

Appendix 10: Summary Analysis of responses received

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Background

Children and young people with complex learning needs have a range of issues and a combination of layered needs. These could include needs related to learning, communication, physical or sensory disabilities.

The Council wants to make changes to the provision for primary aged learners with complex learning needs.

The Council set out a number of proposals to increase the number of specialist resource base places for primary aged learners with complex learning needs and/or autism, and sought the views of parents, staff and governors of affected schools, Headteachers and Chairs of Governors city-wide, elected Members, local residents and other stakeholders; on the proposed changes.

Proposals

- Establish a 20-place specialist resource base for Complex Learning Needs and / or Autism at Coed Glas Primary School from September 2024, within the existing buildings.
- Establish a 20-place specialist resource base for Complex Learning Needs and / or Autism at Greenway Primary School from September 2024, within the existing buildings.
- Establish a 20-place specialist resource base for Complex Learning Needs and/ or Autism at Severn Primary School from September 2024, within the existing buildings.

Methodology

- Publication of bilingual consultation documents outlining background, rationale and implications to parents, staff and governors of affected schools, Headteachers and Chairs of Governors city-wide, elected Members, local residents and other stakeholders;
- Publication of bilingual summary documents setting out the main points of the consultation documents. These were also made available in Arabic, Polish and Bengali;
- Publication of information in further community languages upon request;
- Consultation meetings offered to all Governing Bodies via Microsoft Teams/in person. Meetings were held with full Governing Bodies or groups of governors at Baden Powell Primary School, Fairwater Primary School, Herbert Thompson Primary School, Lakeside Primary School, Springwood Primary School, Ysgol Gyfun Gymraeg Plasmawr, Coed Glas Primary School, Greenway Primary School and Severn Primary School;

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- Consultation meetings offered via Microsoft Teams/in person with staff, where requested by the school. Meetings with staff were requested by Fairwater Primary School and Coed Glas Primary School;
- Consultation meetings offered to all schools via Microsoft Teams/in person with pupil representatives at Baden Powell Primary School, Fairwater Primary School, Herbert Thompson Primary School, Lakeside Primary School, Springwood Primary School, Ysgol Gyfun Gymraeg Plasmawr, Coed Glas Primary School, Greenway Primary School and Severn Primary School;
- Public consultation meetings were offered in person and via Microsoft Teams at which the proposals were explained and questions answered. Meetings took place where attendance had been pre-booked;
- Drop-in sessions in person and via Microsoft Teams where officers were available to answer questions;
- Letters setting out details of the proposals and where further information could be found were sent to local residents and businesses in the areas 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 documents and summary documents;
- Online response forms were hosted on the council's website. The response form was available in English, Welsh, Arabic, Polish and Bengali.

Responses

There were 57 responses received to the consultation.

Given the low base size, figures reported are the actual numbers, rather than percentages.

**SPECIALIST PROVISION FOR PRIMARY
AGED LEARNERS WITH COMPLEX
LEARNING NEEDS AND / OR AUTISM**

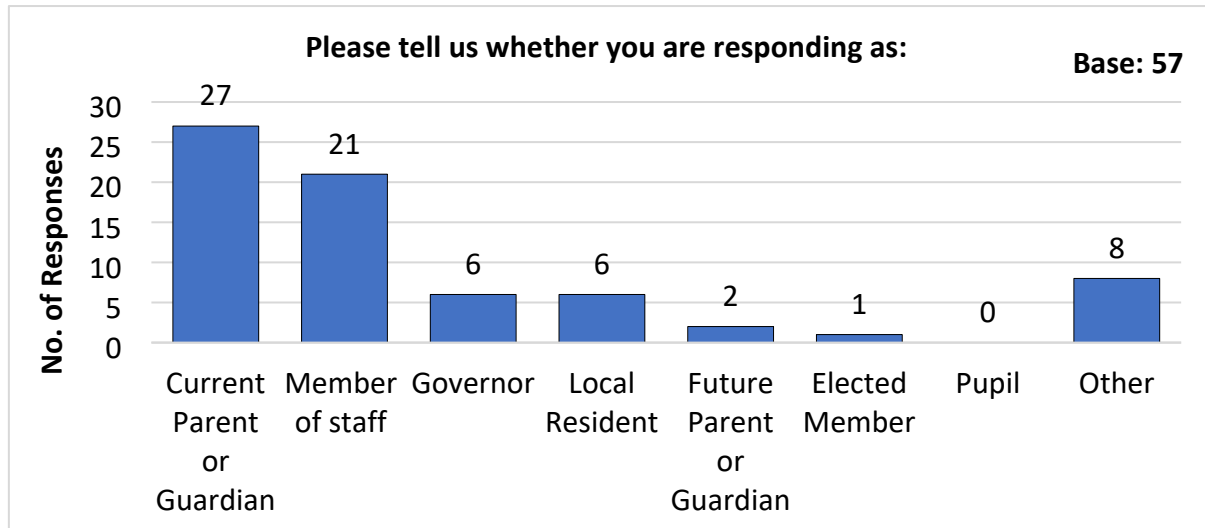
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Results

