

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

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

**AGENDA ITEM: 5**

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

**Reason for this Report**

1. To enable the Cabinet to consider a recommendation to hold public consultation on the proposed re-shaping of specialist provision in line with the falling demand for speech and language places, and increased demand for provision for children with behavioral social and emotional needs.

**Background**

2. 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.
3. 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.
4. 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.
5. Additionally, the County wide primary phase Welsh Immersion Unit is currently housed at Meadowbank and occupies three rooms. The close proximity to Ysgol Glan Ceubal has allowed for the arrangement to work well to date.
6. 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.

7. Cardiff also maintains a specialist resource base (SRB) at Allensbank Primary School, for 20 pupils with speech and language difficulties.
8. The speech and language therapy service provides school-based therapy to pupils in Meadowbank and Allensbank in line with their assessed level of need.
9. Admissions to Meadowbank and to Allensbank SRB are subject to a statement of special educational needs (SEN) and are managed by the local authority in accordance with the SEN Code of Practice for Wales 2002.
10. In line with equalities legislation and the statutory framework for SEN, children are only placed in a special school or SRB where this is
  - consistent with parents' wishes and
  - if there is substantial evidence to show that their needs cannot reasonably be met other than by placement in a specialised setting.
11. 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.

### **Changes in demand for special school and SRB places**

12. 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.
13. At the present time, November 2015, there are 23 pupils on roll at Meadowbank.
14. Demand for places at Allensbank has also fallen from 18 in 2010-11, to 11 pupils in November 2015.

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

|         | M'bank | Allensbank | total pupils |
|---------|--------|------------|--------------|
| 2010-11 | 40     | 18         | 58           |
| 2011-12 | 35     | 18         | 53           |
| 2012-13 | 34     | 13         | 47           |

|         |    |    |    |
|---------|----|----|----|
| 2013-14 | 32 | 16 | 48 |
| 2014-15 | 27 | 14 | 41 |
| Nov-15  | 23 | 11 | 34 |

15. The age profile across the two settings is heavily weighted to Key Stage 2. There were no new admissions to either school in September 2015.

*Age profile of pupils in speech and language provision*

|           | M'bank | A'bank | total |
|-----------|--------|--------|-------|
| Reception | 0      | 0      | 0     |
| Year 1    | 2      | 0      | 2     |
| year 2    | 4      | 4      | 8     |
| Year 3    | 3      | 2      | 5     |
| Year 4    | 2      | 2      | 4     |
| Year 5    | 6      | 3      | 9     |
| Year 6    | 6      | 0      | 6     |
|           | 23     | 11     | 34    |

16. As the therapy caseload has fallen, the therapy allocation to Meadowbank and Allensbank has been reduced and reallocated in order to provide more support for pupils in mainstream schools.

**Why has the need for special school and SRB places fallen?**

17. The trend does not arise from a reduction of need, but from changing expectations and from the availability of effective mainstream support.
18. The following factors are explored in more detail below:
- There is a national trend towards more inclusive educational practice;
  - A successful programme of early intervention and capacity building has been implemented in Cardiff's mainstream schools;
  - Between September 2014 and July 2015, the therapy service rolled out a school-based therapy service, in place of the clinic-based model;
  - Pupil outcomes for children with speech and language difficulties in mainstream are good.

**National trend for inclusion**

19. The trend is away from special school places for speech and language needs is part of a national trend towards inclusion.
20. The majority of children attending a special school now have severe and complex needs and are likely to benefit from a specialist education throughout their school life.
21. In contrast, children with speech and language difficulties have good prospects for succeeding in mainstream education provided they receive

effective specialist support when young. Increasingly, parents are expecting this support to be provided in a mainstream context.

22. Pupils who attend Meadowbank or the SRB typically transfer to mainstream secondary schools. It can be very challenging for pupils to transfer directly from a small special class, to a large mainstream secondary school in one step. The local authority undertook consultation with Meadowbank and Allensbank parents in 2012, to identify the best way of supporting transition to secondary school. There were two main outcomes from this consultation. The capacity of the Specialist teacher team was increased in order to provide more support for transition and for secondary pupils in mainstream; and both Allensbank and Meadowbank began working towards earlier reintegration to mainstream. Many pupils now have the chance to reintegrate to a local primary school, and to establish friendships there before transferring to secondary school.
23. In the past, a significant factor in the choice of the special school or the SRB was that these settings were the only schools where school-based therapy was provided, and where therapists and teachers worked closely together to provide support. Children who remained in their local mainstream school would be obliged to miss school on a regular basis and travel to a clinic to receive therapy. Direct contact between therapists and mainstream teaching staff was minimal.
24. With the roll out of a school-based therapy service in 2014-15, pupils included in mainstream are no longer disadvantaged in terms of access to therapy and there are additional benefits to remaining in the local school:
  - the child experiences fewer transitions;
  - local friendships;
  - good role models to support their speech and language development.

### **Early intervention and capacity building in Cardiff**

25. Since 2010, a successful programme of capacity building and early intervention has significantly improved the extent to which children with speech and language difficulties can be well-supported in their local mainstream school.
26. The specialist teacher speech and language team provides effective support, training and advice to mainstream schools, and provides direct teaching intervention to pupils with the most severe difficulties.
27. Using the 'Speech Links' and 'Language Links' programmes, primary schools assess the language development of all children entering Reception and use a range of strategies and interventions to address any language delays identified. This approach has been effective in improving the language skills of children by an average of 20 percentage points during the Reception year. The quality and timeliness of therapy

referrals has also improved, with a positive impact on reducing therapy waiting times (evidence from therapy service).

28. Speech and Language Links has been established in all but one primary school in Cardiff and is now being rolled out across secondary schools.
29. Joint working between the UHB and Education Service has improved efficiency and effectiveness of support for children with speech and language difficulties. Speech and language therapists work closely with the specialist teacher team to deliver the five step graduated response, with a single referral pathway and a shared caseload, this approach has led to less duplication and a more efficient and effective service. The partnership between health and education in Cardiff has been awarded an NHS prize for innovative practice.

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

30. In 2014 -15, the UHB established a school-based therapy service, with a range of benefits:
  - a. Children in mainstream are no longer disadvantaged in comparison to special school or SRB pupils, as they no longer have to travel to a clinic to access therapy;
  - b. School-based therapy is easier for families without their own transport and children do not miss school in order to attend the clinic;
  - c. There are stronger links between schools and therapy service, with therapists providing direct advice to class teachers and teaching assistants to enable them to deliver and oversee programmes.
31. The school-based service was rolled out in the Vale of Glamorgan a year earlier than in Cardiff. Data collected by the UHB demonstrates that the school-based service has led to fewer pupils being discharged early due to non-attendance at clinic. Early signs suggest that the same benefits are being realised in Cardiff.
32. A breakdown of the therapy caseload demonstrates that the majority of speech and language children are being supported in mainstream schools.

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

| <b>Therapy caseload,</b>      | <b>Meadowbank</b> | <b>Allensbank SRB</b> | <b>Mainstream</b> | <b>Total caseload</b> |
|-------------------------------|-------------------|-----------------------|-------------------|-----------------------|
| <b>Stage 5 (direct input)</b> | 7                 | 1                     | 48                | 56                    |
| <b>Stage 4 (direct input)</b> | 11                | 12                    | 188               | 211                   |

|                              |   |   |     |     |
|------------------------------|---|---|-----|-----|
| <b>Stage 3 (monitoring)</b>  | 7 | 2 | 249 | 258 |
| <b>Not requiring therapy</b> | 4 | 1 | N/A | N/A |

### Outcomes for pupils in mainstream

33. Pupils in mainstream are achieving their measurable targets. These targets are jointly set between education and health. Progress is also measured via the Speech and Language Link screening tools and school based attainment progress

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

| <b>Year</b>        | <b>2010- 2011</b> | <b>2011-2012</b> | <b>2012-2013</b> | <b>2013-2014</b> | <b>2014-2015</b> |
|--------------------|-------------------|------------------|------------------|------------------|------------------|
| <b>Pre Screen</b>  | 63.8%             | 57.2%            | 69%              | 63.8%            | 67.5%            |
| <b>Post Screen</b> | 84%               | 80.1%            | 83%              | 83.7%            | 84.9%            |

### Expanding need for special school and SRB provision for other areas of SEN

34. 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. A summary of the current priorities is attached to this report (Appendices 1 and 2).
35. 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.
36. 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.
37. Developing additional provision for pupils with behavioural emotional and social difficulties is therefore a current priority.

## **Proposal**

38. The following proposal to respond to the falling demand for speech and language places, and increased demand for provision for children with behavioral social and emotional needs has been identified:
- The phased closure of Meadowbank Special School (this would require the supported transition of current pupils to mainstream school or SRB with a strong package of support in line with their needs).
  - Increased capacity for mainstream support for children with speech and language needs.
  - A change in use of the Allensbank SRB to provide extra places for pupils with severe and complex learning difficulties.
  - An increase in the number of Nurture/ Revolving Door classes in mainstream schools across the city, to provide at least one setting in each of the six neighborhood areas, including a Welsh medium setting. (This development to include the existing classes at Springwood, Fairwater and Glan yr Afon, as well as new sites to be identified.) These classes would provide a network of early intervention support for children with attachment difficulties, social and emotional needs, and children who are socially vulnerable due to their speech and language needs.

## **Interim Arrangements**

39. Changes would be carefully planned in consultation with parents and professionals to take account of the needs of pupils attending each of the affected settings, to minimise disruption to their learning and to take full account of parental views.
40. The likely closure date for Meadowbank School would be August 2017. The majority of current pupils will have transferred to secondary school or reintegrated to a mainstream primary by that date. Remaining pupils would be offered a range of options, depending on their needs and on parent's views:
- Transfer to the SRB at Allensbank
  - A supported programme of reintegration to their local mainstream school. This would include funded additional support from an appropriately trained teaching assistant, school-based therapy if this continues to be an assessed need; support from the specialist teacher service.
41. The proposed change of use at Allensbank School would be timed to take account of the needs and ages of existing pupils. The classes would continue to operate as a speech and language specialist setting until these pupils complete their primary education and transfer to secondary school.

## **Educational Benefits**

42. The proposal would offer the following educational benefits:
- Continued high quality support for speech and language pupils in mainstream schools, with an extended specialist teacher team.
  - Reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream throughout their education.
  - Significant expansion of Nurture and Revolving Door classes for children with behavioural social and emotional difficulties.
  - Welsh medium specific provision for behavioural social and emotional difficulties.
  - Expansion of SRB places for children with severe learning difficulties.

## **Potential disadvantages of the proposal**

43. Pupils remaining in Meadowbank School at the time of closure would need to transfer to an alternative school, whether a supported return to mainstream, or a transfer to Allensbank SRB.

## **Alternatives considered**

44. The option of keeping Meadowbank open as a speech and language special school has been considered and rejected because the school roll has fallen consistently over the last five years and there is no expectation that the trend will reverse. This places the future of the school at risk even if no action is taken.

## **Future use of the Meadowbank School site**

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

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

46. It is anticipated that either of the options would have a beneficial impact on Welsh language. Both options would address the need for Welsh medium nurture or revolving door class provision.

## **Local Member consultation**

47. Local members have been appraised of the proposal to consult and will be included as part of any consultation undertaken along with all elected members in view of the provision at Meadowbank being city wide.

## **Reason for Recommendations**

48. To respond to the falling demand for special school places for primary aged pupils with speech and language difficulties, and to the need for



additional provision for children with behavioural emotional and social needs.

