

## Appendix 9

### **Specialist Provision for Primary and Secondary Aged Learners with Emotional Health and Wellbeing Needs: summary of the responses received and appraisal of the views expressed**

1. The points of view received as part of the consultation are set out in *italics* below and have been grouped according to the points raised where appropriate.
2. The Council's response to each point can be seen underneath, under the heading "Appraisal of views expressed."
3. Formal responses were received from:
  - Estyn
  - Baden Powell Primary School Governing Body
  - Baden Powell Primary School Headteacher
  - Fairwater Primary School Headteacher
  - Herbert Thompson Primary School Governing Body
  - Lakeside Primary School Governing Body
  - Springwood Primary School Governing Body
  - Ysgol Gyfun Gymraeg Plasmawr Governing Body and Headteacher
  - Ysgol Gymraeg Pwll Coch Governing Body
  - RhAG - Rhieni Dros Addysg Gymraeg (Parents for Welsh Medium Education)

#### **Estyn**

4. Estyn submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - *Overall, Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area. However, further consideration needs to be given to the detail in establishing and running a specialist provision within a mainstream school and the implications on all learners, staff and their parents.*
  - *The local authority has set out a clear rationale for its proposal. Essentially, this relates to increasing demand for specialist provision and better distribution of that provision within the City.*
  - *the proposal does not provide information on the extent to which demand is increasing. The proposal refers to a lack of capacity in its special schools and the pressures in using out of county placements. However, it is not clear how the use of out of county placements is directly relevant to the proposals.*

- *It is not clear why the demand for secondary age learners is so much greater than primary and whether the proposed increases in places for both primary and secondary learners are sufficient to meet demand.*
- *no specific information is given in relation to the proposed benefits for learners, or what the curriculum or wider provision including support, is likely to be.*
- *The local authority does not provide an overview of any alternative options that may have been considered.*
- *it is not clear from the proposal whether any learners in receipt of free home-to-school transport, will be disadvantaged by not being able to access pre and/or after school provision, particularly if the timing of the transport provision isn't flexible.*
- *The proposal does not indicate whether pupils will be dislocated from existing mainstream or specialist provisions and the support, including transition arrangements, that pupils and their parents are likely to need and benefit from.*
- *The local authority does not provide information on costs in relation to establishing or replacing existing provision and neither does it consider whether there is the need for any building, refurbishment, or adaptation to proposed or existing provision. It is not clear that accommodation within the proposed schools has been identified.*
- *The proposal does not provide information in relation to proposed staffing arrangements or how staff will be supported.*
- *The local authority has not provided a Welsh Language Impact Assessment as part of this proposal. It is noted that specialist resource provision will be based in two Welsh medium schools. However, it is not clear if the provision will be through the medium of Welsh.*
- *The local authority has not provided a Community Impact Assessment as part of this proposal.*
- *Overall, the local authority has not considered in any detail, other than those issues potentially related to location and transport, the likely impact of the proposals on learners, their parents or the proposed schools.*
- *The proposal provides a high-level overview of the most recent inspection outcomes for the seven schools. However, it does not provide sufficient information on the commentary in relation to additional learning needs [ALN].*
- *Overall, inspection findings in relation to progress of and provision for pupils with ALN is positive in nearly all of the schools being considered in the proposal.*

## **Appraisal of views expressed**

5. The Council acknowledges the conclusions of Estyn on the overall merits of the proposals.
6. The Council's Inclusion Service works closely with schools hosting specialist provision, supporting and advising on appointments; the learning environment; and the management of the learning day.
7. Schools new to hosting provision are encouraged and supported to visit existing provision, and to join professional learning forums with specialist staff working in other schools.
8. The consensus from schools currently hosting resource bases is that the experience enhances learning for all pupils, and further strengthens the inclusive ethos of the school and the community.
9. The Council coordinated an ALN Conference on 30th January 2024 with one of the themes being sharing the experience of opening and maintaining a local authority specialist resource base. The workshops were well received by schools hoping to host provision in the future and has resulted in several new schools approaching the Inclusion Service for a discussion about future opportunities.
10. The demand for emotional health and wellbeing specialist places for primary learners has increased significantly over the last 5-10 years.
11. The information included in the consultation document provides an appropriate overview of the increase in demand city wide, evidencing the increased need for places in the past five years and the projected increase in future years taking account of the changes to pupil populations and the recent trend.
12. There is a need for more locally based specialist provision to ensure children can access the support they need in their local area. The proposals have been brought forward in order to increase the number and distribution of specialist resource base places across the city.
13. The proposed changes in the primary age phase would increase the overall number of placements for emotional health and wellbeing from 90 places to 114 places from September 2024.
14. The proposed change in the secondary age phase would increase the number of placements for emotional health and wellbeing places by 20 from September 2024.
15. Demand for places continues to be kept under review and further proposals will be brought forward as required.
16. The majority of 'out of county' placements are day placements in the local independent sector. In January 2024 there were 207 placements of this type with

98% of these placements for learners who would be well-placed in a maintained special school or specialist resource base if there were sufficient places available.

17. The reliance on the independent sector therefore reflects a shortfall in maintained specialist provision in Cardiff. The average cost of an independent placement is at least twice the cost of a similar placement in the maintained sector, so increasing Cardiff maintained places is a more cost-effective approach to meeting learner needs. The Council also considers that standards and quality of provision are more consistent and reliable in the maintained sector.
18. The demand for specialist provision at secondary level is always higher than at primary phase. The Council believes this is likely to be the case in any Local Authority area as it arises from the changing needs of learners with additional learning needs identified over the course of their education.
19. Learners with a complex range of needs may need a specialist placement at some point in their education journey, but the age at which an individual learner would need to transfer varies according to individual needs and strengths. Many pupils are placed in a specialist setting at Reception, but many more will transfer at a later point, depending on their needs. The transfer may occur at any point in the educational journey. A proportion of learners with very complex needs will be successfully included in a local primary school but will require a more specialist setting on entry to secondary school. The population in specialist placement in Cardiff is therefore 'top heavy' as each cohort grows in size year on year.
20. Specialist provision for learners with emotional health and wellbeing needs provides a small class, nurturing environment, with a curriculum informed by THRIVE and Nurture principles. Increasing places will ensure that more learners who are struggling in a mainstream setting will benefit from access to small class therapeutic setting, where the focus is on emotional wellbeing and readiness to learn. The Emotional Health and Wellbeing Team works closely with all settings to support transition to the wellbeing classes/ Specialist Resource Base, and reintegration to their local school once the learner is ready to return. The team also facilitates professional learning across the network, with schools sharing and developing practice together.
21. The provision of wellbeing classes, specialist resource bases and special school places is part of the wider context of the continuous development of whole school inclusive practice. The majority of Cardiff schools run nurturing provision for their pupils. ELSA, and THRIVE/ Trauma Informed Schools practice are embedded across the city. The emotional health and wellbeing team provides training and support to all schools and fosters the sharing of practice across all schools.
22. The current approach to mainstream and specialist provision is regarded as successful and effective, resulting in improved outcomes for learners. There is a strong focus on continuous improvement, both at individual school level and strategically through the Whole School Approach to Emotional Health and Wellbeing. The Council did not therefore consider changing this approach, although there is a clear need to increase specialist capacity.

23. The range of proposals consulted on focus on supporting pupils in mainstream schools, where this is appropriate, and on sustainable growth of established and successful specialist provision.
24. The overall increase in provision, to more closely match the projected need for places, would allow a greater number of learners to be placed in provision that is within or closer to their local community and would reduce travel time.
25. Alternative options to establishing specialist resource base places for children with emotional health and wellbeing needs at the schools identified, and set out for each proposal within the consultation document, could include:
  - Do nothing – however, there are not enough specialist places in Cardiff. An expansion of in-county provision would provide a more efficient and effective use of the Council's financial resources than reliance on places in independent schools.
  - The establishment of new specialist provision on other school sites and/or a different number of places in the current or proposed bases.
26. Standards at the schools subject to proposals are good and the schools have a proven track record of high-quality support for learners with Additional Learning Needs. The location of the schools also supports the distribution of emotional health and wellbeing needs places across the city and there is scope to develop the required accommodation within the existing buildings.
27. The proposals put forward are therefore considered to be a preferred option.
28. The Council follows guidance set out in Learner Travel Wales in relation to home to school transport. In the first instance, the distance criteria are applied. However, for learners attending specialist provision, home to school transport is considered on an individual basis and is agreed if this is necessary in order for the child to access their named school. This is in accordance with the statutory duties set out in Learner Travel Wales.
29. Specialist settings make their own flexible arrangements to ensure learners can access pre and/ or after school provision.
30. Decisions regarding which pupils would be proposed to attend the newly established provisions would be made on an individual basis. It is not anticipated that learners will transfer from existing specialist settings unless this is requested by their parents. The majority of learners begin in a mainstream class and transfer at an appropriate point to specialist education. High quality planning and support for transition is well established in Cardiff and is tailored where necessary to the specific needs of parents and learners.
31. The criteria for an Emotional Health and Wellbeing Specialist Resource Base placement include:
  - All children placed at the base have an Individual Development Plan (IDP)