Please tell us whether you are responding as:

There were 57 responses received to this question; of these 27 came from a **Current Parent or Guardian**. This was followed by a **Member of Staff** (21).

There were no responses received from pupils.



NB. Responses total more than the base size as respondents could select more than one option.

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Please confirm which school/s you are affiliated with:

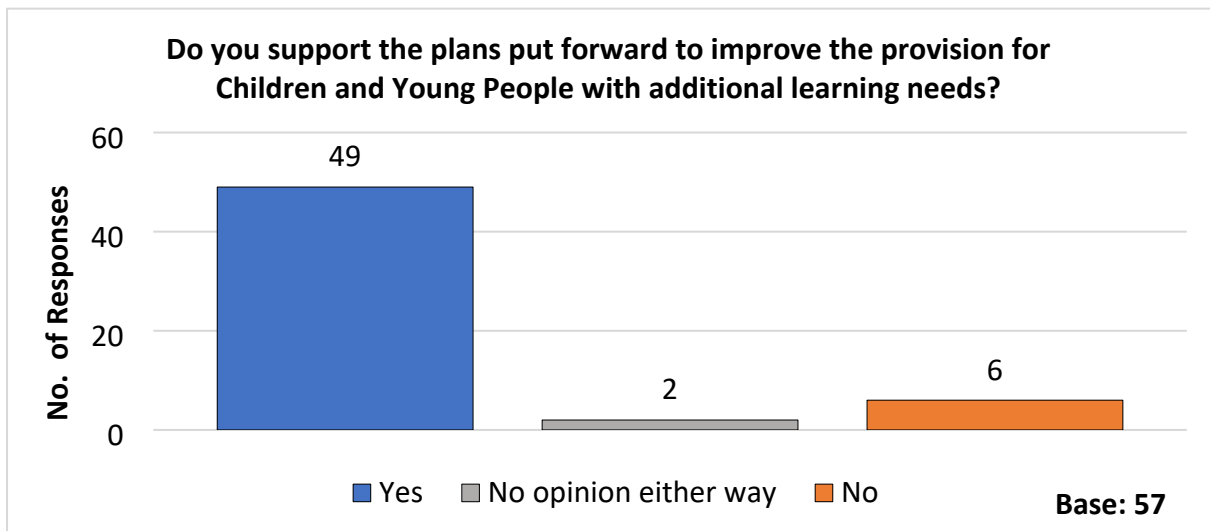
	No.
Coed Glas Primary School	7
Kitchener Primary School	7
Lakeside primary	2
Roath Park Primary School	2
Severn Primary	2
St Mary's Catholic Primary School	2
Christ the King	1
Corpus Christi	1
Court Special School	1
Eastern High	1
Fitzalan High School	1
Gladstone primary	1
Greenway	1
Hawthorn primary	1
Kings Monkton	1
Marlborough Primary School	1
Oakfield Primary	1
Rumney primary	1
Springwood primary	1
St Mary the virgin CIW primary school	1
The hollies	1
Ton yr wyen	1
Ty Gywn	1
Whitchurch Primary	1
Ysgol Bro Eirwg, Ysgol Bro Morgannwg,	1
Total Respondents	31

NB. Total Respondents is less than the total number of responses given for individual schools as respondents could be affiliated with more than 1 school