### **Financial Implications**

49. All Cardiff schools are funded from the delegated schools budget which is a ring fenced account that allocates funding to each school using the Formula Funding mechanism. The Formula funding mechanism is primarily based on a pupil number basis for Primary and Secondary schools and on a place basis for Special Schools and Specialist Resource Bases (SRB).
50. In this particular instance, the phased reduction of the number of places at the special school will result in a corresponding reduction in the amount of funding being provided to this school. The school is currently operating within its delegated budget and maintains a surplus balance despite falling number of places. However this may not continue to be the case should pupil numbers continue to fall. Using the revised number of places a financial profile of the school for the forthcoming medium term is required in order to establish whether or not the school will be in deficit at any point. In the event of the financial profile indicating a deficit then there will be a need to identify the source which will bridge the gap. Consideration also needs to be given to the governance arrangements of the school when financial viability becomes a clear risk.
51. The report identifies the need for some additional places in some SRBs and the funding for these will be found from the amount released from the reduction in places in Meadowbank School. There will also need to be consideration of any other financial impact on schools as a result of increasing capacity in order to ensure that schools are appropriately funded. This proposal is likely to generate savings for the delegated schools revenue budget but this cannot be effectively quantified at this stage and will need to be considered in detail.
52. Once identified, there will be a need for a future report which will outline the intentions of the site currently occupied by Meadowbank Special School in terms of potential capital receipt or alternative use.

### **Legal Implications**

53. The recommended consultation would have to comply with Part 3 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code.
54. Consultation gives rise to the legitimate expectation that the outcome of the consultation will be considered in terms of determining the way forward. Therefore consultation is required to be undertaken:
  - (i) when the proposals are at a formative stage (with no decision having been made);
  - (ii) on the basis that the consultation feedback will be properly considered and could change the proposals; and

- (iii) with the provision of sufficient information and time to facilitate expression of views by consultees and consideration of those views prior to making any decision on the proposals.
55. Following the outcome of the consultation further statutory notices may need to be published.

### **HR Implications**

56. A Human Resources Framework has been produced in consultation with key stakeholders including head teachers, governors, representatives of the diocesan authorities and the trade unions. It provides the basis for managing the human resources issues associated with School Organisation Planning and its purpose is to support governing bodies and staff working in schools, through a variety of strategies and with the ultimate aim of minimising compulsory redundancies across schools in Cardiff.
57. In the period leading up to the closure of a school, as pupil numbers reduce, the impact on the school budget and staff resources will need to be managed through the School's Redeployment and Redundancy Policy and Procedure, which has been developed in consultation with trade unions and key stakeholders. The Council will also support the Headteacher and governing body during this time, as they will need to ensure that staff continue to be supported and motivated during what may be a potentially difficult situation and the Headteacher is able to manage recruitment and retention of employees.
58. A key aspiration for the Council is to achieve staff reductions as far as possible through redeployment rather than voluntary redundancy or compulsory redundancy means. Therefore the Council is committed to maximising opportunities for school staff to secure employment in other schools in Cardiff and will facilitate a redeployment process.
59. Full support will be offered to the school staff and Governing Body of Meadowbank School by HR People Services throughout the reorganisation, this will involve attendance at consultation meetings, meetings with school staff where appropriate and the circulation of a Frequently Asked Questions document.

### **Statutory Screening Tool**

60. This is attached at Appendix 4 and included the Equality Impact Assessment and Strategic Environmental Assessment.

### **Equality Impact Assessment**

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

## **Sustainability Assessment**

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

## **Community Impact**

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

## **RECOMMENDATIONS**

The Cabinet is recommended to:

1. Authorise officers to consult on the proposal to remodel SEN provision specifically to respond to the falling demand for speech and language places and increased demand for provision of children with behavioural social and emotional needs through:

- The closure of Meadowbank Special School by August 2017.

This will be supported by the following proposed changes:-

- An Increase in the capacity for mainstream support for children with speech and language needs
  - A change in the use of the Allensbank SRB to provide additional places for pupils with severe and complex learning difficulties
  - An increase in the number of Nurture/Revolving Door classes in mainstream schools across the city
2. Note that prior to implementation of the proposal a further report will be provided to the Cabinet providing details of any objections received, the responses to those objections and recommendations for implementation or otherwise of the proposal.

## **NICK BATCHELAR**

Director

27 November 2015

*The following appendices are attached:*

Appendix 1 - Specialist Provision Review 2013, Overview and update of main issues, July 2015

Appendix 2 - Specialist Provision Review 2013  
Appendix 3- Provision for learners with social emotional and behavioural  
needs- Summary of stakeholder views  
Appendix 4 – Statutory Screening tool

**Specialist Provision Review 2013**  
**Overview and update of main issues**  
**EMT July 2015**

| <b>Red issues</b>   |
|---|
| <p><u>Speech Language and Communication</u><br/> Demand for speech and language special school and SRB places has fallen sharply since 2010, with the majority of SLCD pupils now included in mainstream.</p>   |
| <p><u>Primary provision for Behaviour Emotional Social Difficulties (BESD)</u><br/> The Court special school is currently over-subscribed, with up to 8 additional places required.<br/> The Court premises are not well-suited to educational purposes and there is no scope for extending the number of places in the current accommodation.<br/> Early intervention classes (Nurture and Revolving Door classes have been successful but there is insufficient capacity to meet needs.</p>   |
| <p><u>Secondary BESD</u><br/> Greenhill- insufficient places for current demand. Accommodation is in poor condition, not well-suited to purpose. 16 pupils in Independent or other LA schools due to lack of in-county places at significant additional cost to the local authority.<br/> Greenhill<br/> PRU requires new accommodation within the next 2 years, as the Mynachdy/ Bryn y Deryn site has been marked for redevelopment. Referrals have risen significantly and there is a need to consider additional PRU places.<br/> Few options for BESD girls.</p> |
| <b>Amber issues</b>   |
| <p><u>Provision for Complex Learning Difficulties</u><br/> Riverbank and Woodlands accommodation is overcrowded.<br/> Special school classes over-sized due to lack of space.<br/> A range of SRBs across the city provide an alternative to special school placement.<br/> Increasing incidence of complex learning needs , coupled with a growing population, will require additional SRB and/ or special school places to meet the rise in demand.</p>   |
| <p><u>Autism Spectrum Conditions (ASC)</u><br/> Incidence and identification of ASC continues to rise.<br/> No immediate issues identified in the review, largely because there has been a significant increase in provision over last 5 years: Marion Centre; Ty Gwyn; 3 new SRBs. These have absorbed the rise in demand, but are now full.<br/> In next 3-5 years, Cardiff will need either: a) significantly more capacity for mainstream inclusion; b) a further growth in SRB and special school places; or c) a combination of these approaches.</p>           |
| <p><u>Cardiff High SRB (for SPLD Dyslexia)</u><br/> The need for an SRB has diminished since delegation of SPLD funding to secondary schools.</p>   |
| <b>Green issues</b>   |
| <p><u>Physical medical needs (PMED)</u><br/> Growing number of children in mainstream schools with significant medical needs and/ or disabilities. The PMED classes at Hollies have now closed reflecting the fall in demand for special school places.<br/> Specialist teacher capacity to coordinate support in mainstream has been established from within existing resources. Better information and support for families and schools.<br/> Increased number of accessible schools achieved through SOP.</p>  |
| <p><u>Specific Learning Difficulties (i.e. dyslexia)</u><br/> Effective early intervention approaches established in primary.<br/> Successful delegation of specialist support to secondary schools.<br/> Number of statements has fallen sharply as a result.</p>  |

# **Review of Specialist Provision in Cardiff**

November 2013

| <b>Report Structure</b>  | <b>Page</b>  |
|--|--------------|
| <b>1. Background and Introduction</b>  | <b>3-4</b>   |
| 1.1 Purpose of this report   | 3            |
| 1.2 Background and history of the review   | 3            |
| 1.3 Conduct of the review 2010-11  | 4            |
| <b>2. Analysis of main challenges</b>  | <b>5-22</b>  |
| 2.1 Overview of review findings  | 5            |
| 2.2 Provision for pupils with Social Emotional Behavioural Difficulties (SEBD)   | 6            |
| 2.3 Provision for pupils with Severe Learning Difficulties (SLD)   | 10           |
| 2.4 Provision for pupils with Physical or Medical Needs, and Hearing, Visual and Multi-Sensory Impairments (PMED, VI, HI, MSI) | 14           |
| 2.5 Provision for pupils with Specific Speech Language and Communication Difficulties (SLCD)                                   | 16           |
| 2.6 Provision for pupils with complex needs in Welsh Medium sector   | 18           |
| 2.7 Provision for pupils with ASD  | 19           |
| 2.8 Secondary provision for pupils with Specific Learning Difficulties (SpLD) (i.e. dyslexia)                                  | 21           |
| <b>3. Summary of Challenges and Opportunities</b>  | <b>23</b>    |
| <b>Appendices: overview of data</b>  | <b>25-35</b> |
| 1. Cardiff and Out of County Provision, average place costs  | 25           |
| 2. Cardiff Special Schools, budgets and place costs  | 27           |
| 3. Cardiff Special school accommodation, health provision and transition issues  | 28           |
| 4. Specialist Resource Bases in Primary  | 30           |
| 5. Specialist Resource Bases in Secondary  | 33           |
| 6. Summary of actions undertaken since completion of the review in 2011.   | 35           |

## **1. Background and introduction**

### **1.1 Purpose of this report**

To report on the current range of special school and specialist resource base (SRB) places currently used to meet the needs of children with complex SEN, with particular emphasis on:

- Capacity and flexibility to meet current and future needs
- Opportunities to reduce places where there is a fall in demand
- Opportunities to re-invest in provision to meet areas of rising need and/or cost
- The extent to which accommodation is 'fit for purpose'
- The potential for reducing the use of Out of County placement

It is not the purpose of this report to make specific recommendations for action. Options for moving forward will be developed following further consultation with schools, parents, pupils and other partners. The intention is to provide sufficient information to inform these discussions.

### **1.2 Background and history of the review**

- In 2006 the Citywide Investment Plan for Cardiff Schools was focused on mainstream sufficiency and did not consider the needs of either the 7 special schools, 23 specialist resource bases or the PRU.
- The omission of special schools and SRBs has continued in later School Organisation Planning proposals and with hindsight, it is clear that this omission has led to missed opportunities. In the absence of a Strategy for Specialist Provision Development to guide and inform the process this has been unavoidable.
- During 2007-10, two significant discrete projects were taken forward; the rebuild of Ty Gwyn as a larger school on a different site and the Marion Centre was also developed in response to increased demands for Autism provision. Both of these developments have been successful in addressing some areas of increasing need, but the lack of a city-wide strategy means these projects have also highlighted the widening disparity in the quality of accommodation and resources between different areas of special school and SRB provision.
- In 2009, in response to the concerns of Special School Headteachers, the Chief Education Officer visited each school to collect Headteacher views about the key issues for special school development in Cardiff. The outcome of these conversations was an acknowledgement that specialist provision should be included in the School Organisation Planning Programme but that a shared vision and an agreed set of goals were needed to inform the process.
- In 2010 a review of specialist provision was initiated by the Education Service. The review considered the full range of specialist provision,



including the 7 special schools, 23 SRBs and the PRU, and the use of placements in other Local Authorities and the Independent Sector.

- The review was completed in 2011 and initial feedback was provided to the Special School Headteachers in February 2012. However, in the context of significant service re-structure, there was a delay in the process of reflecting on the review and developing a strategic plan.

### **1.3 Conduct of the Review**

The main activities of the review were carried out in 2010-11. The review was jointly overseen by Graham Dalton, School Organisation Planning Manager and Jennie Hughes, SEN Provision manager.

Health and Children's Services managers, parents and Headteachers were consulted during the process.

The review has been multi disciplinary and multi agency in scope, and considered buildings, facilities and access; data on current and projected pupil needs; multi agency support for complex needs where relevant.

Although there have been delays in bringing the issues forward for wider discussion, a range of issues have been taken forward in the intervening period (summarised in Appendix 6).

Pupil and financial data has been revisited in 2013 and updated to reflect the current position.

## Review of Specialist Provision in Cardiff, 2013

### 2. Analysis of main challenges

#### 2.1 Overview of review findings

##### **Special School Accommodation**

Accommodation at the 7 special schools varies from excellent to inadequate.

|             |  |
|-------------|--|
| Riverbank   | Significant over-crowding, inadequate facilities.                          |
| Woodlands   | Significant over-crowding, inadequate facilities.                          |
| Ty Gwyn     | High quality new build, with excellent facilities and capacity for growth. |
| Meadowbank  | Generally good   |
| The Hollies | Generally good   |
| The Court   | Inappropriate building, not fit for purpose                                |
| Greenhill   | Inappropriate building, not fit for purpose                                |

##### **Special school budgets**

The special schools vary in size and economy of scale, which also affects the average cost per pupil. (This is illustrated in Appendix 2.) The formulae and pupil descriptors which determine the place funding level for each school were set by the Welsh Office in the 1990s. It was agreed, with Special School Headteachers, that these are out of date and work has started to consider alternative approaches. However, in the current financial context this would merely result in a redistribution of funding between schools.

