

# **The Governing Body of Whitchurch High School**

## **Consultation Report**

### **Proposal for Additional Specialist Resource Base places at Whitchurch High School**

#### **Reason for this Report**

1. The Governing Body of Whitchurch High School in partnership with Cardiff Council recently consulted on a proposal to:
  - Increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
2. In accordance with the requirements of the Welsh Government School Organisation Code the Governing Body must publish a consultation report
  - summarising each of the issues raised by consultees;
  - responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and
  - setting out Estyn's response to the consultation in full, responding to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

#### **Consultation**

3. At its meeting on 24<sup>th</sup> February, 2022, the Governing Body agreed to hold a public consultation on proposals to:
  - increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
4. At its meeting on 14 October 2021, Cardiff Council Cabinet noted that a statutory consultation on the proposal was to be undertaken and authorised officers to provide all reasonable assistance.
5. The consultation on the proposed expansion of the Specialist Resource Base was undertaken jointly with proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision.
6. The consultation ran from 14 December 2021 to 01 February 2022 and was supported by Cardiff Council.
7. Parents and others in the local community, together with staff and Governors of other affected schools were invited to respond to the consultation.
8. The consultation process for all proposals involved:

- Publication of a bilingual consultation document outlining background, rationale and implications to parents, Headteachers and Chairs of Governors of Cardiff schools, staff, Members and other stakeholders; (a copy of the consultation document can be seen at Appendix 1);
  - Publication of a bilingual summary document setting out the main points of the consultation document; (a copy of the consultation document can be seen at Appendix 2);
  - Publication of information in community languages upon request;
  - Consultation meetings in person with pupil representatives; (notes from the meetings can be seen at Appendix 3);
  - A public consultation meeting via Microsoft Teams at which the proposal was explained by Council officers and questions answered; (notes from the meetings can be seen at Appendix 4);
  - Drop-in sessions via Microsoft Teams where council officers and representatives from the school were available to answer questions; (there were no requests);
  - Letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the area surrounding the school sites subject to the proposed changes;
  - A communication campaign via social media;
  - A consultation response slip for return by post or e-mail, attached to the consultation document;
  - An online response form on the Council's website [www.cardiff.gov.uk](http://www.cardiff.gov.uk)
9. For stakeholders who did not have access to digital platforms the opportunity to discuss the proposed changes via telephone was available.
10. The views expressed at Council organised meetings, drop-in sessions, telephone calls, and on paper or electronically through the appropriate channels, have been recorded.
11. Views were sought from interested stakeholders via an online survey and a hard copy version of the survey within the consultation document.
12. The details presented in this report, represent the views expressed during the consultation process. These include the wider stakeholder survey, formal responses, e-mail responses, views expressed at public meetings, drop-in sessions, telephone calls and the pupil consultation survey.
13. The views expressed in the wider stakeholder surveys reflect those raised in the e-mail responses received.

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

14. As set out at paragraph 5 the consultation on the proposed expansion of the Specialist Resource Base was undertaken jointly with proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision. The consultation included proposals for the establishment/expansion of additional learning needs provision at five secondary schools across Cardiff.

15. In total 114 responses to the consultation on the proposals for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision were received by the Council including 106 online responses and a further 8 e-mail responses regarding the specific proposals consulted on.
16. The Council received a number of formal responses to the strategic expansion of ALN provision which did not reference Whitchurch High School including a response from Estyn details of which can be found at [Cabinet 10 March 2022 SOP Complex learning needs App 6.pdf \(moderngov.co.uk\)](#)
17. Of the 106 online responses received, 89 respondents replied to the proposal to increase the designated number at the Specialist Resource Base for learners with complex learning needs from 70 to 100 from September 2022. Twenty respondents identified as a parent of a child at the school.
18. Of the 89 online responses almost nine in ten (87.6%) of respondents agreed with the proposal. If 'Don't know' responses are removed from the analysis, then agreement rises to 94.9%.
19. A summary analysis of the responses received can be seen at Appendix 5.
20. The points raised during the consultation are set out in *italics* below and have been grouped according to the issues raised where appropriate.
21. The Governing Body's response to each point can be seen underneath, under the heading "Appraisal of Views Expressed".