- Parents' consent to specialist placement
  - Evidence of significant emotional health and wellbeing needs
  - Potential for mainstream reintegration to a local school
  - Clear evidence that the child's needs cannot be met in a less specialist placement with appropriate support.
  - Consultation with the school
32. The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Individual learners with additional learning needs would only be impacted by the proposed changes at the point they are admitted to a specialist setting.
33. Cardiff schools have well-established processes for planning and supporting transition between settings. The Council continues to work with schools to identify appropriate transition arrangements for pupils with additional learning needs. The arrangements are dependent on individual need and are progressed as required. The pupil's current and proposed schools work with the learner and their family, and any other specialists who may be involved, to ensure the child or young person is well-prepared and experiences success. This process will be the same, whether the learner is admitted to an existing specialist setting or a newly opened setting.
34. The Council provides a range of specialist support to schools including specialist staff, CPD support for staff development, ALNCO forums, cluster ALNCO meetings, termly additional learning needs updates for Headteachers and regular updates for governing bodies. The proposed changes would be planned carefully so that the school's leadership and governance are not disrupted, which could have a negative impact on educational standards.
35. The accommodation requirements to allow the for the establishment of specialist resource base provision have been agreed in principle with the relevant governing bodies. The Council has developed a specification for resource bases that can be adapted for various setting and will work with schools to identify appropriate locations within the existing buildings with appropriate investment to ensure that the facilities are fit for purpose. The schools identified within the set of proposals either already host wellbeing provision on a temporary basis, or have been identified as having sites suitable for accommodating a base with investment where necessary.
36. Further information regarding staffing levels, appointments and professional learning opportunities has been provided as part of the consultation meetings held with individual schools. A summary overview of staffing and resourcing requirement for a Primary Emotional Health and Wellbeing Specialist Resource Base is as follows:
- 1 teacher, 2 Grade 4 Teaching Assistants, 1 Midday Supervisor per class of eight pupils
  - All posts are fully funded and include an ALN allowance
  - ALN resources (currently £500 per pupil)

- Staff are employed by the governing body, and are subject to school policies
  - Inclusion Service play an advisory role on appointment of teachers
  - LA provide a range of professional learning opportunities
  - Education Psychology allocation
37. A summary overview of staffing and resourcing requirement for a Secondary-age Emotional Health and Wellbeing Specialist Resource Base is as follows:
- 20 pupils (places phased in over 2-3 years)
  - 2 teachers, 4-6 TAs at a range of grades to be agreed with the school
  - All posts are fully funded and include an ALN allowance
  - ALN resources (currently £500 per pupil)
  - Staff are employed by the governing body, and are subject to school policies
  - Inclusion Service play an advisory role on appointment of teachers
  - LA provide a range of professional learning opportunities
  - Education Psychology allocation
38. It is anticipated that there would be a positive impact on the Welsh Language as a result of these proposals.
39. The proposals directly respond to the Welsh in Education Strategic Plan (WESP) Outcome 6 - An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN).
40. The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.
41. The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.
42. A 20 place specialist resource base for learners aged 4 – 11 with complex learning needs and autism spectrum condition was established at Ysgol Gymraeg Pwll Coch in September 2018.
43. A specialist resource base for learners with Autism Spectrum Condition aged 11 – 19 was established at Ysgol Gyfun Gymraeg Glantaf in September 2023. The school also has a specialist resource base for learners with complex learning needs.
44. The Council monitors demand for additional learning needs provision and the patterns of take-up in Welsh medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.

45. When considering the potential for impact on the wider community as a result of the proposed changes, the following are taken into account: Public Open space, parkland, the current use of the school facilities by the community, noise and traffic congestion.
46. The schools that might be affected by the proposals are existing schools. They offer a range of school activities, and some have community organisations offering services from the school. The views of the schools and the wider community on any potential impacts were sought as part of the consultation and any issues raised have been considered as part of the post consultation analysis process.
47. The proposed provision at Ysgol Gymraeg Pwll Coch and Ysgol Gyfun Gymraeg Plasmawr would be through the medium of Welsh.
48. Estyn's view regarding the inclusion of Additional Learning Needs information from the most recent Estyn inspections is noted.

### **Albany Primary School Governing Body**

49. The Albany Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - *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
  - *The lack of EWB provision for primary aged pupils with emotional health and wellbeing needs in Cardiff continues to have a range of significant impacts on our school, including impacting how we use space in the school, impacting staff welfare and retention and impacting the wellbeing of pupils. An example would be a pupil waiting over two years for a placement which had an extremely significant impact on the child's wellbeing and wider family.*
  - *We welcome the increase in provision – it is much needed and will help to ease pressures on schools such as ours. However, we do not feel the provision will be sufficient for the numbers of children who need support across the city.*
  - *There will be risk of further increase in demand due to school budget pressures and the freeze on ALN funding and not being able to apply for*



*additional funding leaving schools with lower levels of staffing to manage complex needs.*

- We support proposals to improve facilities for prevention and early intervention in primary and secondary schools, including flexible spaces to allow for smaller classes and for setting up in-house nurture arrangements and internal exclusion.*
- It is fundamentally important that provision is fit for purpose for all pupils that need it. There needs to be planned provision for girls as part of this consultation – we would like to better understand how this will be addressed. For example, will some of the new Specialist Resource Bases be focused on meeting the needs of girls? How will you ensure that the new units accept a balanced proportion of girls as well as boys?*
- With mental health challenges becoming more complex there are a significant number of girls with complex needs across the city and there needs to be sufficient provision not just in number of places but also for peers of the same gender. Many provisions explored by families are very boy dominated which can be intimidating for girls or parents when exploring provisions.*

### **Appraisal of views expressed**

50. The Council welcomes the Governing Body's support for the proposed changes.
51. The proposals have been brought forward to address the need for increased specialist provision, both to meet the needs of children and to reduce the pressures on schools.
52. Cardiff schools are highly inclusive, with excellent practice to meet the needs of the vast majority of children, but it is essential to increase capacity to cater for the small but growing number of children who require access to a more specialist setting.
53. All wellbeing classes cater for both boys and girls. The development of new and expanded primary specialist provision will ensure appropriate facilities to allow for equitable provision for boys and girls.

### **Baden Powell Primary School Governing Body**

54. The Baden Powell Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?*

Yes.

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

*Baden Powell Primary School*

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

Yes.

- *Would you like to suggest any changes or alternatives?*

No.

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

### **Appraisal of views expressed**

55. The Council welcomes the Governing Body's support for the proposal.

### **Baden Powell Primary School Headteacher**

56. The Baden Powell Primary School Headteacher submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

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

Yes.

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

Yes – support the following:

*Baden Powell Primary School*

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

*Fairwater Primary School*

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

*Lakeside Primary School*

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

*Springwood Primary School*

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

*Ysgol Gymraeg Pwll Coch*

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

No opinion on the following:

*Herbert Thompson Primary School*

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

*Ysgol Gyfun Gymraeg Plasmawr*

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

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

- *Baden Powell - We developed an 'in-house' well being class in response to pupil need in 2021. This has been successful in meeting the needs of our pupils and has impacted positively on pupils both in the wellbeing class and in the mainstream classes.*
- *Fairwater Primary School, Lakeside Primary School, Springwood Primary School, Ysgol Gymraeg Pwll Coch – This would replace the existing wellbeing class.*

*Would you like to suggest any changes or alternatives?*

*No, I agree with the proposed changes.*

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

### **Appraisal of views expressed**

57. The Council welcomes the Headteacher's support for the proposal.

### **Fairwater Primary School Headteacher**

58. The Fairwater Primary School Headteacher submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

- In terms of the SRB it is very much welcomed by myself, I think this provision will afford more responsive needs of individual pupils being met. For example, I fully support that the pupils access the SRB for as long as they need to rather than following a time scale that was previously in place*
- Our current provision/ site does not have an outdoor secure space for the children to access. This would ensure further outdoor development opportunities it would safeguard our pupils. We also have an unused toilet block that I would welcome being turned into a sensory room for supporting the needs of the pupils - this would mean investment, again, from the Local Authority.*
- I ask as the Headteacher that we are afforded the opportunity by the Local Authority to recruit an additional staff member so that we can increase our pupil capacity. I would recommend funding for a HLTA so that greater impact can be achieved.*

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

### **Appraisal of view expressed**

59. The Council welcomes the Headteacher's support for the proposal.
60. There has been significant recent investment in the facilities of the wellbeing class at Fairwater Primary School. The Council will continue to work with the Headteacher and Governing Body to ensure improvements continue as appropriate, including consideration of staffing needs, pupil numbers and development of the facilities.