##### **Health provision**

Resources held by the UHB are limited with allocations often being based on historical models of need, rather than on current need.

Therapy and nursing provision is over-stretched in all settings, with the exception of speech therapy provision for Specific Language Impairment (Meadowbank and Allensbank). Currently in Greenhill and the Court schools there is no therapy provision even though a proportion of SEBD pupils are known to have unidentified speech and language needs.

The Local Authority funds some additional speech therapy provision, mainly for ASD SRBs and in cases where tribunal appeals have required it.

In 2010-11 the Health Board managers indicated a willingness to work with the Education Service to review health services across the special education sector.

Whilst in the current financial climate, a review would result in a redistribution of resources; the benefit of this would be that potentially a more needs and child focussed allocation could be achieved. Further work needs to be done in working towards more flexibility on the use of Health resources across the city and further exploration into the cost benefits of joint funding of health interventions to reduce the risk of the need for out of county placements.

## **Childrens Services**

Many pupils with complex SEN are also known to Childrens Services, either as children with disabilities or as children in need or at risk.

The scope for collaborative work to improve the quality of services for these children and to reduce risks needs to be further explored to inform a strategic response to the issues raised in this report.

Opportunities may include:

- Greater use of special school facilities for respite or 'wraparound' provision.
- 'Invest to save' projects to reduce the risk of children needing to go out of the authority to have their needs met.

## **Primary SRBs**

The review of the Primary SRBs has progressed with the findings having been shared with the relevant schools and are being addressed in partnership. Most of the issues will be resolved within existing resources, by phasing out some SRBs and reducing places in some areas of need, in order to increase provision in other areas. This work is summarised in Appendix 4.

## **Secondary SRBs**

The number of SRBs at secondary phase has been increased in the last three years to meet increasing demand in some areas of need. There are other areas where there is a need to reduce places, either in the SRBs, in the special schools or in both. These issues are outlined and included in the following sections.

## **Challenges and Opportunities**

The sections below provide a brief outline of the major challenges in relation to specialist provision, in the different areas of specialism and pupil needs, with an indication of some of the opportunities to release or re-organise resources.

The main activities of the review were carried out in 2010-11, with pupil and financial data revisited in 2013 and updated to reflect the current position.

## **2.2 Provision for pupils with Social Emotional Behavioural Difficulties (SEBD)**

### **Accommodation**

Both The Court and Greenhill special schools occupy unsuitable, inadequate buildings. The location of both schools would suggest that they would be of interest to developers.

The PRU operates over two main buildings, at Mynachdy and Howardian. The accommodation is generally adequate, but the future of both buildings is

under consideration as part of the council's goal to reduce the number of council premises across the city. Alternative accommodation will need to be identified.

**Pupil trends and demands: secondary**

Currently SEBD presents the most significant area of pressure in terms of requests for statutory assessment, placement and provision issues. There has been a 37% increase in referrals for statutory assessment in 2013-14 and an increasing number are for very young children, in the Foundation Phase of education.

There is no Cardiff provision for girls with high tariff needs. This is a difficult to provide for group for all local Authorities as the numbers tend to be very small. Typically there are 0 to 4 girls who require provision at KS3/4. The age range may be significant and it is challenging to maintain provision that may not be needed continuously. Appropriate Out of County provision is not always available therefore this presents Cardiff with a significant challenge.

There is no provision for SEBD pupils at post-16. Some pupils transfer to FE places or to work-based learning, but this is not suitable for all pupils. A number of Greenhill leavers are at high risk of becoming NEET.

Cardiff is currently funding 16 young people in Headlands or Moun-ton House. A redeveloped Greenhill with scope for girls and post 16 provision would help to negate these risks.

Comparison of current costs:

|                | <b>Average cost per pupil</b> | <b>Number of pupils</b> | <b>Total cost</b> |
|----------------|-------------------------------|-------------------------|-------------------|
| Greenhill      | £18,708.39                    | 56                      | £1,047,670        |
| Moun-ton House | £27,511                       | 5                       | £137,555          |
| Headlands      | £38,750                       | 11                      | £426,256          |

In addition, there are currently 30 LAC pupils, with primary need of SEBD, in Out of County specialist residential places, funded by Education, Childrens Services and Health. There may be scope for collaborative in-county solutions and early intervention to reduce out of county risks which should be explored.

LAC pupils in residential specialist settings:

| <b>LAC pupils in specialist residential settings (shared funding)</b> | <b>Education average cost per pupil</b> | <b>Total cost to Education</b> | <b>Typical cost per pupil to Childrens Services and Health</b> |
|---|---|--------------------------------|--|
| 30  | £25,995                                 | £779,842                       | £170,899   |

### **Pupil trends and demands: primary**

Pressures within the primary phase are similarly intense.

The Court is currently over number, and will need to limit the Revolving Door places to 4 during the next two terms (usually offer 8 places) in order to provide for additional long term placements.

The number of referrals for Revolving Door places at Glan yr Afon and The Court is currently twice as high as capacity. If no action is taken, this will lead to further requests for statutory assessment, increase the risk of exclusion and put further pressure on capacity for long term places. Whilst this position appears to be temporary, due to an unusually large cohort in Year 6, it should resolve next year in primary, but the 'bulge' in pupils will now begin to put further pressure on capacity at secondary phase.

Current places and costs:

|                                    | <b>Average cost per pupil</b> | <b>Number of pupils</b>          | <b>Total cost</b> |
|------------------------------------|-------------------------------|----------------------------------|-------------------|
| The Court                          | £20,515                       | 30 long term<br>8 revolving door | £779,590          |
| Fairwater SRB                      | £8,938                        | 10 long term                     | £89,380           |
| Glan yr Afon, Revolving Door class | £10,056                       | 8 revolving door                 | £80,450           |

### **Provision issues: Nurture Bases v. long term placements**

The review of 2010-11 identified a wide consensus that we should continue to move in the direction of early identification of SEBD in primary, with short term 'nurturing' provision focussed on building resilience for the child and sustained support and advice to the mainstream school.

This policy will increase the opportunities for young children to succeed in mainstream schools and has already reduced the demand for long term places. Further development of nurture group provision has the potential to further reduce statements and long term places in future.

Developments in Cardiff over the last 5 years illustrate this:

- Since 2008, 16 long term places for statemented pupils have been re-designated as short term 'Revolving Door' places for pupils at School Action+ (8 places at The Court and 8 places at Glan yr Afon SRB).
- The reduction in long term places has not been a problem as the demand for long term places fell at the same rate as the availability of RD places.
- The mainstream re-integration rate from Revolving Door is approximately 60%
- Most of the 40% of pupils who do not re-integrate have been placed under assessment and moved directly to appropriate long term

provision, without the experience of 'failure' and exclusion that can precede SEBD statutory assessment.

- The majority of RD pupils have been from KS2.
- The next step would be to establish full Nurture Group provision, which would offer 3-4 term placements for Foundation Phase pupils.
- In addition to the RD class, The Court also manages a re-integration programme for long term statemented pupils. This has enabled between 2 or 3 Year 6 pupils to transfer to secondary mainstream schools over the last three years. 4 pupils are expected to transfer to mainstream in September 2014.

### **Current position regarding nurture provision**

As described above, considerable work has already been achieved to shift the emphasis from long term SEBD places, to nurture or RD provision working within current resources. However, there are barriers to moving forward that will require some initial investment to resolve:

- For this early intervention policy to be fully effective there is a need to move beyond single term 'Revolving Door' places at KS2 to the full Nurture Group model which provides places for 3-4 terms for Foundation Phase pupils.
- Glan yr Afon is working towards this model during 2013-14
- Fairwater SRB is willing to move to Nurture group provision but there are 10 long term pupils with a wide range of ages in the SRB. It's unlikely that these pupils would be appropriate for nurture provision so this could block the development for the next 3-5 years.
- There are short term pressures on capacity in primary phase in 2013-14. A temporary solution is being explored but this would require funding for a temporary nurture/ RD class to manage current pressures.

### **SEBD challenges:**

1. Both special schools are operating in poor quality, inappropriate accommodation, with limited scope to expand places.
2. The PRU will require alternative accommodation within next few years.
3. There is a lack of provision for girls in KS3 and KS4.
4. There is no provision for post-16 pupils.
5. Early Intervention through RD or Nurture Provision has been successful within current constraints. Further development is hampered by the need to work within resources.

### **SEBD opportunities:**

1. Potential value of the special school sites.
2. Potential for reducing out of county spend and re-investing in Cardiff provision.
3. It is already clear that RD and/ or Nurture Group provision is a successful early intervention strategy that can reduce the demand for long term placements in Primary.

## **2.3 Provision for pupils with Severe Learning Difficulties (SLD)**

### **Accommodation**

There are significant overcrowding issues at both special schools.

At Riverbank there is a lack of non-teaching space; classrooms are small and overcrowded, designed for open plan team teaching. Toilet and changing facilities are inadequate for the needs of the pupils, 50% of whom have toileting/ changing needs.

At Woodlands there is severely limited outdoor space and the school relies on several demountables in poor condition.

There has been work on accommodation at many of the SRBs, although there remain some challenges to be addressed.

### **Pupil trends and implications for places: primary**

Prior to 2006 Cardiff funded a significant number of places in 'MLD Units' but demand had fallen significantly by this time. The greater capacity of mainstream schools to include learners with mild to moderate difficulties had led to a sharp fall in demand. In 2006 the number of funded places was reduced significantly, from 250 to 140 in primary, and MLD units were ceased altogether in secondary schools. Funding for MLD was delegated to schools with the result that the number of pupils requiring a statement for MLD has decreased significantly and continues to fall.

Riverbank, Woodlands and the remaining SRBs now focus on pupils with severe learning difficulties, many of whom have additional complex needs such as delayed speech, language and communication, physical or medical needs. As predicted in 2006, the demand for places has continued to fall, as the older 'MLD' pupils move on, but the needs of the younger population are significantly more complex.

In 2011 there were approximately 40 'empty places' per year in the primary SRBs, but the bases were finding the wide range of needs, with a mixture of SLD and ASD pupils placed together, very challenging. In 2013 the SRBs are being re-organised to eliminate empty places, create additional ASD provision and to reduce the range of need in a single SRB. The current plan is to reduce SRB places for SLD to 64 by September 2015 (there will need to be an increase in the number of ASD specific places to facilitate this).

Riverbank's numbers have remained stable at 70.

### **Pupil trends and implications for places: secondary**

Most of the MLD units in secondary schools were phased out in 2006, during the re-organisation of the primary units. Whitchurch SRB continues, with some post-16 classes at Cantonian.

The further fall in primary SLD demand is now being felt at secondary phase, where the number of 'empty places' is high. This can be seen in the tables below. Secondary places will need to be reduced by 30.

Demand for places in Whitchurch SRB has dropped significantly over the last two years.

Demand for Woodlands places has remained stable at 130 places.

Cantonian provides an SRB class for post-16 pupils with SLD. This class was originally established to provide for a 'bulge' year moving through secondary. It was anticipated this class would phase out by 2014, but this year it has been necessary to admit some pupils returning from an out of county setting. Like Whitchurch, the classes are not at full capacity.