### **Formal Responses**

22. Formal responses to the consultation for secondary complex learning needs and autism spectrum condition Specialist Resource Base provision were received from:
  - Estyn.
23. The response from Estyn covered all of the secondary complex learning needs and autism spectrum condition proposals consulted on and was not specific to the expansion of the Specialist Resource Base at Whitchurch High School.
24. Estyn welcomed the proposals which sits alongside others and aims to achieve a more equitable provision to better match current and future learning needs of pupils, across the City.
25. The response from Estyn sets out its view that the proposals are likely to, at least, maintain the standard of education provision in the area.

26. Their response included the following points (for the full response, please see Appendix 6):

- *We welcome this proposal which sits alongside others and aim to achieve a more equitable provision to better meet the current and future additional learning needs of pupils, across the City.*
- *We consider that the proposal is likely to, at least, maintain the standard of education provision in the area.*
- *The proposals outline very clearly five broad principles that all schools and settings should aspire to and attain in effectively supporting pupils with additional learning needs... It is not clear however, if there is an overall framework that will help to ensure the realisation of the principles. An overall framework could be used also to guide and assist schools that are either establishing or developing specialist resource base provision. Neither is it clear what support or networks exist, or will be created, to support leaders and staff as they develop and embed effective practices in meeting the needs of pupils.*
- *The proposer states that a joint review of health and specialist provision in Cardiff special schools and the pupil referral units is being carried out. However, it is not clear if the scope and outcomes of the review will benefit pupils in specialist resource bases across the city. Neither is it clear if the review will look at Welsh medium provision alongside English medium provision.*
- *The proposal gives appropriate attention to the current capacity and how it is unable to meet the demands for places for pupils with complex learning needs and autism spectrum condition and the deficit of places currently available.*
- *The proposer defines specialist resource bases as “a small class in a mainstream school for pupils with significant additional learning needs. All pupils attending a specialist resource base have a statement of SEN and are taught by specialist teachers and learning support assistants, and have opportunities to learn, play or socialise with other mainstream pupils...” It is unclear from the definition whether pupils, where appropriate, can access, with appropriate support where necessary, lessons alongside pupils that do not attend the specialist resource base. To comply with the Additional Learning Needs and Education Tribunal [Wales] Act the proposer needs to consider the admission of pupils with individual development plans.*
- *The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access online public meetings. The*

*process is clearly set out with timescales and how the consultation will be used.*

- *Statements made by the proposer for all schools about for example, teaching and learning experience and care, support and guidance are identical and do not provide a good enough account of how these are tailored to meet the specific additional learning needs of the pupils.*
- *The proposal considers suitable alternatives, for all schools, and outlines the possible benefits and disadvantages appropriately.*
- *The proposals consider appropriately the travel implications for pupils. All proposals foresee the likelihood of reducing travel time from home to school for some pupils. They also identify the need to further assess the suitability of drop-off and pick up point at each school site.*
- *The overall proposal considers the provision for the Welsh language but does not reflect the ambition laid out in the local authority's draft Welsh in Education Strategic Plan 2022-2032. The plan states that the authority aims to increase the number of secondary specialist places to be delivered in an SRB located at each Welsh-medium high school with different specialist needs in each base to achieve a level of specialist provision that is on a par with other sectors and responds appropriately to individual need. This proposal does not address this particular aim sufficiently well.*
- *The proposer states that there is an opportunity to employ specialist staff and to work more closely with specialist services in Cardiff. However, no further detail is provided and there is no guarantee that the opportunity will translate into a firm commitment or reality. The proposer further states that the pool of Welsh speaking ALN qualified and experienced teaching staff is limited in number, in comparison to the English sector. It goes on to state that any plan to develop Welsh medium specialist provision will need to be supported by an Additional Learning Needs Workforce Development Plan but lacks any detail or commitment about how this will come about.*
- *The proposer correctly asserts that pupils with additional learning needs may find change difficult. Other than recognising that change needs to be carefully planned, information on transition planning is very limited.*