### **Herbert Thompson Primary School Governing Body**

61. The Herbert Thompson Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

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

Yes.

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

*Herbert Thompson Primary School*

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

Yes.

- *The Governing Body welcome the proposals to establish a specialist resource base at Herbert Thompson Primary School to service the needs of the Ely and Caerau children. We believe that this is a provision that is very much needed within this community.*
- *We support the establishment of the specialist resource base within the existing school buildings but reiterate the findings of the initial survey of the site that the only suitable existing building would be the former boxing club building, but that this building will require extensive refurbishment to be a suitable space for the resource base.*
- *It is our hope that the specialist resource base will be fully resourced and sustainable to support the community for many years to come. We*

*welcome the proposal that the resource base will have a phased recruitment of pupils to allow time for procedures within the base to be embedded.*

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

### **Appraisal of views expressed**

62. The Council welcomes the Governing Body's support for the proposal.
63. The accommodation requirements to allow the for the establishment of specialist resource base provision at the school have been agreed in principle and the Council will work with the school to ensure that the facilities are fit for purpose.
64. The proposed Specialist Resource Base on the Herbert Thompson Primary School site may be accommodated within the building formerly used as a boxing club, following investment to convert the building. Alternatively, pending the outcome of feasibility works currently underway, the base may be accommodated within a new build facility replacing this building. It is acknowledged that significant work would be required to develop or replace this accommodation, and in recognition of this it is proposed that the start date for the specialist resource base provision should be from September 2025.

### **Lakeside Primary School Governing Body**

65. The Lakeside Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
- *Do you support the plans put forward to improve the provision for Children and Young People with additional learning needs?*  
  
Yes.
  - *Do you support the proposal for each of the school sites?*  
  
Yes – support the proposals; support proposals relating to Lakeside Primary School with amendments.
  - *Lakeside Governing Body supports the proposed changes in principle.*
  - *To clarify, pupils need to remain dual-registered throughout their time in the provision.*
  - *The governing body, leadership team and staff as a whole are fully committed to continuing the high-quality provision that currently characterises the wellbeing provision at the school. We are committed to*

*ensuring that this continues assuming the transition to a formalised SRB provision takes place.*

- We consider that the classes at Lakeside represent an 'invest to save' where the intensive therapeutic provision has clearly demonstrated value for money and has enabled the children to engage much more effectively with learning given their complex starting points. We are sure that the council recognises that the provision of an SRB is founded on the belief that it is much more effective to intervene to meet the needs of these most vulnerable learners before their challenges increase significantly. If this is not done, the risk that more substantial and costly intervention will be needed in the future as these young people grow older is heightened.*
- Although the class has always (on paper) been allocated 16 pupils, we have never had that many. The highest number being 12 attending at one time (we have 14 on our books currently but only 12 attend).*
- The school and the governing body have concerns about increasing the number of children attending the class, at the current high level of emotional, health and wellbeing needs that we are experiencing with our children and families, particularly since the Covid pandemic.*
- There is considerable stability in the staffing of the provision which has contributed to excellent teamwork and a strong commitment to each and every child. We believe that this has been a critical factor in its success. It has led to the building of excellent relationships with the families of the children concerned. This has proved so important in underpinning the quality of relationships between staff and children which is such a strong characteristic of the provision as it currently stands.*
- The current staffing complement (7) for 12 children is critical to allowing a high -quality provision to continue. All of the children in the provision require one to one support during much of the day. This is because they need an adult to co-regulate with them and to keep themselves and others safe.*
- Pupils need support to continue making progress in areas that are foundations for effective learning e.g., self-regulation, relationships and feeling safe in school. Pupils require a predictable educational environment that is underpinned by the principles of attachment and nurture.*
- Key adults need to be emotionally and physically available, attentive and attuned to pupil's needs. Pupils require access to wider therapeutic support to enable them to process some of their experiences in a safe therapeutic space.*

- *Toileting needs - Intimate health and/or continence needs of children (for example, toileting support requires 2 staff members per child). The setting has one changing room equipped with a shower.*
- *Physical space - Children in the setting find relationships with other children challenging and need space. Sometimes they are able to work/play in twos, but rarely higher numbers. Staff model positive relationships between children. This often includes supporting distressed / dysregulated behaviour or interactions between children and helping them to return to their window of tolerance.*
- *Learning and therapeutic areas - The two classes are set up to allow rooms to be both therapeutic and learning environments with break out spaces and room for 1:1 sessions.*
- *Calming areas – we have two, beautiful, soft play rooms which are used for de-escalation / calming areas which are in constant use. Staff use these rooms to co-regulate with the children, usually on a 1:1 basis. These are also used to deliver ‘relationship-based-play’ activities and trauma informed therapeutic activities.*
- *Outdoor space – this is limited as a free flow activity on the decked area. There is one small climbing frame that around 2-3 children can use at once. Children are able to access the wider areas of outdoor space across the school, but this requires a high adult-pupil ration to be successful and keep everyone safe.*
- *Transport - We do not have a dedicated taxi drop off area. A potentially unmanageable increase in practical logistics such as transport, transition within the school building (currently all 7 staff are placed in various positions according to our traffic management plan, to enable children to transition safely between classroom and taxis, e.g. gate duty, transitioning children from taxis into the building, etc).*
- *Multi-agency working e.g. visitor, meetings, conferences – to fully support children and families, there are a large number of meetings which are arranged by external parties and that take place within school hours. These always require attendance by one and sometimes two members of staff.*
- *Paperwork, such as IDPs – all pupils in the setting have a large amount of detailed and individual information and legal paperwork, such as IDPs, PCP meetings, Court documents and health care plans. These are high quality and need to be maintained on around a half termly basis, alongside yearly provision reviews and often, applications for future specialist provision.*



- *The Wellbeing Class, families, children and staff, all form part of Lakeside Primary School and are part of everything we do. As a result, the class, with high numbers of multi-agency working, including safeguarding, health and safety, ALN needs and logistical daily planning, requires support and time from the senior leaders of the school, including the Headteacher and ALNCo. This would increase if the provision were to grow in number.*
- *It was suggested at the consultation meeting that reduction in children could affect the level of funding that the class receives. Reducing the funding will obviously affect the staff>child ratio, the safety of the children, the traffic management plan, resources for the children, Health & Safety, and staff wellbeing. The current staffing complement for 12 children is critical to allowing this high -quality provision to continue.*
- *We have identified significant risks with reducing the pupil to staff ratio and that these put at risk Cardiff's 2030 Learning Entitlement's Vision: specifically, it risks children's ability to "thrive and fulfil their potential" and "realise their dreams and ambitions"*
- *We are keen to work together with the LA and other Wellbeing Classes / SRBs to make Cardiff a beacon of excellent practice for our emotional health and wellbeing children. We seek discussions around the points we have raised in order to get this right for our pupils across the city.*
- *Changes to the proposed number of 16 down to 12 (with the current level of need) yet retaining the current funding levels.*
- *If the Lakeside Wellbeing provision is to continue its excellent work and its current level of successful outcomes, the funding level must remain as it is currently. Such is the nature of the class that staff have to be ready at all times to deal with the unexpected (dysregulation, incontinence, safeguarding disclosure or discovery) alongside planning in the high level of correspondence, paperwork, meetings, logistics, and visitors/visits. At a higher pupil>staff ratio, we have concerns that there will be negative impacts on learning, pupil and staff wellbeing, Health & Safety, and positive outcomes.*

### **Appraisal of views expressed**

66. The Council welcomes the Governing Body's support for the proposal.
67. The proposal allows for dual registration where this is considered to be the most appropriate option. There would also be the option for pupils to be placed on the roll of the school.
68. There has been significant recent investment in the facilities of the wellbeing class.