### SLD places 2013-14, by NCY

| School              | R  | 1  | 2  | 3  | 4  | 5  | 6  | 7  | 8  | 9  | 10 | 11 | 12 | 13 | 14 | Total      | Empty places | Total places available |
|---------------------|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|------------|--------------|------------------------|
| (SLD pop only)      |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |            |              |                        |
| Bryn Hafod SRB      | 0  | 0  | 2  | 1  | 5  | 0  | 1  |    |    |    |    |    |    |    |    | 9          |              |                        |
| Llanedeyrn SRB      | 3  | 3  | 3  | 2  | 3  | 2  | 2  |    |    |    |    |    |    |    |    | 18         |              |                        |
| Llanishen Fach SRB  | 1  | 0  | 1  | 4  | 2  | 3  | 2  |    |    |    |    |    |    |    |    | 13         |              |                        |
| Trelai SRB          | 0  | 0  | 0  | 0  | 2  | 2  | 0  |    |    |    |    |    |    |    |    | 4          |              |                        |
| Windsor Clive SRB   | 0  | 0  | 2  | 3  | 3  | 2  | 1  |    |    |    |    |    |    |    |    | 11         |              |                        |
| Marlborough SRB     | 1  | 1  | 2  | 3  | 1  | 4  | 2  |    |    |    |    |    |    |    |    | 14         |              |                        |
| Riverbank           | 5  | 8  | 0  | 1  | 1  | 1  | 1  |    |    |    |    |    |    |    |    | 69         |              |                        |
|                     |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    | <b>138</b> |              |                        |
| Whitchurch SRB      |    |    |    |    |    |    |    | 4  | 5  | 10 | 10 | 9  | 11 | 2  |    | 51         | 19           | 70                     |
| Cantonian (SLD) SRB |    |    |    |    |    |    |    |    |    |    |    |    | 2  | 6  |    | 8          | 12           | 20                     |
| Woodlands High      |    |    |    |    |    |    |    | 14 | 19 | 20 | 17 | 11 | 14 | 19 | 8  | 132        | -2           | 130                    |
|                     |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    | <b>191</b> | <b>29</b>    | <b>220</b>             |
| Total population    | 10 | 12 | 20 | 27 | 27 | 23 | 19 | 18 | 24 | 30 | 27 | 20 | 27 | 27 | 18 | <b>329</b> |              |                        |

### Projected secondary demand 2014-19

| Secondary projections 2014-19 | Yr 7 | Yr 8 | Yr 9 | Yr 10 | Yr 11 | Yr 12 | Yr 13 | Yr 14 (w'lands only) | Total |
|-------------------------------|------|------|------|-------|-------|-------|-------|----------------------|-------|
| 2014-15                       | 19   | 18   | 24   | 30    | 27    | 20    | 27    | 19                   | 184   |
| 2015-16                       | 23   | 19   | 18   | 24    | 30    | 27    | 20    | 14                   | 175   |
| 2016-17                       | 27   | 23   | 19   | 18    | 24    | 30    | 27    | 11                   | 179   |



|         |    |    |    |    |    |    |    |    |     |
|---------|----|----|----|----|----|----|----|----|-----|
| 2017-18 | 27 | 27 | 23 | 19 | 18 | 24 | 30 | 17 | 185 |
| 2018-19 | 20 | 27 | 27 | 23 | 19 | 18 | 24 | 20 | 178 |

### Places and comparative costs, SLD

|                | Average cost per pupil | Number of pupils | Total cost |
|----------------|------------------------|------------------|------------|
| Primary SRB    | £9,254                 | 68               | £629,272   |
| Riverbank      | £14,744                | 70               | £1,032,120 |
| Whitchurch SRB | £10,357                | 51               | £528,230   |
| Cantonian SRB  | £16,981                | 8                | £135,854   |
| Woodlands      | £13,477                | 130              | £1,752,060 |

### 14-19 Opportunities

Woodlands has developed a range of accredited entry level courses and work-based learning opportunities for their pupils. It is difficult to provide the same range of opportunities in a mainstream setting, with smaller groups of pupils.

Cantonian SRB has worked closely with Woodlands to offer a similar range of opportunities. Collaboration between Whitchurch and Woodlands is less developed as the complex SLD population has only reached Y12 in 2013-14. There are a small but significant number of mainstream pupils who would also benefit from accessing this provision.

Further development of 14-19 pathways at Woodlands is hampered by the physical constraints and over-crowding.

### Parental choice, inclusion issues

Parental choice is the determining factor for most SLD placements. As a result, it should not be assumed that pupils in the SRBs are less complex than those in special schools.

Many parents prefer a special school setting for the secure environment, the opportunity for their child to be among peers with similar needs and the expertise offered by a special school. Many want this to be combined with inclusion opportunities and this can be achieved through partnership with mainstream schools, but can be resource intensive and complicated as it means transfer between sites.

Some parents want their child to learn in a mainstream environment and to have social and learning opportunities with mainstream peers. Obviously these parents also expect a secure environment and the benefits of specialist support.

The primary SRBs have varied in the extent to which they can include SRB pupils in mainstream lessons. The current work with primary SRB heads includes discussion about how a more consistent approach might be achieved in future, without the need for additional funding for each individual pupil.

At Whitchurch the opportunities for inclusion in mainstream classes are restricted as the school is over-subscribed. Adding an individual or small group of pupils to a mainstream class, with the SRB staff to support them, would not be realistic.

At Cantonian the level of mainstream integration is better, and is easier to achieve in a setting where mainstream admissions are below capacity.

### **Mainstream inclusion and implications for school performance data**

The effect of large groups of SLD pupils on Pupil Outcome data is an issue for secondary schools. SRB pupils cannot be excluded from the data and this can have a significant impact on end of year results.

### **Staff CPD in SRBs**

The review showed that it can be difficult to secure the necessary expertise, experience and CPD for special class staff in an SRB. Many teaching staff were originally teachers of 'MLD units' and have found the complex SLD population a challenge. Where schools may be facing staff reductions, they may not have the luxury of advertising and appointing experienced specialist staff when an SRB post becomes vacant: in some cases, mainstream teachers have taken on the role with minimal training or experience. Teachers in SRBs can also feel 'isolated' as their classroom practice may be radically different to that of their colleagues so there are fewer opportunities for peer support.

There is a need to develop common CPD opportunities across SRBs and special schools.

### **SLD challenges:**

1. Significant accommodation pressures at both special schools
2. Some accommodation issues in SRBs
3. Demand is falling overall. Place numbers are being reduced in primary, but will need to be reduced at secondary in the near future.
4. Parental expectations for both inclusion and specialism need to be borne in mind.
5. There are significant CPD challenges, particularly for the SRBs.  
Further development of Post 14 opportunities

### **SLD opportunities:**

1. The opportunity to reduce places at secondary level may release resources to resolve some of these challenges.
2. Opportunities for common CPD.

## **2.4 Provision for pupils with Physical or Medical Needs, and Hearing, Visual and Multi-Sensory Impairments (PMED, VI, HI, MSI)**

### **PMED and disability access**

#### **Special school places**

The majority of special school places are at Ty Gwyn. Two classes remain at The Hollies: historically these places have been regarded as more appropriate for 'higher functioning' pupils although there is an overlap with Ty Gwyn in practice. Classroom facilities at the Hollies are poor in comparison to Ty Gwyn, particularly the toilet facilities. There are on-site nursing and therapy services at The Hollies but these have been reduced in recent years.

#### **Pupils in mainstream**

There are growing numbers of children with physical and medical needs in mainstream schools. In most respects their needs are well met. However, there have been some issues in relation to effective forward planning for disability access.

Consultation with parents shows that lack of information has been a key issue. Many of our reasonably accessible primary schools feed secondaries with significant barriers to disability access. This can result in a child being unable to transfer to secondary with their friends or significant pressure to undertake significant building work in a short time scale. Although the LA is required to improve access across all schools, the statutory requirements allow for a strategic approach over time. School Organisation Planning is successfully improving disability access in many schools but better information needs to be made available about this aspect of the programme.

Parents have asked for better information about which schools are accessible; which schools will be improved in the next few years and which accessible primaries feed accessible secondaries. They have also asked for more transparency about the progress the LA is making in improving disability access across all schools.

Current Admissions and Transport policies can be barriers to a more strategic approach to disability access. Not all disabled children require a statement of SEN, and the current policy is to introduce IDPs in place of statements in Early Years. A number of children will need to be given priority for admission, or be provided with transport, so they can access a more accessible school, but current policies will only prioritise children with statements.

**PMED Challenges:**

1. Uneven special school facilities, including over-stretched health resources for this area of need.
2. Updating the strategy regarding disability access and providing better information for parents.

**PMED Opportunities:**

1. School Organisation Programme

**Hearing and Visual Impairments (HI/VI)**

There are well-established SRBs for HI pupils in both primary and secondary phases, at Coed Glas and Llanishen High.

There is no primary SRB for VI. The secondary SRB for VI was formerly at Llanedern High School. Purpose-built facilities have been included in the new build St Teilo's. However, the lack of an effective base for new Year 7 admissions for the last few years has resulted in the complex pupils being distributed across several local secondaries. This was anticipated. The SRB staff were incorporated into the central team and are providing an effective peripatetic service to support the local schools. There is a need to consider the future role and development of the SRB.

Provision for pre-school, mainstream and special school pupils with HI and VI are severely over-stretched as this is a growing area of need. Cardiff is also affected by high mobility rates, with significant numbers of EU arrivals with complex Sensory Impairments.

There is a statutory minimum qualification required for this area of work. In the absence of national training initiatives, the specialist teacher population is a 'mature population', with very few teachers under forty and very few teachers entering this field of specialism. Future staffing and retention issues need to be considered, as well as capacity, perhaps on a regional basis.

**HI/VI/MSI Challenges:**

1. Re-establishing an SRB for pupils with VI
2. Addressing the shortfall in support for pupils with sensory impairments in mainstream and special schools settings
3. Recruitment and retention issues

**HI/VI/MSI Opportunities:**

1. Purpose built accommodation for the VI SR at St Teilo's School

## **2.5 Provision for pupils with Specific Speech Language and Communication Difficulties (SLCD)**

### **Context: Improved capacity in mainstream schools and collaborative work therapy/ specialist teacher teams**

Over the last few years, Speech and Language Links have been rolled out in the majority of primary schools. Secondary Language Links is now being rolled out to Secondary Schools. Most schools now have at least one ELKLAN trained teacher and Teaching Assistant. As a result, mainstream schools have considerably more skill and capacity to address language delays, to identify specific difficulties early and to make good quality referrals for these children. They are also better equipped to implement the statements of children with more complex needs.

The specialist teacher service and speech and language therapy service have been collaborating on workloads for two-three years, in order to provide a more efficient and effective service, with less 'waste' and 'doubling up' of effort. The services have now established a single referral pathway that will further improve collaboration and efficiency.

This work at stages 1-4 of the 'pyramid of provision' constitutes a significantly stronger context for specialist provision.

### **Specialist provision: pupil needs and parental expectations**

Pupils with specific language impairments have good potential to re-integrate to a mainstream class, providing they are well supported and receive the early input they need. Consequently, specialist provision and speech and language therapy is mainly targeted at primary phase. The expectation is that the majority of pupils will make good progress and reintegrate fully to mainstream education by Year 7 or earlier.

The transition from a small class specialist setting at Allensbank SRB or Meadowbank Special School directly to a mainstream secondary school is challenging and has led to high parental anxiety about support in mainstream secondary.

### **Meadowbank and Allensbank**

Both settings have reduced in capacity over the last 6-7 years.

Places at Allensbank were reduced from 30 to 20 in 2007, due to a fall in demand. Places have been further reduced to 16 in 2013-14 as part of the Primary SRB review. A further fall in demand has made this possible, and the smaller class size will facilitate a stronger programme of mainstream reintegration during the primary phase.

Cardiff places at Meadowbank have remained stable at 30, but the school has been affected by the Vale's decision to phase out the ten places formerly funded by them. Vale policy is now to support all SLCD children in mainstream or SRBs. Two Vale pupils remain but will have left the school by September 2015.

Demand for specialist placement is expected to fall further, as the capacity of mainstream schools continues to improve, and as earlier reintegration to mainstream is achieved.

### **‘Virtual’ Secondary SRB**

Whitchurch SRB was originally funded to include pupils with SLCD, but it is no longer regarded as appropriate due to the difficulties providing mainstream integration opportunities, as described above. The shift in pupil needs towards SLD, rather than MLD, also makes the base inappropriate for pupils with specific language impairments.

Following consultation with parents in 2012, a ‘virtual’ resource base has been established for pupils from Meadowbank, and, where appropriate, from Allensbank. This model will ensure pupils continue to receive school based therapy if this is indicated, and will be supported by specialist teaching assistants. It will ‘follow the child’ to their local secondary school, rather than be established in any single school.

