils with IDPs which is woefully underfunded alongside a new SRB that would be fully funded. We currently have several children at Coed Glas in mainstream classes who may well have ended up permanently excluded from other schools and/or referred for specialist provision. The lack of funding to sufficiently staff support with appropriately trained adults for children with ALN is a huge worry. The wider picture of lack of funding for any child with ALN needs addressing.

That being said, one of the reasons we believe having an Autism base at Coed Glas is the right decision is the number of pupils, several in Early Years, who either have a diagnosis of Autism or are on the ND pathway who are really struggling in the mainstream environment. Some of these children could be high attaining with the right provision and we have requested specialist places for them. I know that these places do not currently exist and without schools agreeing to SRBs these children will continue to struggle, damaging their experience of education and potentially leading to them becoming anxious non-attenders later.

Having met with Springwood Primary headteacher and the lead teacher for their Autism base, it seems that having an Autism SRB that caters for children who have the potential to do well but need a resource base in order to succeed would be the right decision for Coed Glas.

Barriers and solutions

From a practical standpoint we have the space to establish an SRB as the birth rate continues to drop. Vital to the success of a new SRB would be a cap on our pupil numbers at 60 rather than our current 75. Once a new SRB opens we would not be able to split very large classes of over 35 into three as all available classrooms would be in use. Teaching more than 32 children in a class is unmanageable and not a good environment for any child to succeed. This is something our families and the Governing Body are firm about. In the last few years we have had to split two classes of over 34 children into three several times. This has had a significant impact on our budget. With our deficit position this is no longer an option for us. Continuing with a PAN of 75 would mean mixed year groups which is something we are not prepared to do. Our Estyn team was very pleased that we did not have mixed year groups. Our families and Governors are firmly against this too.

Whilst I know that reducing our PAN to 60 requires an additional consultation, we need assurance that admissions would not accept children beyond a cap of 60 into any year group of two classes prior to any consultation taking place. This is essential as we have lost excellent experienced staff due to excessively large class sizes in the very recent past. It puts a huge strain on class teachers in particular. Last year we admitted well over 60 new pupils outside of Reception and Nursery intakes. 10% of these children came with ALN requiring ALP (unfunded) and 50% with EAL. Because we have a PAN of 75 we continue to admit pupils mid-year on a very regular basis. Reducing our intake to 60 would reduce pupil mobility which also adds to staff workload. The impact of having pupils with ALN, EAL and challenging

behaviours in some classes has been significant. It would be essential that serious consideration would be given by the panel regarding year groups that already have a high number of children from our current SRB alongside higher numbers of children with IDPs requiring ALP in mainstream.

Staffing and budget

Coed Glas is one of several schools in a deficit position. This will have a significant impact on our staffing levels next academic year. I am very keen to retain as many staff as possible. We have excellent people who are experienced in working with children with a range of ALN. We have a large number of temporary contracts due to budget restrictions and it is highly likely that we will have to make some difficult staffing decisions in the coming school year to attempt to reduce our deficit. Some members of staff have expressed a real interest and desire to work in a new SRB. For me, recruitment is the key to the success of a new SRB at Coed Glas. Having experienced and passionate staff is crucial. I have met with HR to discuss current contracts and processes we would need to follow. Ideally if we could recruit to the new base before September 2024 with a view to staggered starts for the children joining then any of my current staff who were interested in applying and successful at interview could avoid a break in service. I would like to access Autism training for any of my staff who are interested in working in the base over the coming two terms.

Practical points – parking

Whilst I absolutely agree that local schools for local children is the right thing, I imagine that several of the 20 children potentially starting at Coed Glas Autism SRB would be travelling to school via taxis. As a number of our children with IDPs in mainstream classes alongside children arriving in taxis for our current SRB have disabled parking rights, the two disabled parking bays are always busy in the mornings particularly with parents dropping their children off. Our school car park is not large enough to cater for the number of staff cars and taxis at the moment. I have spoken with my health and safety officer on a number of occasions recently regarding cars entering and exiting the car park at the start of the school day. There is also consultation on changing the parking outside Coed Glas which would further impact the staff ability to park nearby. We have the space to expand our car park by 10 spaces which would provide additional disabled parking bays with increased numbers of children arriving in taxis and give some additional spaces for any new staff. The increase in both staff and taxi parking would be very difficult to manage. This may seem like a minor point however it has the potential to cause additional workload for SLT who would end up trying to manage parking pressures on a daily basis. Many of our staff live outside of Cardiff and need to drive to work.

