

Appendix 3



Cardiff Council Statutory Screening Tool Guidance

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

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

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

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

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

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

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

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

Statutory Screening Tool

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

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

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

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

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

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

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

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

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

The consultation response

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Economic/Educational/Social

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

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

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

The following assessments to be undertaken:

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

Part 2: Strategic Environmental Assessment Screening

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

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

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

Part 3: Habitat Regulation Assessment (HRA)

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

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

Appendix 1 – Statutory Requirements

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

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

Initial Equality Impact Assessment
Corporate Assessment Template



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

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

It is proposed that:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3 Assess Impact on the Protected Characteristics

3.1 Age

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

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

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

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

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

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

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

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

3.2 Disability

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

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

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

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

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

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

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

3.3 Gender Reassignment

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

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

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

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

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

N/A

3.4. Marriage and Civil Partnership

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

	Yes	No	N/A
Marriage			X
Civil Partnership			X

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

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

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

N/A

3.5 Pregnancy and Maternity

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

	Yes	No	N/A
Pregnancy		X	
Maternity			X

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

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

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

3.6 Race

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

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

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

3.7 Religion, Belief or Non-Belief

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

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

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

3.8 Sex

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

	Yes	No	N/A
Men		X	
Women		X	

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

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

3.9 Sexual Orientation

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

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

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

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

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

3.10 Language

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

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

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

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

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

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

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

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

4. Consultation and Engagement

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

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

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

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

6. Further Action

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

7. Authorisation

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

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

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

Background

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

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

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

To request a copy of the assessment on the Strategic Framework please contact Clive Bailey, 029 2087 3166, CBailey@cardiff.gov.uk .

Proposal

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

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

Background

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

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

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

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

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

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

The consultation response

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

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

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

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

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

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

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

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

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

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

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

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

Reason for recommendation

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

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

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

Key:

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

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

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

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

Conclusion

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