69. The request of the Governing Body to reduce the formal number of places at the specialist resource base from 16 to 12 is noted. The Wellbeing Class provides for Foundation Phase children and the number of places in each class is consistent with current and proposed Foundation Phase Wellbeing classes in other bases city-wide. Any change to the proposed number would need to be considered with the context of provision at other schools and the implications for funding and staffing levels.
70. It is acknowledged that admitting no greater than 12 learners to the class at this time is appropriate in recognition of the age, needs of children and the level of support required. The school host a two class base of Foundation Phase learners, including learners who may otherwise be eligible for placement at the Ysgol Cynefin (formerly known as The Court Special School).
71. The Council is progressing the proposed expansion of Ysgol Cynefin which will support some of Cardiff's most vulnerable learners when expansion is complete. It is anticipated that this expansion will reduce the pressure on Cardiff's Wellbeing Classes and Specialist Resource Bases, allowing Lakeside Primary School to admit to its planned 8 learners per class, consistent with the established model city-wide.
72. The Council will continue to work closely with the Headteacher and Governing Body of Lakeside Primary School to ensure the high standard of provision is maintained including consideration of the needs of learners place, funding, staffing and resources. It is therefore proposed to retain an admission number of 16 with admissions to the base managed in consultation with the school allowing for the needs of children already at the base and those proposed for admission.
73. The Council will arrange for reassessment of the existing car park facilities and current arrangements to enable identification of potential options for suitable facilities for drop-off and pick-up by the dedicated school transport at an appropriate, convenient and safe location.

### **Springwood Primary School Governing Body**

74. The Springwood Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - *On behalf of governors at Springwood Primary School, we accept the proposals as outlined and discussed as part of the presentation. We understand all resources to run the Unit, will be provided from central budgets.*
  - *We have had a Wellbeing Class in our school for a number of years, and so the proposal does not mean a major change for us.*
  - *It is good to see lots of effort being put in to help and support those young children who need addition provision and congratulations for making this happen, despite pressure on budgets.*

### **Appraisal of views expressed**

75. The Council welcomes the Governing Body's support for the proposal.

### **Ysgol Gyfun Gymraeg Plasmawr Governing Body**

76. The Ysgol Gyfun Gymraeg Plasmawr Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

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

### **Appraisal of views expressed**

77. The Council welcomes the Governing Body's support for the proposal.

### **Ysgol Gyfun Gymraeg Plasmawr Headteacher**

78. The Ysgol Gyfun Gymraeg Plasmawr Headteacher submitted a response which included the following points: (a copy of the full response can be seen at Appendix 8)

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

- *The decision to locate the SRB at Ysgol Plasmawr builds on our longstanding work with EHW pupils and reflects the strengths in pastoral support noted in our recent Estyn inspection.*

### **Appraisal of views expressed**

79. The Council welcomes the Headteacher's support for the proposal.

### **Ysgol Gymraeg Pwll Coch Governing Body**

80. The Ysgol Gymraeg Pwll Coch Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

- *In 2022, the Governing Body and Headteacher agreed to open a Welsh-medium Wellbeing SRB at Ysgol Gymraeg Pwll Coch. We are proud of our inclusive ethos as a school, and when we agreed to open a temporary wellbeing class, we were keen to build on this success. We are also of the opinion that having such Welsh-medium provision in Cardiff is vital, and we were happy to support the LEA with the temporary plan.*
- *However, despite the considerable efforts made by the Headteacher and staff in the SRB, the wellbeing provision is not working effectively and is now a serious cause for concern. These reasons have been presented by the Governing Body to LEA officers in a separate document.*
- *After very careful consideration, it is with great regret that the Governing Body of Ysgol Gymraeg Pwll Coch has to make it clear that it cannot support the formalizing, or even the continuation of the Wellbeing SRB at the school. We are certain that the school and its staff have made every effort possible to ensure the success of the base over the past year. However, for the reasons included in the document, it is regrettable that it cannot become a permanent option.*
- *We are grateful for the extensive discussions between the school and LEA, especially ALN and SOP officers, during the past two weeks. We note the council's acceptance of the Governing Body's decision that plans to establish a well-being class at the school cannot continue.*
- *We look forward to working in close partnership for the benefit of all pupils in the future.*

### **Appraisal of views expressed**

81. The support of the Headteacher and Governing Body of Ysgol Gymraeg Pwll Coch in setting up and hosting a Wellbeing Class for primary-age learners in Welsh-medium is welcomed. The provision has supported several children to continue in Welsh medium education whose needs required this specific provision. The school has shown the capacity and willingness to innovate, in

order to ensure learners in the sector have equitable access to nurturing, therapeutic support, in the language of their choice.

82. The Council acknowledges the school's concerns and their wish to discontinue the provision. It is therefore proposed to not proceed with the formalisation of the Wellbeing Class as a specialist resource base at this time and to develop alternative options to meet the needs of children in the Welsh-medium sector.
83. The Council will continue to work with the school to address issues and to identify appropriate provision for the children currently enrolled in the Wellbeing Class.
84. The points raised during by the Governing Body during the consultation will be further appraised prior to bringing forward revised proposals for the provision of Welsh-medium emotional health and wellbeing primary school places.

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

85. RhAG - Rhieni Dros Addysg Gymraeg (Parents for Welsh Medium Education) submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - *It is good to see that Welsh Language Education is addressed in this consultation and that new provision is proposed for Ysgol Pwll Coch and Ysgol Gyfun Plasmawr. This is a significant improvement on the very poor situation in the past as no such provision has existed for learners in Welsh language education before temporary classes opened.*
  - *How will you assess the size and capacity of the Welsh-medium Additional Learning Needs (ALN) workforce and use the results to plan the workforce in this sector?*
  - *Are you engaging with parents/carers to ensure they understand the provision and the support available through the medium of Welsh?*
  - *The overall increase in provision, to align more closely with the projected need for places, would enable a larger number of learners to be placed in provision within or closer to their local community and reduce journey times. This is a bit of a generalisation as this is not necessarily the case for Welsh language education learners as some may have to travel across the city from the east in order to reach Pwll Coch and Plasmawr Schools.*
  - *We wish to note our serious concern that the consultation continually states that "schools need to understand their responsibilities and that of the governing body" in maintaining the provision, but there is no information about how prepared the schools are in practice or how the schools are going to acquire the expertise to be able to provide the specialist maintenance for these learners from the Local Authority. We would like answers to the following:*

- *What is the role of the Local Authority in this regard as they are responsible for this statutory area?*
- *What professional training do current staff need to be able to provide this specialist service?*
- *Is there a mapping exercise to show the range of training available in Welsh and the number of staff in school who have already received it or want the training. It would not be fair or legal to expect a school to start providing a specialist service like this without the expertise.*
- *In the case of Ysgol Pwll Coch, we also note our concern that there is insufficient information in the consultation about the implications of placing 8 children within the 5-11 age range with intensive wellbeing and emotional needs within the same class.*
  - *What is the appropriate staffing level for this?*
  - *How many teachers will be in class with these learners so that the education suits the age and needs of the learners? There is no information about this in the document and it is information that should be available for parents and carers of school learners to consider before starting.*
  - *How many specialist assistants will be in class?*
- *In the case of Ysgol Plasmawr will the 20 places be for ages 11-19? If so, the above questions and more come up again for this school?*
  - *What is the appropriate staffing level for this?*
  - *How many teachers will be in class with these learners so that the education suits the age and needs of the learners? There is no information about this in the document and it is information that should be available for parents and carers of school learners to consider before starting.*
  - *How many specialist assistants will be in class?*
  - *What will the provision look like from year 10 when the exam subjects are chosen by the learners? How will the support happen then?*
- *There is a misconception in the last box on page 69 which states that Ysgol Gyfun Plasmawr falls under the category of Welsh community primary school.*
- *You note about staffing costs with no sums in this consultation, but what about the specialist ongoing training costs and for the Welsh language*

sector? Has consideration been given to the need for training staff in Welsh-language schools where there is a need to consider the linguistic background of learners in supporting them in these provisions and the fact that the field is one with a shortage of specialist resources in Welsh?