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

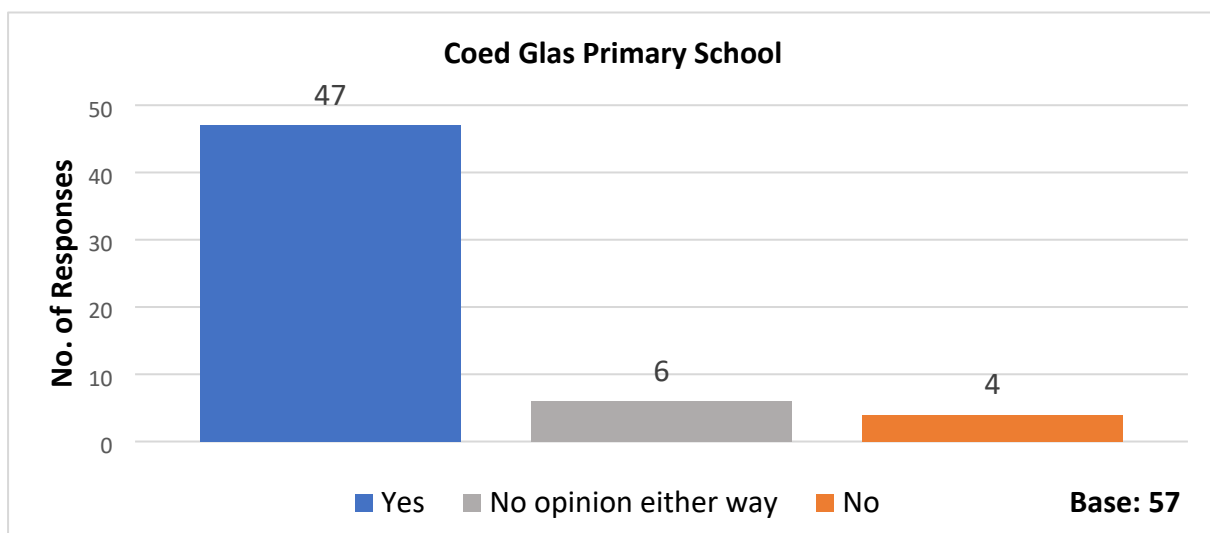
There were 57 responses received to this question; of these 49 were in support of the proposal, and six against.



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

Coed Glas Primary School

There were 57 responses received to this question; of these 47 were in support of the proposal.



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If you do support the proposed changes for Coed Glas Primary School, please explain why: Respondents were given the opportunity to explain their reasoning for supporting the proposal for Coed Glas Primary school. Overall, 33 comments were received and grouped into themes. A full list of themes with example comments are shown below.

Theme	No	%	Example Comments
Demand in Provision for SEN across Cardiff	22	66.7	<ul style="list-style-type: none"> - Provision in schools for autism is woeful. More sites might relieve pressure on individual schools. - My daughter has been accepted for a sen school place but there are currently no spaces - We need to ensure provision across Cardiff - Not enough ALN places across the city - Support is needed all over Cardiff
Provision for SEN is needed in specific areas in Cardiff	6	18.2	<ul style="list-style-type: none"> - There is a need in the community - It is a much needed provision in that area of the city. - Needed for the local children
Important for development of the child/children	3	9.1	<ul style="list-style-type: none"> - Having an appropriate place of education and learning is important to the growth and development of the children diagnosed.
Other	3	9.1	<ul style="list-style-type: none"> - Because too many useless charities to help disabled children and adults like Learning Disability Wales etc
Total Respondents	33	-	

NB. Percentages total more than 100% as comments could fall into more than one theme.

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If you do not support the proposed changes for Coed Glas Primary School, please explain why.

Respondents were given the opportunity to explain their reasoning for not supporting the proposal. Overall, 3 respondents left feedback, a full breakdown of which can be viewed below.

Do not support proposal.