### **Appraisal of views expressed**

27. The Governing Body acknowledges the conclusions of Estyn on the overall merits of the proposals.

28. The broad principles outlined in the consultation document reflect the approach the Council takes when developing Additional Learning Needs provision.
29. The Council provides a range of support to specialist settings including specialist staff, CPD support for staff to development, ALNCO forums, cluster ALNCO meetings, termly additional learning needs updates for Headteachers and regular updates for governing bodies.
30. The Council is currently working with the Health Board to review services. This review will include consideration of specialist resource base provision in addition to special school provision
31. Pupils attending specialist resource base provision benefit from specialist curriculum which is tailored to meet their needs. However, where appropriate pupils access mainstream provision.
32. In line with the requirements of the Additional Learning Needs and Education Tribunal [Wales] Act, the transition to individual development plans is being progressed.
33. The planning of Welsh-medium specialist places city is not the responsibility of the Governing Body of Whitchurch High School.
34. The school continues to work with the Council to identify appropriate transition arrangements for pupils with additional learning needs. These arrangements are dependent on individual need and are progressed as required. This support includes the provision/timing of funding, support with the recruitment and training of staff, the identification of needs and ongoing reviews.

### **Pupil consultation**

35. Council officers met with Student Voice (Mainstream) pupils and a group of Y13 Pupils who attend the SRB at Whitchurch High to discuss their views on the proposed changes.
36. Amongst the mainstream pupils some learners felt that it would be fine to expand, as it's only a small number of additional pupils, and if these pupils needed a space at an SRB they should be able to take a space up. However, more classrooms may be needed.
37. There was a concern expressed about accessibility for learners who use a wheelchair as some of the corridors are narrow.
38. Some learners felt that there wasn't enough room for further SRB pupils or any more classrooms. One learner said that the SRB pupils take up a lot of tables at lunchtime in the canteen which doesn't leave enough space for other pupils (staggered lunchtimes, SRB have lunch earlier).
39. It was felt by some pupils that there needed to be more staff for the SRB if there were more pupils, who would understand their needs. It was added that there can be some difficulties with mixing when mainstream pupils

don't realise that pupils are from the SRB and may not make allowances for their behaviour in shared spaces. It was suggested that a tutorial lesson could be given over for mainstream pupils to learn more about the type of needs the pupils in the SRB have, so that they can understand them better.

40. Some of the pupils expressed concern that if the designated number was 70 and there are 96 pupils at the SRB, what is to stop the number going higher than 100? Some of the pupils were in favour of admitting more pupils, and others felt the number should stay at 70.
41. There was concern that if additional classrooms were needed that there was not sufficient space for them on the Upper School site. There was a suggestion that some existing classroom space could be freed up by dropping some of the less popular GCSE subjects.
42. There was a suggestion to put the SRB all on one site.
43. The Specialist Resource Base pupils felt that there would be enough space in the base to admit 4 more pupils, as long as there are not large Y10 and Y11 classes, as then more classroom space would also be needed. They mentioned that if there are large numbers within a year group, the group is split into two, and changes in classes can be difficult for pupils who feel anxious about meeting new people, although some pupils don't mind.
44. In terms of staffing, the pupils were not concerned, unless there is a large increase in the number of pupils.
45. In relation to outside space, the Specialist Resource Base used to have access to an Astroturf to play football and a sensory garden, but they can no longer access either of these as the space has been taken up with a new building. They now only have a small outside place and pupils agreed that they would like more outside space.
46. They also said that they would like to use the gym but that there isn't sufficient space for them to use it.

### **Appraisal of views expressed**

47. The Governing Body will work with the Council to improve and refurbish existing accommodation, creating additional classrooms and learning spaces. Some of this work has already been undertaken in order that the school, and Cardiff Council, can ensure sufficient places were available for children with complex learning needs.
48. The Governing Body will work with the Senior Leadership Team to consider how school facilities and outside spaces can be best used to meet the needs of all pupils.
49. The Governing Body will continue to work with the Council HR People Services to address the HR implications arising from the permanent increase in the designated number at Special Resource Base at the school and the resulting need for additional staffing.

50. The Governing Body will work with the Senior Leadership Team to bring forward activities to allow the development of a better understanding of the Specialist Resource Base provision across the wider school community.