- *It must be remembered that the WESP requirement now asks for Local Authorities to spur the demand for Welsh language education. As numbers in Welsh language education increase then more learners come to our schools with a wider range of needs. They must be ready from the outset to support them and not to respond to every request. To spur the demand the proposal for Welsh language education must become a real choice for parents by being able to see clearly what the offer is for their child – whatever the need. Detailing the range of support available to learners on websites, on school and Local Authority social media accounts while also detailing the nature and breadth of specialist training and support school staff receive from the Local Authority, is essential.*
- *This consultation is not an easy proposal to measure the impact on the Welsh language in terms of Welsh language standards as it includes proposals for Welsh and English medium schools. We understand the reasoning behind coupling the proposals in this way as it draws proposals similar in nature of provision together. However in doing so, it has taken one key thing for granted which is that provision is as well established in the Welsh schools as it is in the English schools.*
- *We know that this is not the case from our work with outcome 6 of the Welsh Education Forum. And so, we would have liked to have seen an impact measure on the Welsh and English language school schemes separately because there are differences in the effects between the two.*
- *We are not entirely convinced that you have complied with the Welsh Language Standards which should have received detailed consideration as part of this consultation. We particularly note standards 91, 92 and 93 which are the standards relating to consultation.*
- *We have identified the words in bold in the above standards which we think require further consideration namely consider and seek opinions regarding the effects. There was no opportunity to do this specifically, although there was room in the questionnaire to comment freely.*
- *We would suggest that there are negative impacts and risks such as*
  - *Learners having to travel farther than their nearest Welsh language school and therefore lose contact with friends if they had to move to the specialist class.*
  - *Risk of moving into English education in the above connection and therefore potentially losing the Welsh language. This would have an impact on the WESP's targets and on the sustainability of the provision.*

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

### **Appraisal of views expressed**

86. Development of a specialist workforce is embedded in the development of additional learning needs knowledge and skills for the whole Welsh medium workforce in schools, and opportunities for further development for staff working in additional learning needs support roles. The Council provides a wide range of professional learning opportunities in relation to additional learning needs, ensuring this is accessible to staff from both English and Welsh medium sectors. Educational Psychologist and specialist teachers work closely with classroom and staff in schools, advising, coaching and supporting. They provide a range of courses that can be delivered to the whole school, to groups of staff and to individuals.
87. Specialist staff are often recruited from the mainstream workforce, having developed an interest in the area, and having demonstrated sufficient experience in supporting learners with additional learning needs. The Council supports schools in relation to appointments and advises on a professional learning plan for staff, whether they are new to specialist role, or have previous experience. This approach to workforce development is the same for both the Welsh and English medium sectors.
88. Details of how the Council proposes to increase the number of teaching/support staff able to teach Welsh (as a subject) and teach through the medium of Welsh are outlined in the adopted Welsh in Education Strategic Plan (WESP) (Outcome 7).
89. A copy of the Welsh in Education Strategic Plan can be viewed at [www.cardiff.gov.uk](http://www.cardiff.gov.uk)
90. The Council's Inclusion team continue to work alongside admissions and families to ensure parents and carers are aware of the provision and support through the medium of Welsh. This includes regular review of the information provided in the admissions booklet, options for support set out on the Council's website and through the establishment of Individual Development Plans.
91. Parents/carers are always involved in any decision to place their child in a more specialist setting. The child's school and specialists working with the school will explain the options to parents, support them to visit the settings, so they can offer an informed opinion as to the best next step for their child.
92. The Council's Inclusion Service works very closely with schools who are developing or hosting specialist provision. The responsibility and budget are



delegated to the Governing Body, but specialist staff support and advise on appointments and development of a specialist curriculum. The service facilitates a range of professional learning opportunities, including sharing of practice between schools.

93. The concerns regarding age range and number of places are noted and consideration will be given as to whether this is appropriate, or whether staffing and place number need to be reconsidered.
94. The standard staff/pupil ratio for a wellbeing class is a teacher and two teaching assistants for a class of 8. This is kept under review and can be varied where the needs of learners would require this.
95. The 20 places at Ysgol Gyfun Gymraeg Plasmawr would be for KS3 and KS4 learners. Every learner in the base would have a Post 16 Transition plan from age 14, to ensure an appropriate learning pathway. Where appropriate, this would include the option of continuing at Ysgol Plasmawr for Post 16 education.
96. In common with several other resource bases in Cardiff, pupils would not be taught in discrete classes but would benefit from a bespoke programme of learning that includes supported access to mainstream learning, complemented by supported learning and interventions in the base. This ensures that each learner can access a range of subject choices.
97. The standard staffing for a secondary base of this type includes two teachers and a number of teaching assistants, which may vary according to the range of needs. however, as above, learners will also have access to learning in mainstream classes.
98. Ysgol Gyfun Gymraeg Plasmawr is a Welsh-medium community secondary school.
99. Cardiff Inclusion Service has a well-established programme of workforce development/ ALN professional learning in place, which includes training and development for classroom staff; for ALN specific staff and for specialist staff. This includes advice and support from specialist staff who are Welsh speakers and have significant experience of teaching in the Welsh-medium sector.
100. Cymraeg 2050: A million Welsh speakers' is the Welsh Government's strategy for the increasing the use of the Welsh language. It sets out the long-term approach to reaching a target of a million Welsh speakers by 2050.
101. All Local Authorities in Wales are required to publish a Welsh in Education Strategic Plan. Within their plan, they must set a ten-year target for the expected increase in Year 1 children who are taught in Welsh. The target set for Cardiff by the Welsh Government is between 25% and 29% of Year 1 learners are educated in Welsh by 2031. At present, this figure is around 18%.
102. Cardiff is committed to achieving a scale of growth in line with the 25 – 29% target as provided by the Welsh Government; however, the local target must balance

ambition with an understanding of the prevailing trends, which includes falling birth rates and heightened uncertainty relating to school admission choices due to the pandemic.

103. The number of places currently available through the medium of Welsh would not be sufficient to support an increase in take up that would meet the targets set out by the Welsh Government.
104. Cardiff's Welsh in Education Strategic Plan (WESP) sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English-medium education all will have the opportunity to become confident in speaking Welsh.
105. The approved WESP commits to ensuring city wide capacity in the primary Welsh-medium sector at 10% over and above the projected intake at Reception to support growth and allow for in-year admissions and flexibility for transition.
106. Outcome 6 of the WESP commits to an increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018).
107. A strategic approach to developing specialist ALN provision has been developed to enable the LA to plan for the future of ALN provision within the Local Authority, to understand our current resource availability and to address need in the medium and long term.
108. To achieve this outcome and ensure high quality additional learning provision for all pupils in Welsh-medium education who have or may develop additional learning needs, in the first 5 years the Council will:
  - Further develop the range of professional learning opportunities in relation to ALN to build capacity of the Welsh medium workforce to identify and meet a range of additional learning needs.
  - Continue to support a range of approaches to early intervention and support across all Welsh-medium schools, to ensure equal linguistic opportunity.
  - Provide information and advice for children and young people and their families, ensuring school and Council websites include information about how additional learning needs are identified and addressed in our Welsh-medium schools, including information about specialist provision.
  - Regularly seek the views of learners and their families about the effectiveness and impact of additional learning provision to 'keep additional learning provision under review'.

- Monitor requests for transfer from Welsh-medium schools into the English-medium sector in the city and undertake further research where those that opt out of this sector have ALN IDPs in place to ensure an improved understanding of concerns appropriate reassurance and support is provided with a view to reconsideration to remain.
- Review the impact of the Welsh-medium primary Wellbeing Class and the secondary 'virtual Specialist Resource Base' for pupils with emotional health and wellbeing needs along with considering the learning and implications for future development of specialist provision in the sector.
- Review Welsh medium 'Stage 3 and Stage 4' provision as part of a city-wide review, to determine how best to further improve early intervention and prevention of ALN.
- Develop and deliver an increased number of secondary specialist places to be delivered in specialist resource bases 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.
- Develop and deliver an increased number of primary specialist places to be delivered in specialist resource bases in at least three primary schools that promote to the relevant secondary schools.

Over the next 10 years the Council will:

- Deliver further ALN SRBs on primary sites as large residential LDP areas develop.
- Work with partners in Health to improve access to therapy support and advice through the medium of Welsh.
- Work with Welsh Government and other partners to improve access to assessments and resources in the medium of Welsh.

109. The views expressed regarding the Language Standards have been noted and will be reflected in future consultations.

110. It is acknowledged that children accessing Welsh-medium provision may have to travel further as there are currently fewer Welsh-medium schools than English-medium schools. However, whilst providing a greater geographical spread of specialist on mainstream classes delivered through the medium of Welsh remains a target, the timing of this development must also consider the needs of learners who would potentially have reduced social interaction with peers in a base if there were fewer pupils in each.

111. As set out in the WESP, the Council is committed to increasing the number and distribution of additional learning needs places across the sector, monitoring requests for transfer from Welsh-medium into the English and developing an

improved understanding of concerns, appropriate reassurance and support with a view to reconsideration to remain.

112. Under these proposals there are no plans to change the Council's policy on the transport of children to and from schools.
113. There is a statutory legal obligation on the Council to provide free home to school transport to primary school pupils who live 2 miles or more from the nearest suitable school and secondary school pupils who live 3 miles or more from the nearest suitable school, as measured as measured by the shortest available walking route.
114. Any pupils affected by this proposal would be offered the same support with transport as is provided throughout Cardiff and in accordance with the same criteria that apply across Cardiff. The Council's transport policy can be viewed on the Council's website [www.cardiff.gov.uk](http://www.cardiff.gov.uk).