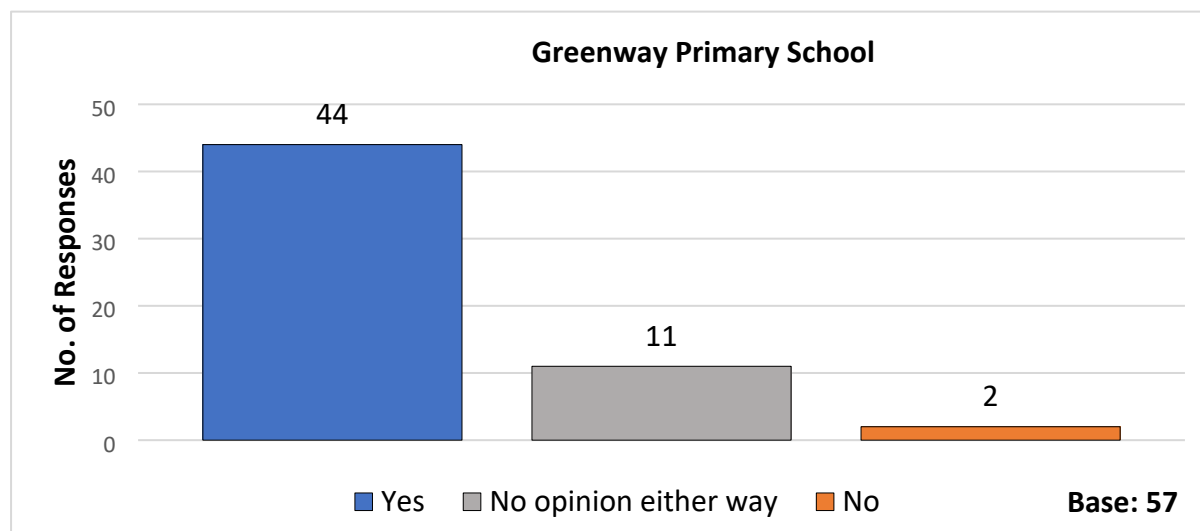
- “I am concerned that children with behavioural problems can be violent. I want more information on how these children will be kept separated from the other children, considering that the proposals state they will be housed in the same building.”
- “Too much time taken away from teachers and students in the mainstream setting.”
- “The school is large and noisy, some children with autism would find this overwhelming. The point of inclusion is to enable children to take part altogether in play, this would need to be staffed properly and maybe a separate play area as too many children on the playground as once would also be overwhelming. The lunch hall is noisy and busy. If the base staff are off ill, where would the specialist staff come from or would the staff be expected to cover. The teachers are already dealing with undiagnosed children in their classes with classes up to 30 children they are at the limit of exhaustion.”

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

Greenway Primary School

There were 57 responses received to this question; of these 44 were in support of the proposal – slightly lower than for Coed Glas, but more respondents offered ‘no opinion’ for this proposal.



If you do support the proposed changes for Greenway Primary School, please explain why: Respondents were given the opportunity to explain their reasoning for supporting the proposal for Greenway Primary school. Overall, 29 comments were received and grouped into themes. A full list of themes with example comments are shown below.

Theme	No	%	Example Comments
Demand in Provision for SEN across Cardiff	18	62.1	<ul style="list-style-type: none"> - The proposed extension to provision for children with ALN is a really positive development as there is such an increasing demand. - Children need this provision - Lack of spaces in other schools - Not enough ALN places across the city - Support is needed all over Cardiff
Proposal will benefit children with ALN greatly	5	17.2	<ul style="list-style-type: none"> - To give children with ALN a good start to school life - It Will Help Develop More Pupils.
Provision for SEN is needed in specific areas in Cardiff	4	13.8	<ul style="list-style-type: none"> - There are no schools in the CF3 area with specialist places.
More SEN in Mainstream schools	2	6.9	<ul style="list-style-type: none"> - More specialist SEN provision within a mainstream school across Cardiff is needed

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Other	2	6.9	- This could be done quickly as in existing buildings and adults like Learning Disability Wales etc
Total Respondents	29	-	

NB. Percentages total more than 100% as comments could fall into more than one theme.

If you do not support the proposed changes for Greenway Primary School, please explain why.

Respondents were given the opportunity to explain their reasoning for not supporting the proposal. Overall, two respondents left feedback; one can be viewed below (the second response reflecting personal experience and not suitable for publication)

Do not support.