Expanding our car park is essential and would need to be funded.

Funding to improve current buildings

Our demountable classrooms would be the ideal location for an Autism SRB as it would give those children a much needed quieter space away from the busy corridors and areas of the main school whilst still being nearby to access their mainstream classes. The demountable classrooms have their own garden area and would definitely help any children with Autism to manage their dysregulation. I believe the set up funding available is £5000 per classroom. This is not enough money to kit out a classroom with any specialist resources, such as sensory equipment, that would provide the right environment for children with Autism alongside your usual classroom resources. Additional funding would be required to provide enough IT equipment for the children and the adults working there. The teachers and HLTAs would need laptops. I have absolutely no money in my school budget to fund this. These classrooms are in need of some upgrades particularly the decked walkway and steps up to the demountable classrooms need some repair, as do the fire doors. Dean Griffiths came out to assess the buildings and saw the need to do some repairs whilst recognising that the classrooms were sound. Again, due to our deficit budget this would need to be funded.

Key points:

- Autism SRB
- Reduction in our PAN to 60
- Training for current staff
- Commitment to funding resources needed
- Funding to increase our car park size to include additional disabled bays
- Repairs to demountable classrooms funded
- Consideration on start date to ensure no break in service for any current staff
- Support with recruitment



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RE: ALN consultation response

19.1.24

Following on from a number of meetings and on behalf of the Governing Body at The Oaks Federation, we are pleased to offer our support for the proposed SRB provision at our school. We feel it will benefit our community to have the resources located at Greenway. The benefit will support learners, families and the current team to offer the very best for learners in Cardiff.

We only ask that the proposal is fully supported with appropriate funding and resources and that plans are communicated in a timely and efficient manner as the process develops.

With thanks

Nic Naish (Headteacher)
Bryan Jeffries (Chair of Governors)

**Severn Primary School Governing Body, Headteacher, Deputy Headteacher
and Additional Learning Needs Coordinator**



15th January 2024

To whom it may concern,

Detailed below is a response about how the proposed Special Resource Base (SRB) at Severn Primary School for complex learning needs and autism could be implemented effectively. The plans have been drawn up through consultation with the Severn Governing Body, the Additional Learning Needs Coordinator and the Severn Primary Senior Leadership Team.

As a school we fully support the proposal of an SRB at Severn due to the positive impact it will have on pupils and their families in accessing education and support which will meet their individual needs where mainstream education cannot. However, we want to ensure the SRB will be able to run effectively and safely alongside the current mainstream provision at Severn. Therefore, we have highlighted the benefits the SRB will bring to the school community but also the potential risks/concerns for both plans.

Plan 1

Use the whole upstairs of the main school building to house Year 6 and Year 5 and Year 4. This would create the necessary room for the SRB and allow a more flexible hall timetable for all year groups. It would also support Severn Care Club to increase in size and maintain a school library and community room for parental engagement activities and interventions for pupils.

Location and learning environment

- The SRB to be located in the current Year 3 classrooms. This is because both classrooms are situated in the heart of the school meaning pupils who access the SRB are at the centre of school life and feel included as part of Severn Primary School.

- Both classrooms are situated in the newest part of the building and therefore are in the best condition and have just recently had brand new flooring.
- Both classrooms have access to an enclosed outdoor space, nearby access to toilets for male and female and there is a room situated between both classrooms which could have a multi-purpose use, such as for changing, small group intervention, or sensory area.
- Both classes benefit from having a large store cupboard in each classroom
- Both classrooms are situated in close proximity to the main school hall which would enable pupils to more easily access assemblies and whole school events.
- There is an additional room nearby which is close to the toilets which could be used as a multi-purpose room, such as a shower/changing room for example

Plan 2

As above, but only using two classrooms and the main hall upstairs of the main school building to house the displaced classes.