### **Other responses received**

#### **Demand for places**

115. *More EHW provision is needed in Cardiff. Vital to support children to develop resilience.*
116. *The proposed changes will not be sufficient to meet demand for places across the city.*

#### **Appraisal of views expressed**

117. The current proposals are in addition to previously agreed changes currently being implemented, including the proposals for a new specialist resource base at Cardiff West Community High School, Eastern High and an expansion of Ysgol Cynefin (formerly The Court Special School).
118. The proposed changes in the primary age phase would increase the overall number of placements for emotional health and wellbeing from 90 places to 114 places from September 2024.
119. The proposed change in the secondary age phase would increase the number of placements for emotional health and wellbeing places by 20 from September 2024.
120. Demand for places continues to be kept under review and further proposals will be brought forward as required.

#### **Availability of provision**

121. *Provision must be fit for purpose and capable of meeting the needs of both boys and girls. How will the Council ensure the new units accept a balanced proportion of boys and girls? Many provisions are 'boy dominated' which can be intimidating for girls and families.*

122. *There needs to be a balance in the number of places for boys and girls.*

### **Appraisal of views expressed**

123. All of the proposed Specialist Resource Base provision will cater for both boys and girls. Previous proposals have clarified that provision currently focussed on provision for boys will become mixed settings.

### **Understanding of impact of Emotional Health and Wellbeing**

124. *There needs to be a better understanding of the impact of EHW on learning to ensure consistent positive practice across all schools.*

### **Appraisal of views expressed**

125. There is a wide range of excellent practice established or developing in Cardiff schools as part of the Welsh Government initiative to promote 'a whole school approach to emotional health and wellbeing'.

### **Impact of insufficient staffing on the Wellbeing class at Fairwater Primary School**

126. *Insufficient staffing levels at the Fairwater wellbeing class which impacts on safeguarding, the ability of staff to deliver proactive interventions to support both emotional and academic development, issues at drop off and pick up times with children dysregulating, children joining the class when time is needed to establish trust and routines, the need for intensive support in all areas of the curriculum, the need to protect children who are dysregulating and the other children in the class at the same time, the time needed to liaise with external professionals, Children's Services, Medical Services and parents and the time needed to prepare/review Individual Development Plans (IDPs).*

### **Appraisal of views expressed**

127. The Fairwater Primary School Wellbeing Class staffing model is consistent with other Key Stage 2 Wellbeing Class provision across the city.

128. A summary overview of staffing and resourcing requirement for the proposed specialist resource base is as follows:

- 1 teacher, 2 Grade 4 Teaching Assistants, 1 Midday Supervisor per class of eight pupils
- All posts are fully funded and include an ALN allowance
- ALN resources (currently £500 per pupil)
- Staff are employed by the governing body, and are subject to school policies
- Inclusion Service play an advisory role on appointment of teachers
- LA provide a range of professional learning opportunities
- Education Psychology allocation

129. Staff ratios, skills and experience are kept under review in all settings. A range of specialist services will continue to work closely with the school to ensure all learners' needs can be effectively met.

## **Specialist Provision for Primary Aged Learners with Complex Learning Needs and/or Autism: summary of the responses received and appraisal of the views expressed**

130. The points of view received as part of the consultation are set out in *italics* below and have been grouped according to the points raised where appropriate.

131. The Council's response to each point can be seen underneath, under the heading "Appraisal of views expressed".

132. Formal responses were received from:

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

### **Estyn**

133. Estyn submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)

- *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.*
- *The local authority has set out a generally clear rationale for its proposal. Essentially, this relates to increasing demand, a lack of current provision and better distribution of specialist provision for learners with complex learning needs and/or autism, across the City.*
- *The proposal refers to a lack of capacity in its four special schools and nine specialist resource bases. It also notes that the rebuild and extension of Riverbank Special School will see capacity increase by just over 30 additional places. Table 4 of the proposal [p.14] clearly shows how demand for "specialist placements" has increased, year-on-year since 2017, with 24% more placements being made in 2022-2023 than in 2017. However, it is not clear if this relates specifically to learners with complex learning needs and/or autism, or all learners with ALN in specialist resource bases, including special schools and education other than at school settings [EOTAS]. The proposal goes on to demonstrate that demand is likely to increase by a further 10%, up to 2028.*

- *The 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.*
- *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 proposal does not indicate whether pupils will be dislocated from existing mainstream or specialist provisions and the support, including transition arrangements, that pupils and their parents are likely to need and benefit from.*
- *The local authority does not provide any information on costs in relation to establishing provision and neither does it consider whether there is the need for any building, refurbishment, or adaptation to proposed or existing provision. It is not clear that accommodation within the proposed schools has been identified. As a result, it is not possible to comment on the suitability of accommodation.*
- *The proposal does not provide any information in relation to proposed staffing arrangements or how staff will be supported.*
- *The local authority has not provided a Welsh Language Impact Assessment as part of this proposal.*
- *The local authority has not provided a Community Impact Assessment as part of this proposal.*
- *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 associated 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.*
- *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.*
- *It is not possible to comment on the suitability of the environment as no further information has been provided. It is not clear therefore that the needs of learners with complex learning needs and/or autism, or indeed those with physical or medical needs, have been considered.*
- *The proposal outlines that a staggered approach is taken in admitting learners and that full capacity is not usually met within the first year of opening. This would appear to be a sensible approach and will allow both learners and staff to become acclimatised to the new setting.*
- *The proposal does not provide any information on the curriculum to be followed by learners or whether it is expected that learners will access learning or other activities alongside their mainstream peers.*
- *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.*
- *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 his 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.*
- *With regards to Coed Glas Primary School, 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 proposals provide a high-level overview of the most recent inspection outcomes for the seven schools. However, it does not provide sufficient information on the commentary in relation to additional learning needs [ALN].*

### **Appraisal of views expressed**

134. The Council acknowledges the conclusions of Estyn on the overall merits of the proposals.
135. The Council's Inclusion Service works closely with schools hosting specialist provision, supporting and advising on appointments, the learning environment, and the management of the learning day.
136. Schools new to hosting provision are encouraged and supported to visit existing provision, and to join professional learning forums with specialist staff working in other schools.
137. The consensus from schools currently hosting resource bases is that the experience enhances learning for all pupils, and further strengthens the inclusive ethos of the school and the community.
138. The Council coordinated an ALN Conference on 30th January 2024 with one of the themes being sharing the experience of opening and maintaining a local authority specialist resource base. The workshops were well received by schools hoping to host provision in the future and has resulted in several new schools approaching the Inclusion Service for a discussion about future opportunities.
139. The information included in the consultation document sought to provide an overview of the increase in demand city wide. There is a need for more locally based specialist provision to ensure children can access the support they need in their local area. The proposals have been brought forward in order to increase the number and distribution of specialist resource base places across the city.
140. The proposed changes would provide 60 additional permanent primary age complex learning needs and/or autism specialist places from September 2024.
141. Demand for places continues to be kept under review and further proposals will be brought forward as required.
142. Cardiff schools are highly inclusive settings with very well-established systems and approaches for supporting the vast majority of learners, including those with

additional learning needs with very high support needs. This is widely reflected and evidenced in ESTYN reports and thematic reviews. A nurture approach has significant benefits for many learners who are struggling in school for emotional or mental health reasons. Well thought out, supportive arrangements for 'internal exclusion' can be highly effective in supporting learners who are at high risk of exclusion, to remain in school and develop the behaviours for learning that will enable them to reintegrate to their class at the earliest opportunity.

143. The Council is fully committed to supporting and further developing inclusive practice and rejects any notion that 'internal exclusion' is an appropriate approach to supporting the learning of pupils with additional learning needs. However, there is very well-evidenced and established nationally and indeed internationally, that some learners are best included in learning and supported in their wellbeing by having access to a more specialist setting, with high staff-pupil ratios, access to specialist staff and facilities and a special designed curriculum able to support their complex learning needs.
144. Specialist provision for learners with complex learning needs provides a small class, nurturing environment, with a specialist curriculum suitable for learners experiencing severe learning difficulties. Classes are small, with a high staff/pupil ratio and programmes of learning are tailored to the individual needs and potential of each learner. Specialist resource bases specifically for learners with autism are focussed on enabling learners to access mainstream learning wherever possible, complemented by more specialist support and intervention where required, and ensuring learners' individual needs and potential inform their learning plan.
145. Increasing the number of places will ensure that more learners who are struggling in a mainstream setting will be able to access a more tailored programme of support, taking account of learners sensory and emotional needs, as well as focussed support for social interaction and communication.
146. The current approach to mainstream and specialist provision is regarded as successful and effective, resulting in improved outcomes for learners.
147. The range of proposals consulted on focus on supporting pupils in mainstream schools, where this is appropriate, and on the sustainable growth of specialist provision.
148. These proposals would provide 60 additional permanent primary age complex learning needs and/or autism specialist places.
149. The overall increase in provision, to more closely match the projected need for places, would allow a greater number of learners to be placed in provision that is within or closer to their local community and would reduce travel time.
150. Alternative options to establishing specialist resource base places for children with complex learning needs and or autism at the schools identified could include:
  - Do nothing. There are not enough specialist places in Cardiff. An expansion of in-county provision would provide a more efficient and effective use of the

Council's financial resources than reliance on places in independent schools.