The ‘virtual base’ is in early stages of development but includes pupils at Cardiff High and Fitzalan, Llanishen and Cathays. These schools will not become permanent bases: if pupils move on they will no longer operate as part of the SRB partnership. Future pupils will not automatically be proposed to these schools but to the local secondary of their parents’ choice.

The goal is to build parental confidence in secondary mainstream placement, and to enable earlier reintegration to mainstream during the primary phase.

### **Places and comparative costs, SLCD**

|                | <b>Average cost per pupil</b> | <b>Number of pupils</b> | <b>Total cost</b> |
|----------------|-------------------------------|-------------------------|-------------------|
| Allensbank SRB | £9254                         | 16                      | £148,064          |
| Meadowbank     | £24,016                       | 32                      | £792,550          |
| ‘Virtual SRB’  | £11,513                       | 8                       | £92,110           |

### **SLCD Challenges**

1. Continuing to facilitate reintegration
2. Continuing to address the fall in demand for special class places

### **SLCD Opportunities**

1. Improved capacity to meet needs at stages 1-4
2. Improved collaboration between specialist teachers and therapy services.

## **2.6 Provision for pupils with complex needs in Welsh Medium sector**

A separate and intensive review of Welsh medium provision was carried out in 2010, which informed the full review of 2010-11.

### **Pupil trends**

There are very low numbers with complex needs in WM, which makes it impossible to provide the same range of options to English medium context. However, it is important to consider the needs of Welsh medium in every area of need, as an embedded practice, not an 'add on'.

The demand for WM mainstream is rising steadily, and there may be the need to consider Welsh medium special school places in future, perhaps on a regional basis.

A small number of Welsh first language children attend EM special schools. Although numbers are too low to provide a WM 'class', it is possible to provide a stronger Welsh language context through the deployment of Welsh speaking staff. At present there is no formal policy to promote this approach.

Most pupils with complex needs are included successfully in the mainstream Welsh medium schools, with support and advice from special school outreach or the specialist teacher teams.

### **Coed y Gof and Glantaf SRBs**

Both SRBs successfully support a wide range of needs.

The SRBs are in different clusters which can create transition difficulties for some pupils. Good collaboration and transition planning between the two schools usually succeeds in preventing and resolving any difficulties.

Physical space is limited in the primary SRB and there is currently no scope to extend in this location. Future investment in new WM schools may provide an opportunity to address both these issues by transferring the provision to purpose-built accommodation within the same transition cluster.

### **WM challenges:**

1. Limited space in the primary SRB
2. The SRBs are not in the same transition cluster
3. Monitoring demand for special school places and ensuring a range of options available: supported mainstream places; EM special school with Welsh language input; a special school class if there is sufficient demand.

### **WM Opportunities:**

1. School Organisation Programme

## **2.7 Provision for pupils with ASD**

### **Pupil demands**

In Cardiff there has been a significant rise in identified need in this area over the last 10 years. The numbers of pupils diagnosed with autism continues to increase, with the number of places in specialist provision being extended each year to meet the demand.

There has been significant investment in additional provision, partnership working and risk management so that ASD is no longer the most pressing area in terms of demand and out of county risks. However, the continued growth in this area needs to be planned and monitored carefully.

### **Extended SRB and special school places**

The development of the Marion Centre and extension of Ty Gwyn has resolved the over-dependence on places in the Vale special schools and assisted in managing the out of county risks associated with Ty Coryton. The establishment of a third secondary SRB at Llanishen in 2013 provides the required flexibility to meet the projected needs over the next 4-5 years.

### **Developments in the Vale**

Cardiff has reached agreement with the Vale regarding future placements in the new 'Super School' that will replace Ashgrove and Erw'r Delyn. Cardiff places have been falling gradually in recent years and are expected to stabilise at 40 places by 2016 if trends continue. However, the trends may change if parents begin to request the new school in preference to The Hollies or Ty Gwyn.

### **Primary places**

There is one ASD-specific primary SRB at Pentrebane. The Primary SRB review demonstrated the need for a second base, to avoid combining pupils with ASD and SLD in the same classes. This can be achieved within the existing primary SRB budget as there are two bases phasing out over the next two to three years, releasing the funding for a new base.

Many complex pupils are successfully included in primary mainstream, but then require an SRB to cope with the demands of secondary school.

The numbers with complex needs identified pre-school continues to grow, with additional places funded at the Hollies each year. The Hollies has reached capacity in terms of accommodation and will struggle to extend further.

### **Secondary places**

Places are extended each year at the Marion Centre, Ty Gwyn and in secondary SRBs. Reduced reliance on Ashgrove accounts for some of this growth, but increased levels of need is the key issue.

Currently there is a good range of provision at secondary phase, with capacity for growth to meet the rising numbers transferring from primary.



**Health provision**

The provision of speech and language therapy and occupational therapy for ASD pupils is over-stretched. A small but significant group of parents challenges this each year, often commissioning private reports to strengthen their case. The Local Authority can be vulnerable to SEN Tribunal appeals as the ultimate responsibility for ensuring children's therapy needs are met lies with Education. If provision cannot be secured from the UHB then the LA is obliged to commission additional therapy from the UHB or from private practitioners.

**ASD Challenges:**

1. Meeting the demand for additional primary special school places.
2. Monitoring and planning for future growth
3. Therapy provision.

**ASD Opportunities:**

1. Re-organisation of the Primary SRBs, releasing resources for a second ASD SRB.

## **2.8 Secondary provision for pupils with Specific Learning Difficulties (SpLD) (i.e. dyslexia)**

### **Secondary SRB for SpLD: historical context**

The SRB was established in the 1990s following a spate of successful tribunal appeals for private residential colleges for pupils with dyslexia.

At that time there was little expertise in mainstream schools to respond to dyslexia/ SpLD. This left the LA unable to defend the Tribunal appeals with a convincing package of support in our own schools.

The SRB was successful in attracting parents who might otherwise have lodged appeals. Pupils have made good progress at the SRB and it has set a high standard in support for this group of learners.

### **The Literacy Strategy and delegation of SpLD resources**

In recent years Cardiff has developed significant expertise in effective literacy interventions, and in understanding and supporting pupils with dyslexia/ SpLD. The Learning Intervention Team has provided specialist teaching input to pupils with statements, and training to mainstream schools to enable the development of focussed literacy interventions.

The reliance on statements of SEN to identify and meet needs, resulted in the Learning Intervention Team being increasingly tied to secondary aged pupils, restricting the scope for capacity building training programmes and for early intervention at primary phase.

In 2008 the Learning Intervention Team was therefore re-organised. Resources for specialist teaching were delegated to the secondary schools. All secondary schools now have qualified SpLD teachers to support pupils with dyslexia/ SpLD. This support is available without a statement.

As part of the Cardiff Literacy Strategy, the Learning Intervention Team re-focussed on training and capacity building at primary phase, with the goal of achieving functional literacy for all pupils by the end of Y6. This strategy is proving successful and the rate of functional literacy has improved each year.

### **Impact on the secondary SRB**

These developments have changed the context in which the SRB is functioning and raises questions about whether there will continue to be a need for the base in future years.

With all secondary schools resourced to provide specialist teaching and support to pupils with dyslexia, the reasons for SRB placement are increasingly linked to parental demand, rather than clear evidence of more complex need than pupils attending their local secondary school.

Since delegation, there has been an unanticipated difficulty when pupils reach the 'cease criteria' for the SRB. If transferred out of the base they will, as pupils from outside the natural catchment areas, impact unfairly on the Cardiff

High School's delegated SpLD resources. If maintained within the base, the pupils are receiving a 'gold standard' level of specialist support, despite having reached the cease criteria.

**SpLD Challenges:**

1. Monitoring the need for SRB places.

**Review of Specialist Provision in Cardiff, 2013**  
**3. Summary of Challenges and Opportunities**

|  |  |  |   |
|--|--|--|---|
| <p><b>SEBD challenges:</b></p> <ol style="list-style-type: none"> <li>1. The Court and Greenhill special schools are operating in poor quality, inappropriate accommodation, with limited scope to expand places.</li> <li>2. The PRU will require alternative accommodation within next few years.</li> <li>3. There is a lack of provision for girls in KS3 and KS4.</li> <li>4. There is no provision for post-16 pupils.</li> <li>5. Early Intervention through RD or Nurture Provision has been successful within current constraints. Further development is hampered by the need to work within resources.</li> </ol> | <p><b>SLD challenges:</b></p> <ol style="list-style-type: none"> <li>1. Significant accommodation pressures at both special schools</li> <li>2. Some accommodation issues in SRBs</li> <li>3. Demand is falling overall. Place numbers are being reduced in primary, but will need to be reduced at secondary in the near future.</li> <li>4. Parental expectations for both inclusion and specialism need to be borne in mind.</li> <li>5. There are significant CPD challenges, particularly for the SRBs.</li> <li>6. Further development of Post 14 opportunities</li> </ol> | <p><b>PMED Challenges:</b></p> <ol style="list-style-type: none"> <li>1. Uneven quality of special school facilities, including over-stretched health resources for this area of need.</li> <li>2. Updating the strategy regarding disability access and providing better information for parents.</li> </ol> <p><b>HI/VI/MSI Challenges:</b></p> <ol style="list-style-type: none"> <li>1. Re-establishing an SRB for pupils with VI</li> <li>2. Addressing the shortfall in support for pupils with sensory impairments in mainstream and special schools settings</li> <li>3. Recruitment and retention of specialist teachers</li> </ol> | <p><b>SLCD Challenges</b></p> <ol style="list-style-type: none"> <li>1. Continuing to facilitate reintegration</li> <li>2. Continuing to address the fall in demand for special class places</li> </ol> |
| <p><b>WM challenges:</b></p> <ol style="list-style-type: none"> <li>1. Limited space in the primary SRB</li> <li>2. The primary and secondary</li> </ol>   | <p><b>ASD Challenges:</b></p> <ol style="list-style-type: none"> <li>1. Meeting the demand for additional primary special school places.</li> </ol>  | <p><b>SpLD Challenges:</b></p> <ol style="list-style-type: none"> <li>1. Monitoring the need for SRB places.</li> </ol>  |   |

|   |  |  |  |
|---|--|--|--|
| <p>SRBs are not in the same transition cluster</p> <p><b>3.</b> Monitoring demand for special school places and ensuring a range of options available: supported mainstream places; EM special school with Welsh language input; a special school class if there is sufficient demand.</p>  | <p><b>2.</b> Monitoring and planning for future growth</p> <p><b>3.</b> Therapy provision.</p> |  |  |
| <p><b>Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Potential value of The Court and Greenhill special school sites.</li> <li>• Potential for reducing out of county spend and re-investing in Cardiff provision, especially in the area of SEBD provision.</li> <li>• Evidence that RD and/ or Nurture Group provision is a successful early intervention strategy.</li> <li>• Opportunity to reduce SLD places at secondary level.</li> <li>• Opportunities for common CPD across special schools and SRBs</li> <li>• School Organisation Programme</li> <li>• Purpose built accommodation for the VI SR at St Teilo's School</li> <li>• Improved capacity to meet needs at Stages 1-4, reducing the need for statements and Stage 5 provision for some areas of need.</li> <li>• Improved collaboration between speech and language specialist teachers and therapy services.</li> <li>• Re-organisation of the Primary SRBs, releasing resources for a second ASD SRB.</li> </ul> |  |  |  |