### **Other responses received**

51. Reasons for supporting the proposed changes included:

- *Recognition of the need for increased additional learning need provision*

52. Whilst there was support for the expansion of specialist resource base provision at the school there were a number of concerns related to:

- *The need for investment in facilities/learning environment*
- *The need to train more specialist teacher and support staff*

### **Appraisal of views expressed**

53. Issues related to facilities/learning environment are addressed at paragraphs 47 – 48.

54. Issues related to staffing are addressed at paragraph 49.

### **Quality and Standards in Education**

55. The school continues to work closely with the Council to make sure that standards are high, that teaching is good, and that leadership and governance is strong.

56. Standards at the school are good. Increasing the Specialist Resource Base provision would provide appropriate high quality school places for young people with complex learning needs.

57. It is not expected that the proposal will impact on standards at the school. The proposal is not expected to have any negative impact on the quality of standards of education at the school as a result of the proposed changes.

58. The proposal is not expected to have any negative impact on teaching and learning experiences at the school. The school has an appropriate range of policies and provision in place to promote pupils' health and wellbeing. The school is committed to providing an environment in which learning is valued and pupils achieve their potential in a happy, safe environment in which they show respect and tolerance for each other.

59. The school continues to work to make sure everyone understands their responsibility for helping to improve and sustain high performance. The school has good relationship with parents and other partners and pupils receive a high-quality education.



60. The proposed changes would be planned carefully so that leadership and governance is not disrupted, which could have a negative impact on educational standards.

### **Transport Matters**

61. The Council applies the two-mile statutory qualifying walking distance criteria for pupils to qualify for free home to school transport to specialist resource bases. Some specialist resource base learners who live within two miles of the school may be provided with free transport due to their individual learning needs and social issues. Other learners are able to travel independently or with parent/carers and if resident within the two-mile qualifying distance may not be eligible for Learner Transport. These pupils as well as staff and school visitors would benefit from any required improvements in facilities for active travel to school or public transport facilities.
62. The Council's current Corporate Plan includes a commitment to every school in Cardiff developing an Active Travel Plan. Such a plan will identify actions by the school to support and encourage active travel to school and also any improvements to on-site and off-site infrastructure required to facilitate active journeys.
63. Increasing travel to school by active modes (walking, cycling and scooting) by ensuring safe facilities are provided will have a positive impact on children's health and wellbeing. A number of initiatives have successfully demonstrated support and encouragement for active and sustainable travel amongst the Additional Learning Needs cohort, which would be offered to learners as appropriate, including Independent Travel Training for older pupils (to be reviewed each year), cycle maintenance and cycle training.
64. With the expected increased demand for Learner Transport suitable improved and / or expanded facilities for drop-off and pick-up may be required within the site to accommodate the appropriate numbers of vehicles. Other improvements may include modifications to the layout, signing and traffic control measures.

### **Community Impact**

65. The Council has considered the impact on the wider community and has concluded that the proposal would have any wider impact.

### **Admission Arrangements**

66. Admissions to specialist provision are managed by the Council, subject to a statement of Special Education Needs (SEN). Under the ALN Code, placement will be subject to an Individual Development Plan (IDP).
67. There are no planned changes to the Council's policy on the admission of children to schools as a result of this proposal.

68. Detailed information about admission arrangements is in the Council's Admission to School booklet. This information can be found on the Council's website at [www.cardiff.gov.uk](http://www.cardiff.gov.uk).
69. There are no planned changes to the school's policy on the admission of children to the school as a result of this proposal.

## **RECOMMENDATIONS**

1. The Governing Body is recommended to publish proposals in accordance with section 48 of The School Standards and Organisation (Wales) Act 2013 on proposals to:
  - increase the designated number at Whitchurch High School Specialist Resource Base from 70 to 100 from September 2022.
2. Note that in the event of there being no objections to the published proposals a further report will be considered by the Governing Body prior to implementation of the proposal.
3. Note that in the event of objections to the published proposal being received, the proposal would be referred to the Local Authority (Cardiff Council) for determination within 35 days of the end of the objection period. The Local Authority has 16 weeks from the end of the objection period to determine the proposals.

*The following appendices are attached:*

- Appendix 1 – Consultation Document
- Appendix 2 – Summary Document
- Appendix 3 – Notes of pupil meetings
- Appendix 4 – Notes of public meetings
- Appendix 5 – Summary analysis of responses
- Appendix 6 – Estyn Response to the consultation