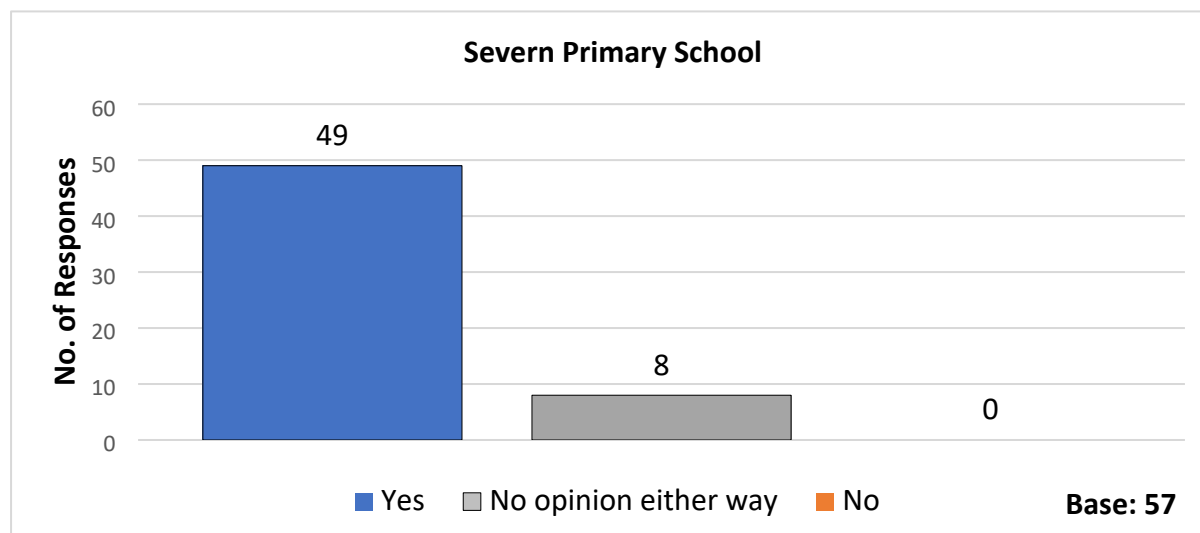
- "This school had a lot of challenges surrounding it already. It has multiple add ons to the school and children with ALN need small environments with acceptance and the ability to feel safe!"

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

Severn primary School

There were 57 responses received to this question; of these 49 were in support of the proposal, the highest level of support for the three options. No-one opposed this proposal.



If you do support the proposed changes for Severn Primary School, please explain why.

Respondents were given the opportunity to explain their reasoning for supporting the proposal for Severn Primary school. Overall, 34 comments were received and grouped into themes. A full list of themes with example comments are shown below.

Theme	No	%	Example Comments
Demand in Provision for SEN across Cardiff	15	44.1	<ul style="list-style-type: none"> - Provision in schools for autism is woeful. More sites might relieve pressure on individual schools. - My daughter has been accepted for a sen school place but there are currently no spaces - We need to ensure provision across Cardiff - Not enough ALN places across the city - Support is needed all over Cardiff
Provision for SEN is needed in specific areas in Cardiff	10	29.4	<ul style="list-style-type: none"> - There is a need in the community - It is a much needed provision in that area of the city. - Needed for the local children
Proposal will benefit children with ALN greatly	7	20.6	<ul style="list-style-type: none"> - Having an appropriate place of education and learning is important to the growth and development of the children diagnosed.

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More SEN in Mainstream schools	3	8.8	- More provisions should be made in mainstream
Other	3	8.8	- Children with ALN are struggling, children have the right to be supported.
Total Respondents	34	-	

NB. Percentages total more than 100% as comments could fall into more than one theme.

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

Respondents were invited to leave comments on any changes or alternative suggests they had in relation to the specialist provision for primary aged learners with complex learning needs and / or autism proposals.

Overall, 22 comments were received and grouped into themes. A full list of themes with example comments are shown below.