**Review of Specialist Provision in Cardiff, 2013  
Appendices**

**Appendix 1: Summary of placement costs, Cardiff and Out of County Provision**

|   |
|---|
| <b>Cardiff maintained specialist provision places</b> |
|---|

| Type of Provision                    | Cardiff funded places | Budget 2013-14 | Average cost per pupil | Range of per pupil costs |
|--------------------------------------|-----------------------|----------------|------------------------|--------------------------|
| 7 Cardiff maintained special schools | 541                   | £10,687,000    | £19,593                | £13,477- £24,141         |
| 23 Cardiff maintained SRBs           | 345                   | £4,413,121     | £12,792                | £9,254- £24,153          |
| Pupil Referral Unit                  | 44                    | £542,050       | £12,319                | N/A                      |

|   |
|---|
| <b>Specialist places in schools maintained by other Local Authorities</b> |
|---|

| Type of Provision            | Cardiff funded places | Total cost 2013-14 | Average cost per pupil | Notes  |
|------------------------------|-----------------------|--------------------|------------------------|--|
| Vale Special Schools         | 64                    | £1,882,400         | £28,631                | Shared use of these schools dates back to Local Government reorganisation.   |
| Mounton House Special School | 5                     | £137,555           | £27,511                | Pupils placed 2012-13 due to lack of scope to extend Greenhill places. These places also incur significant transport costs.      |
| Other                        | 17                    | £238,372           | £14,022                | LAC pupils fostered in other areas, or lack of in county provision.  |
|                              | 86                    | £2,252,827         | £29,196                | Although these placements are in LA schools, the average costs can be significantly higher than comparable provision in Cardiff. |

| <b>Specialist Places in the Independent sector</b>           |                              |                       |                               |   |
|--|------------------------------|-----------------------|-------------------------------|---|
| <b>Type of Provision</b>                                     | <b>Cardiff funded places</b> | <b>Budget 2013-14</b> | <b>Average cost per pupil</b> | <b>Notes</b>  |
| LAC: Independent Out of County                               | 33                           | £890,492              | £26,984                       | Pupils with high tariff needs requiring specialist residential places. Majority are SEBD or ASD.        |
| Non-LAC Independent special schools                          | 22                           | £1,070,899            | £48,677                       | Placement via Tribunal appeals or lack of in-county provision (e.g. Headlands)                          |
| Non-LAC Independent mainstream                               | 14                           | £156,389              | £11,170                       | E.g. funded places in Kings Monkton, Howell's or Cathedral Schools.                                     |
| Funded nursery settings                                      | 17                           | £17,385               | £1,022                        | N.B. These pupils transfer to maintained settings in reception.   |
| ABA Home Programmes  | 2                            | £30,735               | £15,367                       | Tribunal appeals.   |
| Tuition/ alternative education (pupils not on a school roll) | 8                            | £135,207              | £16,900                       | Reflects insufficient capacity to provide for pupils with high tariff SEBD particularly girls.          |
|  | 96                           | £2,301,107            | (Not meaningful)              | The first two groups represent the greatest opportunities for 'investing to save' in Cardiff provision. |

### **Comments**

Significant investment in some areas of Cardiff provision (Ty Gwyn and Marion Centre) in recent years has reduced the risk of Independent placement in some areas, notably ASD, PMLD and PMED.

The main opportunities to further reduce out of county spend and re-invest in Cardiff schools are in the area of SEBD.

## Appendix 2: Comparison of Cardiff special school places and per pupils costs

| School      | Age range | Primary Need | Av. place funding per pupil | No. of places 2013-14 | Total pupil based funding | Formula funding other | Total budget 2013-12 | Total per pupil cost |
|-------------|-----------|--------------|-----------------------------|-----------------------|---------------------------|-----------------------|----------------------|----------------------|
| Ty Gwyn     | (3-19)    | PMLD<br>ASD  | £16,462.00                  | 131                   | £2,160,640.00             | £954,220.00           | £3,114,860.00        | £23,732.27           |
| Woodlands   | (11-19)   | SLD          | £9,000.00                   | 130                   | £1,169,960.00             | £582,100.00           | £1,752,060.00        | £13,477.38           |
| Riverbank   | (4-11)    | SLD          | £9,408.00                   | 70                    | £658,530.00               | £373,590.00           | £1,032,120.00        | £14,744.57           |
| Meadowbank  | (4-11)    | SLCD         | £12,462.00                  | 33                    | £409,130.00               | £383,420.00           | £792,550.00          | £24,016.67           |
| The Hollies | (4-11)    | ASD<br>PMED  | £16,112.00                  | 83                    | £1,329,270.00             | £608,840.00           | £1,938,110.00        | £23,350.72           |
| The Court   | (4-11)    | SEBD         | £11,929.00                  | 38                    | £453,310.00               | £326,280.00           | £779,590.00          | £20,515.53           |
| Greenhill   | (11-16)   | SEBD         | £12,381.00                  | 56                    | £693,360.00               | £354,310.00           | £1,047,670.00        | £18,708.39           |
|             |           |              |                             | 541                   |                           |                       | £10,456,960.00       |                      |



### Appendix 3: Special school accommodation, provision and transition issues

| School      | Accommodation  | Health Services  | Transition   | Other  |
|-------------|--|--|--|--|
| Ty Gwyn     | High quality, purpose built accommodation  | Specialist nursing, OT, physio and SLT on-site provision.  | Provides across 3-19 age range. Also provides a secondary transition for some Hollies pupils.  | Scope for out of school hours provision in partnership with Children Services and health   |
| Woodlands   | Severely limited outdoor space. Several demountables in poor condition.  | Liaison with OT, physio. Half day consultative service from SLT.                                 | Admits pupils from Riverbank, primary SRBs and mainstream.   | Scope to further develop post-16 provision for pupils from across the city, but accommodation prevents this.   |
| Riverbank   | Severe over-crowding in classrooms. Lack of non-teaching space.  | Liaison with OT, physio. Half day consultative service from SLT.                                 | Pupils usually transfer to Woodlands.  |  |
| Meadowbank  | Some small classrooms but generally a high standard of accommodation, with many specialist curriculum areas and non-teaching spaces. | On-site speech and language therapy service.   | Pupils used to transfer to Whitchurch: this became an issue due to lack of integration opportunities. Following consultation with parents in 2012, the LA has developed the concept of a 'virtual SRB' to resolve this.  | Transition from a small special school to mainstream secondary is extremely challenging. It results in very high expectations from parents re support levels, and pupils who are highly vulnerable socially. |
| The Hollies | Generally good quality of accommodation for ASD. Very poor quality toilet and specialist facilities for PMED.                        | Specialist nursing, OT, physio and SLT on-site provision. However, this is being reduced by UHB. | Historically, most Hollies pupils have transferred to vale specials schools: Ashgrove for ASD and Erw'r Delyn for PMED. Crisis re lack of spaces at Ashgrove was a driver for development of Ty Gwyn ASD provision and for the Marion Centre. Vale schools continue to be an option, but | The PMED provision at Hollies is small and facilities are poor.  |

|           |  |  |   |  |
|-----------|--|--|---|--|
|           |  |  | Cardiff is less dependent on this provision than formerly.  |  |
| The Court | Generally agreed that the school accommodation is not 'fit for purpose'. | Liaison with CAMHS. No speech and language or other provision. | Pupils transfer to Greenhill or to mainstream with support. The school runs a re-integration class to support re-integration prior to secondary.  | 8 of the 35 places are used for revolving door places for KS2 pupils at SA+.   |
| Greenhill | Generally agreed that the school accommodation is not 'fit for purpose'. | Liaison with CAMHS. No speech and language or other provision. | Pupils transfer from The Court, or from mainstream secondary, following place breakdown, often mid-year. Pupils move on to college or work-based learning. Some pupils with significant learning difficulties are unable to access these options. | Accommodation limits scope for further development of the school. The school has the expertise to develop provision for girls, post-16 provision, and high tariff pupils at risk of becoming looked after. Lack of provision in these areas results in rising out of county costs. |

#### Appendix 4: Specialist Resource Bases in Primary

The review of 2011 has resulted in a set of broadly agreed priorities and actions that have been discussed and agreed with the Primary SRB Headteachers and some actions are underway to resolve some of these issues. The range of provision is summarised below, followed by a summary of the main issues and actions required, or already in train, to resolve these.

#### Specialist Resource Bases in mainstream primary schools

| Schools                       | Phase             | Range of needs   | Number of places<br><i>(NB this is the agreed standard number: several bases are currently over number)</i> | Cost per place |
|-------------------------------|-------------------|--|---|----------------|
| Bryn Hafod Primary School     | Primary<br>(4-11) | SLD<br><br>Many pupils also have related needs such as delayed development of language and communication; emotional, medical or sensory needs. | 8 (Proposed increase to 16 from September 2014)   | £10,182        |
| Llanederyn Primary School     |                   |  | 16  | £9,254         |
| Llanishen Fach Primary School |                   |  | 16  | £9,254         |
| Marlborough Primary School    |                   |  | 16  | £9,254         |
| Trelai Primary School         |                   |  | Phased closure: no further admissions   | £14,406        |
| Windsor Clive Primary School  |                   |  | Phased closure: no further admissions   | £12,088        |
| Ysgol Coed y Gof              | Primary<br>(4-11) | ASD and SLD  | 10 (Welsh medium)   | £11,694        |
| Allensbank Primary School     | Primary<br>(4-11) | SLCD   | 16  | £9,254         |
| Coed Glas                     | Primary<br>(4-11) | HI   | 16  | £14,070        |
| Pentrebane Primary School     | Primary           | ASD  | 16  | £12,965        |

|                             |                           |   |                                   |         |
|-----------------------------|---------------------------|---|-----------------------------------|---------|
| A.N.Other Primary School    | (4-11)                    |   | (First admissions September 2014) | tbc     |
| Fairwater Primary School    | Primary<br>(7-11)         | SEBD  | 8                                 | £8,938  |
| Glan yr Afon Primary School | Foundation Phase<br>(4-7) | Many pupils also have related needs such as speech and language disorders or delays; delayed literacy and numeracy. | 8 Nurture Base places             | £10,056 |

| <b>Main issues</b>  | <b>Actions planned or required</b>  |
|---|---|
| Demand has fallen over the last several years and a high number of 'empty' places were being funded.  | Two SRBs with low numbers have opted for 'phased closure'   |
| Some classes were designated for 10 pupils others for 8 although the review demonstrated the classes were equally complex.                              | The standard class number for all SRBs has now been standardised at 8, although there several classes still over that number in 2013-14.  |
| There is sufficient demand/need for a second primary SRB for ASD.   | Options for creating a second base, or converting from an existing base, are being considered.  |
| The SEBD bases have been developed in different ways and for different purposes. There is a need for early intervention through Nurture Base provision. | Glan yr Afon SRB is converting to a Nurture Base in 2013-14. Fairwater would be willing to convert but there are 10 long term pupils who would need alternative placement. These developments would be best considered as part of a wider strategic plan to include The Court, Greenhill and the PRU. |
| The skills and qualifications of SRB teachers and TAs vary widely from school to school. Practice and expertise is also uneven.                         | Additional EP time has been allocated this year, to support SRB improvement planning.<br>Proposal to establish a training action group of SRB heads.  |

|  |   |
|--|---|
| <p>As a result of parental pressure, some pupils have been individually funded for mainstream integration. Many others would benefit from integration but the cost of individual support for each child would be prohibitive and cancels out the economy of scale of an SRB.</p> | <p>Discussions with the SRB heads around how mainstream integration can be secured as standard for all SRB pupils by re-thinking the overall staff ratios and operation of the bases.</p> |
| <p>Standard of accommodation varies widely. Even in schools which have benefitted from significant SOP investment the SRB may not have been factored into the wider project. Potential for improvement also varies widely.</p>   | <p>There is a need for SRB numbers and accommodation to be factored into all future SOP projects as standard.</p>   |

## Appendix 5: Specialist Resource Bases in Secondary

Since the review was carried out in 2011, there have been some steps taken to fill 'gaps' in secondary provision through new developments, but no work has been taken forward collectively with the SRB Headteachers as has happened with the Primary SRBs.