- The establishment of new specialist provision on other school sites and/or a different number of places in the current or proposed bases.
151. Standards at the schools subject to proposals are good and the schools have a proven track record of high-quality support for learners with additional learning needs. The location of the schools also supports the distribution of places across the city and there is scope to develop the required accommodation within the existing buildings.
152. The proposals put forward are therefore considered to be a preferred option.
153. Decisions regarding which pupils would be proposed to attend the newly established provisions would be made on an individual basis. It is not anticipated that learners will transfer from existing specialist settings unless this is requested by their parents. The majority of learners begin in a mainstream class and transfer at an appropriate point to specialist education. High quality planning and support for transition is well established in Cardiff and is tailored where necessary to the specific needs of parents and learners.
154. The criteria for a Complex Learning Needs and/or Autism Specialist Resource Base placement include:
- All children placed at the base have an Individual Development Plan (IDP)
  - Parents' consent to specialist placement
  - Severe learning delays
  - Learners may also have secondary needs such as speech and language, physical/medical, communication/autism, sensory needs, emotional development
  - Clear evidence that the child's needs cannot be met in a less specialist placement with appropriate support
  - Consultation with the school
155. The Council acknowledges that a change in environment can be unsettling and upsetting for children with additional learning needs. Individual learners with additional learning needs would only be impacted by the proposed changes at the point they are admitted to a specialist setting.
156. Cardiff schools have well-established processes for planning and supporting transition between settings. The Council continues to work with schools to identify appropriate transition arrangements for pupils with additional learning needs. The arrangements are dependent on individual need and are progressed as required. The pupil's current and proposed schools work with the learner and their family, and any other specialists who may be involved, to ensure the child or young person is well-prepared and experiences success. This process will be the same, whether the learner is admitted to an existing specialist setting or a newly opened setting.

157. The Council provides a range of support to specialist support to schools including specialist staff, CPD support for staff development, ALNCO forums, cluster ALNCO meetings, termly additional learning needs updates for Headteachers and regular updates for governing bodies. The proposed changes would be planned carefully so that the school's leadership and governance are not disrupted, which could have a negative impact on educational standards.
158. The accommodation requirements to allow for the establishment of specialist resource base provision have been agreed in principle with the relevant governing bodies. The Council has developed a specification for resource bases that can be adapted for various setting and will work with schools to identify appropriate locations within the existing buildings with appropriate investment to ensure that the facilities are fit for purpose.
159. Further information regarding staffing levels, appointments and professional learning opportunities has been provided as part of the consultation meetings held with individual schools.
160. A summary overview of staffing and resourcing requirements is given below.
161. Primary Complex Learning Needs and/or Autism Specialist Resource Base staffing and resourcing:
- 2 classes of 10 pupils
  - 1 teacher, 2 G4 TAs, 1 Midday Supervisor per class
  - All posts are fully funded and include an ALN allowance
  - ALN resources (currently £500 per pupil)
  - Staff are employed by the governing body, and are subject to school policies
  - Inclusion Service play an advisory role on appointment of teachers
  - LA provide a range of professional learning opportunities
  - Education Psychology allocation
162. The Council works closely and constructively with partners on its Welsh Education Forum, which includes representatives of nursery, primary, secondary and further education, childcare, RhAG and the Welsh Government. The Forum actively informs the planning of Welsh-medium places, to continue to drive the Council's plan to sustainably increase the number of learners within Welsh-medium schools and those learning Welsh in English-medium schools.
163. The Council, and its partners on the Welsh Education Forum, are committed to driving the increase in number of pupils educated through the medium of Welsh, to meet the targets within Cardiff's WESP, and to meet the targets set out in the Welsh Government's Cymraeg 2050 strategy.
164. A 20-place specialist resource base for learners aged 4 – 11 with complex learning needs and autism spectrum conditions was established at Ysgol Gymraeg Pwll Coch in September 2018.

165. A specialist resource base for learners with Autism Spectrum Condition aged 11 – 19 was established at Ysgol Gyfun Gymraeg Glantaf in September 2023. The school also has a specialist resource base for learners with complex learning needs.
166. The Council monitors demand for additional learning needs provision and the patterns of take-up in Welsh medium provision at primary and secondary age, with a view to bringing forward appropriate plans to meet any increased demand.
167. When considering the potential for impact on the wider community as a result of the proposed changes, the following are taken into account: Public Open space, parkland, the current use of the school facilities by the community, noise and traffic congestion.
168. The schools that might be affected by the proposals are existing schools. They offer a range of school activities, and some have community organisations offering services from the school. The views of the schools and the wider community on any potential impacts were sought as part of the consultation and any issues raised have been considered as part of the post consultation analysis process.
169. The inclusion of “some pupils may have associate difficulties including autism, physical or medical needs, speech and language difficulties...” at page 20 of the consultation document is a description of co-morbidity, written for non-specialists who may not be familiar with this concept. It should not be considered as meaning that learners with a widely disparate range of learning levels, not able to be supported within one class, would be placed in a specialist setting.
170. The common criteria for every complex learning needs base or special school is that learners will have severe learning difficulties and require access to a specialist curriculum. Many learners placed in a complex learning needs setting will have additional ‘co-morbid’ needs e.g. autism, physical or medical needs, speech and language difficulties but these needs would not warrant placement in a complex learning class if a severe learning difficulty were not a factor.
171. When considering specialist placement, Cardiff applies a robust set of criteria to ensure appropriate steps are taken to meet the learner’s needs in a mainstream setting, before any consideration for a specialist setting.
172. The decision that specialist placement is appropriate is made by a professional panel and based on a consideration of the evidence. A Person-Centred Planning meeting must be held at the school prior to submitting a specialist provision request, in order to gather the views of the child or young person, parents/carers and all professionals involved in supporting the child.
173. The Council will consider placement in a specialist provision where the evidence shows that:
  - The learner’s difficulties are severe, complex, and long-standing and have not been resolved despite a range of well-planned interventions.

- The school or setting has taken relevant, purposeful action to support the child's learning and wellbeing, including seeking and implementing specialist advice, monitoring, and reviewing the impact of strategies and support over time.
  - The school or setting has demonstrated effective use of available resources to implement the child's ALP.
  - There is substantial evidence that despite purposeful, relevant action to implement appropriate strategies and support, the learner's needs are not being met, nor can they reasonably be met, in a less specialised setting.
  - The young person, or the child's parents/ carers are willing to consider specialist placement.
174. Cardiff maintains Individual Development Plans (IDPs) for all learners who are looked after or who belong to one of the identified groups for which the LA must maintain the IDP. Cardiff recognises that there is also a responsibility to consider maintaining an IDP 'where it is not reasonable for the school to secure the Additional Learning Provision'.
175. IDPs are statutory, whether school or LA maintained, and all learners have access to rights of appeal to the ALN Tribunal, regardless of whether the IDP is school, or LA maintained.
176. The majority of learners placed in a specialist resource base or special school have a school maintained IDP, as it is reasonable to expect that the schools will secure the Additional Learning Provision.
177. Complex learning bases cater for children with severe learning difficulties and provide a specialist curriculum. Autism specific bases cater for children whose learning is low, average to high ability, and the aim is to enable learners to access the mainstream curriculum as far as possible, complemented by more specialist interventions and support as required. The Council facilitates school to school sharing of practice to inform the development of appropriate curricula.
178. The Council has positive joint working relationship with health services and aims to ensure services such as speech and language therapy can work with children in school wherever possible: this applies to mainstream as well as specialist settings.
179. Coed Glas Primary School was most recently rated C for condition (Poor with major defects) and B for suitability (Satisfactory). Ongoing maintenance of school buildings is managed through the Council's asset programme. All school condition and suitability issues identified are prioritised and assessed by qualified surveyors along with consultation with Council Health & Safety (H&S) officers, to ensure urgent priorities are being met, and that other priorities can be mitigated in the short term and then later addressed permanently. Works directly related to, and required for, the successful establishment of the specialist resource base would be prioritised within the asset programme. The overall condition and suitability ratings of the buildings do not impede on the ability of the school to accommodate the proposed specialist resource base.