Theme	No	%	Example Comments
Specialist Provision based on individual schools/pupils needs	5	22.7	<ul style="list-style-type: none"> - Neurodiversity isn't just Autism. Please consider children with FASD. My child has never had his needs met in Cardiff primary schools. - There are a lot of children who are on spectrum who struggle in mainstream but do not meet criteria to switch to specialist schools
Provision needed across all schools - ages/language/faith	4	18.2	<ul style="list-style-type: none"> - More places at every school level - Need more within Welsh language schools
Separate school/units are needed	3	13.6	<ul style="list-style-type: none"> - Just that there should be a purpose built school for autism in CF3 area!
More provision within mainstream schools	2	9.1	<ul style="list-style-type: none"> - It's important to ensure that the new class will be part of the existing school and there will be interaction between pupils in all classes as there is now.
Ensure staff are trained/Qualified	2	9.1	<ul style="list-style-type: none"> - Qualified staff to be used in the specialist placements.
More provision for SEN is needed	2	9.1	<ul style="list-style-type: none"> - 20 places in the area is not enough. There should be 2 srb classes
Preferred schools to have SEN unit	2	9.1	<ul style="list-style-type: none"> - ST PAUL'S TO HOST.
Other	3	13.6	<ul style="list-style-type: none"> - For Greenway not to have the resource. Many children with differing needs and abilities were 'encouraged' to move schools because they couldnt manage behaviour appropriately
Total Respondents	22	-	

NB. Percentages total more than 100% as comments could fall into more than one theme.

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Do you wish to make any additional comments?

Respondents were invited to leave any additional comments they had in relation to the specialist provision for primary aged learners with complex learning needs and / or autism proposals.

Overall, 32 comments were received and grouped into themes. A full list of themes with example comments are shown below.

Theme	No	%	Example Comments
Provision is needed for all schools - ages/languages/faiths	8	25.0	<ul style="list-style-type: none"> - Where is this provision in terms of Welsh education? Pwll Coch numbers are extremely low? Once again, lack of planning and forward thinking. There is no provision for these pupils in Pwll Coch to go to Secondary - Can we think about establishing this kind of specialist base within some of our faith schools please. - Please ensure there is appropriate capacity within the secondary sector to accommodate these additional SRB pupils
Comments on school funding	7	21.9	<ul style="list-style-type: none"> - I support this so long as it won't mean less funding for schools without this provision - Our school does not have the correct budget to provide support for ALN children who need 1:1's. - There is not enough properly funded provision for pupils with ALN across Cardiff schools.
Specialist Provision should be done by individual schools/pupils needs	7	21.9	<ul style="list-style-type: none"> - There are a lot of children who are on spectrum who struggle in mainstream but do not meet criteria to switch to specialist schools - More support for higher academically functioning but have additional needs autism adhd - I hope these are used for complex learning needs and autism and not as a behaviour base
Demand in Provision for SEN across Cardiff	4	12.5	<ul style="list-style-type: none"> - There also aren't enough specialist places across the city - Its about time there were more provisions.

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Ensure staff are qualified/ trained/experienced in teaching pupils with Special Needs	4	12.5	<ul style="list-style-type: none"> - I would like to ensure that the teachers and TA employed have experience in special needs and aren't just new to reaching or agency staff - All staff need to be educated to help understand and support children with autism and additional learning needs.
Comments of children's safety/health & wellbeing	3	9.4	<ul style="list-style-type: none"> - An additional comment of safety going in & out of school from the back entrance upon Fidas road, cars are able to use this road and do so sometimes without concern that children are waiting to go into school. As with young children and those with additional needs safety is of the utmost importance and therefore, I feel that this road and its accessibility should be addressed at the beginning and end of the school day.
Other	4	12.5	<ul style="list-style-type: none"> - what steps will be taken to safeguard the learning opportunities of the current pupils?
Total Respondent	32	-	