### Specialist Resource Bases in mainstream secondary schools

| Schools                | Phase                | Range of needs                                     | Number of places<br>(NB This is the actual number currently on roll: in most cases there is flexibility in line with need/ demand) | Cost per place   |
|------------------------|----------------------|--|--|--|
| Cantonian High School  | Secondary<br>(11-18) | Pupils with Autism Spectrum Conditions             | 18   | £20,785  |
| Cathays High School    |                      |  | 14   | £24,153  |
| Llanishen High School  |                      |  | 3 (First admissions September 2013)  |  |
| Llanishen High School  | Secondary<br>(11-18) | Pupils with Hearing Impairments                    | 22   | £11,710  |
| St Teilo's High School | Secondary<br>(11-18) | Pupils with Visual Impairments                     | 3  | N/A In practice we have a 'virtual' base, with pupils across several high schools. The SRB staff were absorbed into the central team in order to facilitate a peripatetic approach to support. |
| Various High Schools   | Secondary<br>(11-16) | Pupils with specific speech and language disorders | 8 (This is a 'virtual' SRB which supports pupils in their local catchment High School.)  | £11,513  |

|  |                   |  |                                |         |
|--|-------------------|--|--------------------------------|---------|
| Cardiff High School  | Secondary (11-16) | Vulnerable learners with specific learning difficulties- dyslexia, dyscalculia, dyspraxia  | 14                             | £10,357 |
| Marion Centre, Bishop of Llandaff High School                      | Secondary (11-18) | Pupils with Autism Spectrum Conditions   | 36 (6 new admissions per year) | £18,945 |
| Cantonian High School in Partnership with Woodlands Special School | Secondary (16-18) | Pupils with significant learning delays. Many pupils also have related needs such as delayed development of language and communication; emotional, medical or sensory needs. | 8                              | £16,981 |
| Whitchurch High School   | Secondary (11-18) |  | 70                             | £10,357 |
| Ysgol Glantaf  | Secondary (11-18) |  | 10                             | £20,336 |

### General comments re secondary SRB provision

1. Most secondary SRB provision operates on a full-integration model, with pupils enrolled in mainstream classes as part of the standard admission number for the school. The pupils at three SRBs require small discrete class teaching, and are counted as additional to the standard admission number (i.e. at Whitchurch, Bishop of Llandaff and Cantonian SLD). This causes significant practical difficulties in providing opportunities for individuals or groups to access some mainstream learning opportunities when appropriate.
2. The ASD SRB budgets used to be supplemented by matrix funding for some individuals. Since delegation of matrix funding the extra staffing has been included in the SRB budget. This is a less flexible approach which can lead to over-staffing. For example, the numbers have fallen at Cathays ASD this year, which accounts for the high per pupil cost.

## **Appendix 6: Summary of actions undertaken since completion of the review in 2011**

1. Opening of the Marion Centre at the Bishop of Llandaff High School. A large purpose built centre for secondary pupils with ASD.
2. Development of a third secondary SRB for pupils with ASD at Llanishen High School, to supplement the SRBs at Cantonian High and Cathays High.
3. The Court Special School (SEBD) has developed a successful 'revolving door' class for pupils at School Action Plus which has enabled a significant number of pupils to return to their mainstream school after a period of intensive input.
4. The SRB for Visual Impairment has been transferred from Llanishen High School to St Teilo's High School. As anticipated, the period of transfer (which rolled out over 3-4 years) has resulted in VI placements being more widely distributed across the city. At present the VI SRB therefore operates as a 'Virtual SRB' based at St Teilo's but supporting pupils in 4 high schools.
5. A collaborative piece of work was undertaken by the Headteachers of Meadowbank Special School and Allensbank Primary, the Speech and Language Therapy Manager and the Lead Specialist Teacher for Speech and Language. The focus of this work has been to achieve more consistent criteria for speech and language placements, to support capacity building approaches and early intervention across mainstream schools and to ensure a more efficient and effective use of resources by achieving a single referral pathway and collaboration between Education and Health re the management of caseloads. The achievements of this piece of work include:
  - A re-focussing of Meadowbank Outreach Service
  - Roll out of Speech and Language Links in mainstream primary schools
  - Establishing a joint speech and language panel to consider all referrals and admissions
  - Earlier re-integration programmes for children in SRB or special school placements
  - Widespread consultation with parents re the 'gap' in secondary provision
  - Established a 'Virtual SRB' for secondary pupils to close the 'gap' and which will enable all pupils with specific speech and language difficulties to return to mainstream education at Year 7 or earlier.



6. A review and re-shaping of all Primary SRB provision is underway to reduce the number of 'surplus' places, refine admission criteria and support schools in developing a shared CPD programme for specialist teaching staff.

## **SEN Focus Group 1: provision for learners with social emotional and behavioural needs- Summary of stakeholder views**

### ***What makes a difference for learners with social emotional and behavioural needs?***

1. **Good multi agency working**, addressing education, social care and health needs. Ideally this should include well-coordinated liaison with Childrens Services; school-based services to address therapy and counselling needs, mental health and medical issues; educational psychology.
2. **Excellent teaching and learning**; a relevant, flexible curriculum tailored to pupils' specific learning needs.
3. **Good relationships**; trust and respect. Stability and consistency.
4. **Strong home-school links.**
5. **Attendance, engagement.**
6. **Inclusion.**
7. **Early identification and assessment**: a holistic view of the child and the needs that underpin challenging behaviours.
8. **Effective pathways to address the full range of needs**, e.g. speech language and communication, specific learning difficulties, social skills, emotional well-being, medical needs. Core entitlement.
9. **Accommodation that is 'fit for purpose'**. A calm, safe environment.
10. **Skilled staff**, access to good CPD.
11. **Effective outreach services focussed on capacity building** (whether provided by special schools, central or delegated services).

### ***What are the strengths and limitations of our current range of provision?***

#### **Strengths/ potential strengths**

Systems leaders/ challenge advisers should have a greater focus on this area.

Behaviour and Behaviour Management Policies

Securing enough capacity at each level

Clear entry/ exit criteria at each stage

Primary/ secondary graduated responses should be consistent

Clear links with achievement/ learning and behaviour.

Role of PARMs- Schools taking shared responsibility for placement/ provision decisions.

#### **Limitations/ weaknesses**

No post-16 provision

No special school places for girls

No links with speech and language services

Insufficient places

Reduced curriculum

Integration after the Revolving Door placement (at The Court) can be challenging: mainstream schools vary in their willingness.

Parenting

*Painting a blue sky...What might a successful spectrum of provision for learners with social emotional and behavioural needs look like?*

|   |   |
|---|---|
| Primary continuum:  | Secondary continuum:  |
| Whole school inclusive approach (BESD)...                       | Whole school inclusive approach...  |
| Person Centred Planning takes account of all needs...           | Person Centred Planning takes account of all needs...                       |
| In school nurture groups (ELSA)...                              | In school nurture groups (ELSA)...  |
| Access to Nurture Provision in every cluster of schools...      | PRU (stage 4) Ks3/KS4 dual registration...                                  |
| Pupils dual registered local school/ specialist base...         |   |
| Alternative curriculum- need more flexibility...                | Alternative provision pathways...   |
| Special schools- girls and boys catered for...                  | Special schools- should have health and childrens service staff attached... |
| NB Access to speech and language provision/support from stage 3 |   |

**Blue sky provision would include:**

- Full time innovative curriculum
- Access to mainstream where appropriate
- Age appropriate
- Mix of BESD provision to also meet underlying SEN issues
- Needs-led pathways/ provision planning for exact needs
- Multi agency working model: nurse; speech and language; YOS; social worker; flying start
- Early identification and intervention
- Supportive of pupils, parents and teachers
- Small scale settings

## **Plenary: 5 most important points to share**

### **5 Point Summaries from Groups**

#### **Group A**

1. Action – create a strategic overview and deliver.
2. Bravery – front load resource for long term gain.
3. Design an appropriate curriculum for SEBD needs – focus on achievement rather than attainment.
4. Early identification and holistic approach needed (Education, Health, Children, Parents).
5. Whole school inclusive approaches to nurture approach.

#### **Group B**

1. 24 hour integrated services
2. Multi agencies based in schools in cluster areas to increase attendance at specialist appointments and to provide training to upskill staff so consistency is achieved.
3. Joint policy commitment from all partners to provide sustainable annual core funding.
4. Schools to become the hub of the community and more family focussed.
5. Parenting support, parenting education and early family intervention is needed to be delivered from multi-agency providers.

#### **Group C**

1. Analyse need of SEBD and build for capacity.
2. Early identification and successful interventions so can target response correctly for each child's specific needs.
3. Purpose built accommodation in the right location at the right time at the right size including post 16 provision.
4. Training of staff and sharing of good practice – locally and across UK. Capacity building across all schools and provide a shared training schedule accessible by all school staff (including PRU, special schools and mainstream).
5. Undertake mapping of services – what is the point of the service, how can the service be accessed, how assess children to qualify for service, to ensure multi agency working with adequate funding.

## Appendix 4



### Cardiff Council Statutory Screening Tool Guidance

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

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

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

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

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

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

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

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

## Statutory Screening Tool

|   |  |
|---|--|
| <b>Name of Strategy / Policy / Activity:</b><br><br>School Organisation Proposals: The provision of additional Welsh-medium and English-medium primary school places in and around the Butetown, Canton, Grangetown and Riverside areas of Cardiff. | <b>Date of Screening:</b><br><br>November 2015 |
| <b>Service Area/Section:</b> Education  | <b>Lead Officer:</b> Nick Batchelar            |
| <b>Attendees:</b><br>Self-assessment  |  |

|   |   |
|---|---|
| <b>What are the objectives of the Policy/Strategy/Project/Procedure/Service/Function</b>  | <b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>   |
| <b>It is proposed to:</b> <ul style="list-style-type: none"> <li>• Close Meadowbank Special School by August 2017.</li> </ul> <p>This will be supported by the following proposed changes: -</p> <ul style="list-style-type: none"> <li>• An Increase in the capacity for mainstream support for children with speech and language needs</li> <li>• A change in the use of the Allensbank SRB to provide additional places for pupils with severe and complex learning difficulties</li> <li>• An increase in the number of Nurture/Revolving Door classes in mainstream schools across the city</li> </ul> | <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> |

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

|  |   |
|--|---|
|  | <p>language difficulties; literacy and numeracy delays.</p> <p>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.</p> |
|--|---|

## Part 1: Impact on outcomes and due regard to Sustainable Development

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

|            | Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?   | Please Tick |          |      |         | Evidence or suggestion for improvement/mitigation  |
|------------|---|-------------|----------|------|---------|--|
|            |   | <b>+</b>    | <b>-</b> | Ntrl | Un-Crtn |  |
| <b>1.1</b> | <p><b>People in Cardiff are healthy;</b><br/> <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li>• <i>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</i></li> <li>• <i>vulnerable citizens and areas of multiple deprivation</i></li> <li>• <i>Addressing instances of inequality in health</i></li> </ul> | ✓           |          |      |         | <ul style="list-style-type: none"> <li>- the proposal is likely to result in more children accessing provision in local schools avoiding the need for cross city travel.</li> <li>- the proposal would reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream throughout education.</li> <li>- the proposal would allow for continued high quality support for speech and language pupils in mainstream schools, with an extended specialist teacher team.</li> <li>- Developing additional provision (English-medium and Welsh-medium) for pupils with behavioural emotional and social difficulties will contribute to meeting the needs of vulnerable citizen.</li> </ul> |
| <b>1.2</b> | <p><b>People in Cardiff have a clean, attractive and sustainable environment;</b></p>   | ✓           |          |      |         | <ul style="list-style-type: none"> <li>- the proposal is likely to result in more children accessing provision in local schools avoiding the need for cross city</li> </ul>  |



|            | Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?   | Please Tick |   |      |         | Evidence or suggestion for improvement/mitigation  |
|------------|---|-------------|---|------|---------|--|
|            |   | +           | - | Ntrl | Un-Crtn |  |
|            | <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>the causes and consequences of Climate Change and creating a carbon lite city</i></li> </ul>   |             |   |      |         | travel.  |
|            | <ul style="list-style-type: none"> <li><i>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</i></li> </ul>   | ✓           |   |      |         | - the proposal is likely to result in more children accessing provision in local schools avoiding the need for cross city travel.  |
|            | <ul style="list-style-type: none"> <li><i>reducing environmental pollution (land, air, noise and water)</i></li> </ul>  | ✓           |   |      |         | - the proposal is likely to result in more children accessing provision in local schools avoiding the need for cross city travel.  |
|            | <ul style="list-style-type: none"> <li><i>reducing consumption and encouraging waste reduction, reuse, recycling and recovery</i></li> </ul>  |             |   |      |         | N/A  |
|            | <ul style="list-style-type: none"> <li><i>encouraging biodiversity</i></li> </ul>   |             |   |      |         | N/A  |
| <b>1.3</b> | <p><b>People in Cardiff are safe and feel safe;</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>reducing crime, fear of crime and increasing safety of individuals</i></li> <li><i>addressing anti-social behaviour</i></li> <li><i>protecting vulnerable adults and children in Cardiff from harm or abuse</i></li> </ul> | ✓           |   |      |         | <ul style="list-style-type: none"> <li>- the proposal would reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream throughout education.</li> <li>- the proposal would allow for continued high quality support for speech and language pupils in mainstream schools, with an extended specialist teacher team.</li> <li>- developing additional provision (English-medium and Welsh-medium) for pupils with behavioural emotional and social difficulties will contribute to meeting the needs of vulnerable citizens.</li> </ul> |
| <b>1.4</b> | <p><b>Cardiff has a thriving and prosperous economy;</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</i></li> </ul>   |             |   |      |         | N/A.   |