Benefits and opportunities for the school

- Opportunities for pupils with complex needs to be supported in our cluster with education provision which meets their specific needs
- The SRB would further enhance Severn as an inclusive school community
- Pupils would have a personalised curriculum to help develop their skills
- Specialist teachers and teaching assistants on site to support other colleagues
- Parents would less anxious about sending their children to provision in a different part of the city.
- The SRB would offer a more inclusive approach for all stakeholders
- The school would receive additional funding to run the SRB
- There would be potential to increase the numbers of pupils who could attend Severn Care Club if the upstairs could be used to house classes. The current Reception classroom could become Severn Care Club. This would allow Nursery parents to use the provision in the morning which is not currently available. This could in turn increase numbers on roll for the school moving forward

Threats

Budget

- The school is currently running a large deficit budget for the first time this year. The ALNCO who was out of class full time now has a 2.5 day teaching commitment each week. As a result of this the ALNCO's workload is being absorbed by other senior leaders
- The threat of redundancy is extremely likely this year. This will impact negatively on the whole school in terms of losing staff.
- We understand we will receive funding to run the SRB which will be ringfenced. However, we have a number of questions about potential additional costs which the whole school budget might incur.
 1. Will the ratio of 1 teacher and two teaching assistants be sufficient as we do not currently know the specific needs of the pupils until they are allocated places? If the ratio is not sufficient and another member of staff is required, will this cost be covered by the SRB funding?
 2. If a member of staff is ill and cover is needed, will the SRB budget cover this? Will the school be able to use our Mutual Supply Fund to cover long term illness or will there be alternative arrangements?
 3. Will future pay rise costs be covered by the SRB budget so it doesn't impact on the school budget?
 4. Who will control the SRB budget? Will it be a separate budget or included as a cost centre in our main budget?
 5. Will there be a maintenance budget for the SRB classrooms and outdoor area?
 6. Will there a resource budget as part of the SRB budget? If additional specialist resources are required to support pupils, will this cost be met?
 7. Will there an additional funding to increase the leadership capacity/salaries. For example an assistant headteacher or a TLR for the lead SRB teacher.

School building

- The school building is in a poor state of repair. Half the school is currently clad in scaffolding in readiness for roof and stonework repairs. Severn is currently rated as a C. Category D schools are replaced. The school is in regular contact with Building Services to identify and plan future building works

- There are constant issues with drains, roof leaks and boilers/central heating. This eats into an already stretched budget and the time of senior leaders. Concerns regarding the roof were identified by Estyn during their inspection in early October 2023.
- The Estates Manager (EM) is retiring in August. We know it is proving difficult for many schools to attract and appoint candidates with suitable skills. Severn is a very large site and requires constant upkeep, maintenance and monitoring.
- The current KS2 pupil toilet block which SRB pupils would potentially use is very old and needs replacing
- Severn House (the EM's living accommodation) has now been vacated due to water ingress. Work is due to commence very soon on the property. This will impact negatively on access to the school building.
- As a result of the poor condition of the building, a lot of senior leaders' time is spent supporting meetings, working with the EM and keeping the building in working order on a daily basis.

Additional concerns

- Would the SRB be subject to our standard school policies? If this is the case, these would all need to be revised. Or, will specific policies be written relating to the SRB? Who will be responsible for writing these and will they need to be approved by the School's Governing Body?
- In addition to this, who will be responsible for writing risk assessments in relation to the SRB?
- The SRB will impact on daily school timetables and functions. For example, our playground areas are small and timetables would need to be staggered in order to accommodate playtimes, lunchtimes and access to these areas for lessons. This will mean less available time for the curriculum in these areas. Hence why, use of the upstairs of the school is vital (In particular the hall) to the success of the SRB and the school as a whole.
- Housing the SRB in any other location on the school site would be a short-term solution as evidence suggests pupil numbers will rise in the near future.

Overall, we are keen to support the proposal as we highlighted earlier in the letter. However, we do feel that the SRB would not function effectively unless it was located where the Year 3 classrooms currently are and that the school had access to the upstairs space in the main building.

Our school community is made up of a large percentage of pupils with English as a second language, free school meals and additional needs. In addition, many pupils start at Severn with low levels of literacy and numeracy skills compared to their peers:

“During their time at school, many pupils make good progress in most areas of learning, often from starting points that are below the level expected for their age. Around a half of pupils enter Reception with communication skills well below the level expected for their age”

Estyn October 2023.

A school library and community room are essential for helping pupils embrace a love of reading, receive bespoke literacy and numeracy intervention support and engage parents to buy into school life to support their child’s learning.

The school building also requires a lot of work in order to bring it up to standard to not only meet the demands of the SRB but the whole school community to provide the best possible learning environment for pupils and staff.

Yours sincerely

Mr Nick Wilson
Headteacher

Mr Andy Roberts
Chair of Governors

Mr Andrew Jones
Deputy Headteacher

Mrs Waj Bibi
Additional Learning Needs Coordinator