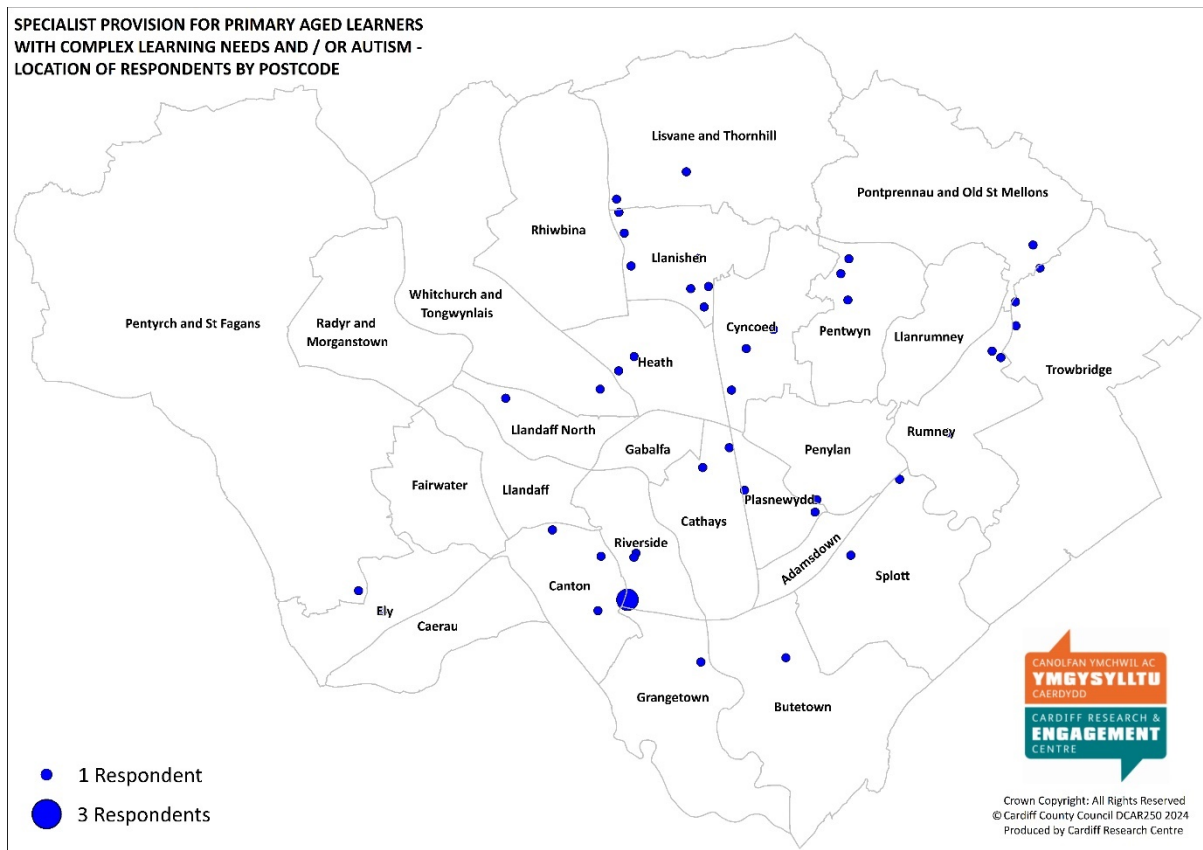
NB. Percentages total more than 100% as comments could fall into more than one theme.

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About You

Please provide your full postcode below (e.g. CF10 4UW) so we can be sure we hear the views of local residents:

Respondents were asked to provide their home postcode. There were 47 postcodes received, with 46 of these residing in Cardiff. These can be viewed below.



There was also one response received from Dinas Powys in the Vale of Glamorgan.

What was your age on your last birthday?

	No.
16-24	2
25-34	12
35-44	26
45-54	7
55-64	4
65-74	1
Prefer not to say	3
Total Respondents	55

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Are you...?

	No.
Female	48
Male	2
Non-Binary	0
Prefer not to say	4
Total Respondents	54

Do you identify as Trans?

There were 54 responses to this question. None of the respondents identify as Trans.

Do you identify as a disabled person?

	No.
Yes	5
Prefer not to say	5
No	44
Total Respondents	54

Please tick any of the following that apply to you:

17 people identified a health condition that applied to themselves, these can be viewed below:

	No.
Deaf/ Deafened/ Hard of hearing.	3
Mental health difficulties	8
Learning impairment/ difficulties	2
Visual impairment	1
Mobility impairment	1
Long-standing illness or health condition (e.g. cancer, diabetes, or asthma).	4
Total Respondents	17

NB. Total Respondents is less than the total number of responses given for each health condition as more than one condition could be selected.

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What is your ethnic group?

Where the term 'British' is used, this refers to any of the four home nations of Wales, England, Northern Ireland and Scotland, or any combination of these.

	No.
White – Welsh /English / Scottish / Northern Irish / British	46
White – Any other white background	1
Mixed/Multiple Ethnic Groups – White and Black Caribbean	1
Asian/Asian Welsh/British - Pakistani	1
Prefer not to say	4
Total Respondents	53

Appendices

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

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

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

This report has been prepared by His Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals. Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

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

Summary/Conclusion

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

Description and benefits

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Education aspects of the proposal

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Greenway Primary School

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

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

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

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

Severn Primary School

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

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

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

Appendix 10: Summary Analysis of responses received

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

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

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

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Albany Primary School Governing Body

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

Yes.