|     | Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?  | Please Tick |   |      |         | Evidence or suggestion for improvement/mitigation   |
|-----|--|-------------|---|------|---------|---|
|     |  | +           | - | Ntrl | Un-Crtn |   |
|     | <ul style="list-style-type: none"> <li>Assisting those Not in Education, Employment or Training</li> <li>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</li> <li>promoting local procurement opportunities or enhancing the capacity of local companies to compete</li> </ul>   |             |   |      |         |   |
| 1.5 | <p><b>People in Cardiff achieve their full potential;</b><br/>Consider the potential impact on</p> <ul style="list-style-type: none"> <li>promoting and improving access to life-long learning in Cardiff</li> <li>raising levels of skills and qualifications</li> <li>giving children the best start</li> <li>improving the understanding of sustainability</li> <li>addressing child poverty (financial poverty, access poverty, participation poverty)</li> <li>the United Nations Convention on the Rights of a Child and Principles for Older persons</li> </ul> | ✓<br><br>✓  |   |      |         | <ul style="list-style-type: none"> <li>the proposal would reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream throughout education.</li> <li>Developing additional provision (English-medium and Welsh-medium) for pupils with behavioural emotional and social difficulties will contribute to meeting the needs of vulnerable citizens.</li> </ul> |
| 1.6 | <p><b>Cardiff is a Great Place to Live, Work and Play</b><br/>Consider the potential impact on</p> <ul style="list-style-type: none"> <li>promoting the cultural diversity of Cardiff</li> <li>encouraging participation and access for all to physical activity, leisure &amp; culture</li> <li>play opportunities for Children and Young People</li> <li>protecting and enhancing the landscape and historic heritage of Cardiff</li> <li>promoting the City's international links</li> </ul>  |             |   |      |         | N/A   |

|     | Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?  | Please Tick |   |      |         | Evidence or suggestion for improvement/mitigation  |
|-----|--|-------------|---|------|---------|--|
|     |  | +           | - | Ntrl | Un-Crtn |  |
| 1.7 | <p><b>Cardiff is a fair, just and inclusive society.</b><br/>Consider the potential impact on</p> <ul style="list-style-type: none"> <li><i>the elimination of discrimination, harassment or victimisation for equality groups</i></li> <li><i>has the community or stakeholders been engaged in developing the strategy/policy/activity?</i></li> <li><i>how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</i></li> </ul> |             |   |      | ✓       | <p>See Equality Impact Assessment below (and attached).</p> <ul style="list-style-type: none"> <li>- Statutory public consultation would be carried out on formal proposals (including engagement with school pupils)</li> <li>- Relevant departments in the Council would be engaged</li> </ul> |
| 1.8 | <p><b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b><br/>Consider the potential impact on</p> <ul style="list-style-type: none"> <li><i>strengthening partnerships with business and voluntary sectors</i></li> <li><i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>  |             |   |      |         | 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 |   |
| Will this Policy/Strategy/Project have a <b>differential impact</b> on any of the following:  |             |   |      |         | <i>Please give details/consequences of the differential impact (positive and negative), and what action(s) can you take to address any negative implications?</i>   |
| <ul style="list-style-type: none"> <li><b>Age</b> (including children and young people aged 0-25 and older people over 65 in line with the United Nations Conventions)</li> </ul> |             |   |      | ✓       | <p><b>Age 4 – 11</b></p> <p>The likely closure date for Meadowbank School would be August 2017. The majority of current pupils will have transferred to secondary school or reintegrated to a mainstream primary by that date. Remaining pupils would be offered a range of options, depending on their needs and on parent's views:</p> <ul style="list-style-type: none"> <li>• Transfer to the SRB at Allensbank</li> <li>• A supported programme of reintegration to their local mainstream school. This would include funded additional support from an appropriately trained teaching assistant, school-based therapy if this continues to be an assessed need; support from the specialist teacher service.</li> </ul> <p>The proposed change of use at Allensbank School would be timed to take account of the needs and ages of existing pupils. The classes would continue to operate as a speech and language specialist setting until these pupils complete their primary education and transfer to secondary school.</p> <p>Changes would be carefully planned in consultation with parents and professionals to take account of the needs of pupils attending each of the affected settings, to minimise disruption to their learning and to take full account of parental views.</p> |

| 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><b><u>Employment Age</u></b></p> <p><i>Redeployment/recruitment</i></p> <p>There may still be a perception that redeployment/recruitment opportunities could be affected by age.</p> <p>The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.</p> |
| • <b>Disability</b>   |             |   | ✓    |         | Transport for disabled pupils would not be affected as it would be provided to meet the child's needs in accordance with the SEN Code of Practice.   |
| • <b>Gender Reassignment</b>  |             |   | ✓    |         | N/A  |
| • <b>Marriage &amp; Civil Partnership</b>   |             |   | ✓    |         | N/A  |
| • <b>Pregnancy &amp; Maternity</b>  |             |   | ✓    |         | N/A  |
| • <b>Race</b>   |             |   | ✓    |         | The proposal would not have a differential impact upon one particular ethnic group as the provision would be available to all.   |
| • <b>Religion/Belief</b>  |             |   | ✓    |         | N/A  |
| • <b>Sex</b>  |             |   | ✓    |         | <p>All schools would continue to admit pupils of both sexes.</p> <p>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.</p>   |
| • <b>Sexual Orientation</b>   |             |   | ✓    |         | Fears that recruitment opportunities could be affected by sexual   |

| 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>orientation.</p> <p>Evidence collated by the Stonewall lobby group alleges that LGB people are likely to be discriminated against in workplace recruitment.</p> <p>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.</p>   |
| <ul style="list-style-type: none"> <li>• Welsh Language</li> <li>• Other languages</li> </ul>                       | <p>✓</p> <p>✓</p> |   |      | <p>✓</p> | <p>The proposal would provide 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 s 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 proposal would offer the following educational benefits:

- Continued high quality support for speech and language pupils in mainstream schools, with an extended specialist teacher team.

- Reduce the number of school transfers for children with speech and language difficulties, by ensuring every child can be effectively supported in mainstream throughout their education.
- Significant expansion of Nurture and Revolving Door classes for children with behavioural social and emotional difficulties.
- Welsh medium specific provision for behavioural social and emotional difficulties.
- Expansion of SRB places for children with severe learning difficulties.

Pupils remaining in Meadowbank School at the time of closure would need to transfer to an alternative school, whether a supported return to mainstream, or a transfer to Allensbank SRB.

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

#### **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 post consultation

## Part 2: Strategic Environmental Assessment Screening

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

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

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

## Part 3: Habitat Regulation Assessment (HRA)

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

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



## Appendix 1 – Statutory Requirements

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

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

Initial Equality Impact Assessment  
**Corporate Assessment Template**



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

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

**It is proposed that:**

Meadowbank Special School close by August 2017.

This will be supported by the following proposed changes: -

- An Increase in the capacity for mainstream support for children with speech and language needs
- A change in the use of the Allensbank SRB to provide additional places for pupils with severe and complex learning difficulties
- An increase in the number of Nurture/Revolving Door classes in mainstream schools across the city

**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..

### **Interim and transition arrangements**

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

The likely closure date for Meadowbank School would be August 2017. The majority of current pupils will have transferred to secondary school or reintegrated to a mainstream primary by that date. Remaining pupils would be offered a range of options, depending on their needs and on parent's views:

- Transfer to the SRB at Allensbank

- A supported programme of reintegration to their local mainstream school. This would include funded additional support from an appropriately trained teaching assistant, school-based therapy if this continues to be an assessed need; support from the specialist teacher service.

The proposed change of use at Allensbank School would be timed to take account of the needs and ages of existing pupils. The classes would continue to operate as a speech and language specialist setting until these pupils complete their primary education and transfer to secondary school.

### 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.

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

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

#### **3-11 year olds**

The likely closure date for Meadowbank School would be August 2017. The majority of current pupils will have transferred to secondary school or reintegrated to a mainstream primary by that date. Remaining pupils would be offered a range of options, depending on their needs and on parent's views:

- Transfer to the SRB at Allensbank
- A supported programme of reintegration to their local mainstream school. This would include funded additional support from an appropriately trained teaching assistant, school-based therapy if this continues to be an assessed need; support from the specialist teacher service.

The proposed change of use at Allensbank School would be timed to take account of the needs and ages of existing pupils. The classes would continue to operate as a speech and language specialist setting until these pupils complete their primary education and transfer to secondary school.

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

#### **Redeployment**

There may still be a perception that redeployment opportunities could be affected by age.

The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 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                        | +ve |    |     |
| Physical Impairment                       | +ve |    |     |
| Visual Impairment                         | +ve |    |     |
| Learning Disability                       | +ve |    |     |
| Long-Standing Illness or Health Condition |     |    | X   |
| Mental Health                             |     |    | X   |
| Substance Misuse                          |     |    | 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:**

).

### 3.3 Gender Reassignment

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

|   | Yes | No | N/A |
|---|-----|----|-----|
| <b>Transgender People</b><br>(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:**

All schools would continue to admit pupils of both sexes.

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.

### 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:**

Fears that recruitment opportunities could be affected by sexual orientation.

Evidence collated by the Stonewall lobby group alleges that LGB people are likely to be discriminated against in workplace recruitment.

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.

### 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  | <b>Proposal seeks to establish Welsh –medium SEBD provision</b> | x  |     |
| Other languages |   | 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:

The proposal would provide Welsh-medium specific provision for behavioural social and emotional difficulties.

Other Language support

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?

- Statutory public consultation would be carried out on formal proposals (including engagement with school pupils)
- Relevant departments in the Council would be engaged

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

| Groups                       | Actions   |
|------------------------------|---|
| Age                          |   |
| Disability                   | Transport for disabled pupils would not be affected as it would be provided to meet the child's needs in accordance with the SEN Code of Practice |
| 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                     | None identified .   |
| Generic Over-Arching         | None identified .   |

**6. Further Action**

This equality impact assessment will be updated to reflect feedback received from the public consultation

**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 to provide additional Welsh-medium and English-medium primary school places in and around the Butetown, Canton, Grangetown and Riverside areas of Cardiff.**

### **Background**

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

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

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

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

### **Proposal**

**It is proposed that:**

Meadowbank Special School close by August 2017.

This will be supported by the following proposed changes: -

- An Increase in the capacity for mainstream support for children with speech and language needs
- A change in the use of the Allensbank SRB to provide additional places for pupils with severe and complex learning difficulties
- An increase in the number of Nurture/Revolving Door classes in mainstream schools across the city

### **Background to the proposal**

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..

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 and Language and SEBD 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 the change in the pattern of Speech and Language demand and the increased need for SEBD has to be addressed |
| 2. <i>Reduce</i> greenhouse gas emissions through:<br>a) Energy efficient building design and disposing of poor quality surplus accommodation<br>b) Promoting sustainable modes of transport and integrated transport systems | N/A<br><br>✓                   | N/A<br><br><b>the proposal is likely to result in more children accessing provision in local schools avoiding the need for cross city travel</b> | N/A<br><br>N/A | N/A<br><br>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. The proposal should have a positive impact on the environment as it will allow for children to be educated in a local school avoiding the need for cross city travel and the more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city.