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

Yes.

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

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

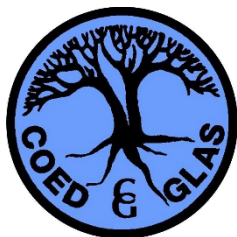
Do you wish to make any additional comments?

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

Cathy Madge
Albany Primary School Chair of Governors

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Coed Glas Primary School Governing Body



COED GLAS PRIMARY SCHOOL

Ty Glas Avenue, Llanishen, Cardiff, CF14 5DW
frontdesk@coedglasprimary.co.uk
029 2075 4862



Headteacher: Mrs Sophie Notley

8.01.24

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

Governor's response

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

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

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

Reducing the PAN

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

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SRB be opened at Coed Glas, there is a real risk of class sizes increasing to unmanageable levels. Continuing with a PAN of 75 alongside opening an additional SRB is not feasible.

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

Workload

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

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

Funding

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

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

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Governors are already aware and have met with Cardiff Council transport representatives regarding the consultation on changes to parking outside of Coed Glas Primary. This will further reduce the opportunity for additional staff to park nearby.

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

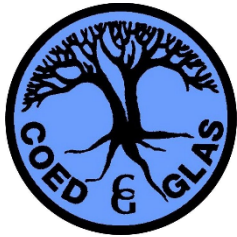
Staffing and budget

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

Kelvin Pritchard
Chair of Governors

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Coed Glas Primary School Headteacher



COED GLAS PRIMARY SCHOOL

Tŷ Glas Avenue, Llanishen, Cardiff, CF14 5DW

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029 2075 4862



Headteacher: Mrs Sophie Notley

12.01.24

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

Headteacher's response

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

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

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

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

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

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

Barriers and solutions

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

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

Appendix 10: Summary Analysis of responses received

adds to staff workload. The impact of having pupils with ALN, EAL and challenging behaviours in some classes has been significant. It would be essential that serious consideration would be given by the panel regarding year groups that already have a high number of children from our current SRB alongside higher numbers of children with IDPs requiring ALP in mainstream.

Staffing and budget

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

Practical points – parking

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

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

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Funding to improve current buildings

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

Key points:

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



Sophie Notley
Headteacher

Appendix 10: Summary Analysis of responses received

Greenway Primary School Governing Body / Headteacher

**Greenway Primary
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Tel: 029 20777048**



**Ysgol Gynradd
Greenway
Heol Llanstephan,
Tredelerch,
Caerdydd.
CF3 3JG**

Headteacher / Prifathro: Mr Nic Naish

Email / Epost: greenwayprm@cardiff.gov.uk

RE: ALN consultation response

19.1.24

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

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

With thanks

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

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



15th January

2024

To whom it may concern,

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

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

Plan 1

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

Location and learning environment

- The SRB to be located in the current Year 3 classrooms. This is because both classrooms are situated in the heart of the school meaning pupils who access

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the SRB are at the centre of school life and feel included as part of Severn Primary School.

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

Plan 2

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

Benefits and opportunities for the school

- Opportunities for pupils with complex needs to be supported in our cluster with education provision which meets their specific needs
- The SRB would further enhance Severn as an inclusive school community
- Pupils would have a personalised curriculum to help develop their skills
- Specialist teachers and teaching assistants on site to support other colleagues
- Parents would less anxious about sending their children to provision in a different part of the city.
- The SRB would offer a more inclusive approach for all stakeholders
- The school would receive additional funding to run the SRB
- There would be potential to increase the numbers of pupils who could attend Severn Care Club if the upstairs could be used to house classes. The current Reception classroom could become Severn Care Club. This would

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allow Nursery parents to use the provision in the morning which is not currently available. This could in turn increase numbers on roll for the school moving forward

Threats

Budget

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

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School building

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

Additional concerns

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

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

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

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

Estyn October 2023.

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

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

Yours sincerely

Mr Nick Wilson
Headteacher

Mr Andy Roberts
Chair of Governors

Mr Andrew Jones
Deputy Headteacher

Mrs Waj Bibi
Additional Learning Needs Coordinator