180. Severn Primary School was most recently rated C for condition (Poor with major defects) and B for suitability (Satisfactory). As outlined above, ongoing maintenance of school buildings is managed through the Council asset programme. Due to the school's age the condition is monitored regularly with interim repairs taking place to ensure it remains weather tight. The roof is planned to be replaced by the Council in the next couple of years and officers are content that any interim issues can be managed and will be attended to. Works directly related to, and required for, the successful establishment of the specialist resource base would be prioritised within the asset programme. The overall condition and suitability ratings of the buildings do not impede on the ability of the school to accommodate the proposed specialist resource base.
181. Estyn's view regarding the inclusion of Additional Learning Needs information from the most recent Estyn inspections is noted.

### **Albany Primary School Governing Body**

182. The Albany Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
- *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.
  - *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.*
  - *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.*

### **Appraisal of views expressed**

183. The Council welcomes the Governing Body's support for the proposal.



184. Demand for places continues to be kept under review and further proposals will be brought forward as required.
185. The Council supports schools to respond to the needs of newly arrived children in Cardiff. Headteachers and school staff are aware of the relevant reactive systems and processes to follow, and Inclusion Officer to contact. Where a school identifies needs that require further assessment and potentially additional support arrangements are put in place. As these systems are appropriate to the issue raised, there is no further change proposed.

### **Coed Glas Primary School Governing Body**

186. The Coed Glas Primary School Governing Body submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
- *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.*
  - *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.*
  - *Governors firmly believe that reducing the PAN to 60 is crucial to the success of a new base at Coed Glas and to the school community as a whole. The impact of very large class sizes on children cannot be underestimated. Several parent governors have had their own children in the situation of being in a very large class before the school was able to split into three classes. Without any spare classrooms, should an SRB be opened at Coed Glas, there is a real risk of class sizes increasing to unmanageable levels. Continuing with a PAN of 75 alongside opening an additional SRB is not feasible.*
  - *Governors 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.*
  - *Governors 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.*

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

### **Appraisal of views expressed**

187. The Council welcomes the Governing Body's support for establishing an Autism Specialist Resource Base, in addition to its Hearing-Impaired Base. This will provide positive transition opportunities given that Llanishen High School also hosts both a Hearing-Impaired Base and an Autism Base.
188. The school's Published Admission Number (PAN) is directly related the accommodation available and the way in which this is being used. In the event of the proposal for the establishment of a second specialist resource base at the school being progressed an updated capacity assessment would be undertaken. This would include consideration of the accommodation requirements of the new

base and the use of the available accommodation. This would inform further discussions with the school regarding an appropriate admission number.

189. The Council's Inclusion Service works closely with schools to ensure that when agreeing placements schools are able to meet the needs of learners and that placements do not impact negatively on other children.
190. During the consultation period the Council has had positive discussions with the school regarding an initial staffing plan, to enable the base to begin admitting pupils from September 2024. The Inclusion Service will continue to work closely with the governing body to support appointments, advise on professional learning needs and to support and advise on planning and implementation of transition arrangements, curriculum, and inclusion.
191. The Council will continue to work with schools in relation to the current pressures on school budgets, additional learning needs and the wider budget. The Council confirms that the full cost of the specialist resource base provision is funded by the local authority and will not put further pressure on the wider school budget.
192. The full cost of specialist resource base provision is funded by the Council and will not put further pressure on the wider school budget.
193. At Coed Glas Primary School, a drop-off and pick-up area for school transport to accommodate an anticipated 7 taxis would be needed at a convenient and safe location close to the building entrance. The required space is available on site with reconfiguration of existing facilities.
194. Selected traffic restrictions would be required on adjacent roads to Coed Glas Primary School to improve the current road safety issues including inappropriate parking. Pedestrian safety measures including new crossing provision would further improve the situation. Staff parking would also be reviewed, and the Council's Active Travel Plan officers would work with the school to incorporate this into a revised Travel Plan for the school.

### **Coed Glas Primary School Headteacher**

195. The Coed Glas Primary School Headteacher submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
  - *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.*
  - *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.*

- *The right recruitment to any new SRB is crucial. It is vital that staff have experience and training that includes de-escalation techniques and Thrive. For a new SRB to be successful at Coed Glas it is essential that any child joining us who requires greater levels of support on a regular basis is found a more suitable place or additional funding is provided to increase levels of staffing.*
- *Staff brought up the difficult juxtaposition of an ALN system for mainstream pupils with IDPs which is woefully underfunded alongside a new SRB that would be fully funded.*
- *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.*
- *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.*
- *Vital to the success of a new SRB would be a cap on our pupil numbers at 60 rather than our current 75. Continuing with a PAN of 75 would mean mixed year groups which is something we are not prepared to do.*
- *Because we have a PAN of 75 we continue to admit pupils mid-year on a very regular basis. Reducing our intake to 60 would reduce pupil mobility which also adds to staff workload.*
- *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.*
- *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.*

- *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.*

### **Appraisal of views expressed**

196. The Council welcomes the Headteacher's support, consistent with that of the school's Governing Body, for establishing an Autism Specialist Resource Base. This will provide positive transition opportunities given that Llanishen High School also hosts both a Hearing-Impaired Base and an Autism Base.
197. Issues related to staffing and funding are addressed at paragraphs 190 – 192.
198. Issues related to the school's Published Admission Number are addressed at paragraph 188.
199. Issues related to the car park are addressed at paragraph 194.

### **Greenway Primary School Governing Body and Headteacher**

200. The Greenway Primary School Governing Body and Headteacher submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)
- *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.*

## **Appraisal of views expressed**

201. The Council welcomes the Governing Body's support for the proposal.

202. The Council's Inclusion Service will continue to work closely with the Governing Body to plan a budget for the base, support appointments, advise on professional learning needs and to support and advise on planning and implementation of transition arrangements, curriculum, and inclusion.

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

203. *The Severn Primary School Governing Body and Headteacher submitted a response which included the following points: (a copy of the response can be seen at Appendix 8)*

- *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.*
- *Plan 2 - As above, but only using two classrooms and the main hall upstairs of the main school building to house the displaced classes.*
- *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 feel less anxious about sending their children to provision in a different part of the city.*
- *The SRB would offer a more inclusive approach for all stakeholders.*

- *The school would receive additional funding to run the SRB.*
- *There would be potential to increase the numbers of pupils who could attend Severn Care Club if the upstairs could be used to house classes. The current Reception classroom could become Severn Care Club. This would allow Nursery parents to use the provision in the morning which is not currently available. This could in turn increase numbers on roll for the school moving forward.*
- *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.*
- *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 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.*
- Would the SRB be subject to our standard school policies? If this is the case, these would all need to be revised. Or will specific policies be written relating to the SRB? Who will be responsible for writing these and will they need to be approved by the School's Governing Body?*
- In addition to this, who will be responsible for writing risk assessments in relation to the SRB?*
- The SRB will impact on daily school timetables and functions. For example, our playground areas are small and timetables would need to be staggered in order to accommodate playtimes, lunchtimes and access to these areas for lessons. This will mean less available time for the curriculum in these areas. Hence why, use of the upstairs of the school is vital (In particular the hall) to the success of the SRB and the school as a whole.*
- Housing the SRB in any other location on the school site would be a short-term solution as evidence suggests pupil numbers will rise in the near future.*
- Overall, we are keen to support the proposal as we highlighted earlier in the letter. However, we do feel that the SRB would not function effectively unless it was located where the Year 3 classrooms currently are and that the school had access to the upstairs space in the main building.*
- 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.*

### **Appraisal of views expressed**

204. The Council welcomes the Governing Body's, Headteacher, Deputy Headteacher and Additional Learning Needs Coordinator's support for the proposal.
205. The accommodation available on the ground floor of the Severn Primary School buildings has sufficient capacity for up to 530 learners and a 96-place nursery.
206. The first floor of the Severn Primary School building had been occupied by the Severn Adult Education Centre for many years but ceased courses during the Covid 19 lockdown, and formally closed following consultation.
207. Cardiff's Community Teaching Team, supporting up to 90 learners that are unable to access a school placement, has utilised the accommodation since September 2023.
208. Whilst the first-floor accommodation is suitable for its existing purpose, significant investment would be required to refurbish part of this for classroom and ancillary space, to ensure safeguarding and partition of accommodation between school use and Community Teaching Team use.
209. The Council will work closely with the Governing Body to identify an appropriate location within the accommodation available on the ground floor, with investment to ensure the base and any necessarily relocated resource rooms are fit for purpose. This will ensure the school retains its current Published Admission Number of 60 places and a nursery capacity of 96 places.
210. Specialist Resource Base staff would be appointed by the school's governing body and would be subject to school policies. It is not usually necessary to re-write policies for this purpose, but HR and the Inclusion Service can support the school when considering the impact of changes.
211. Further information about the staffing and funding for a resource base were shared with governors at the consultation meeting. The Inclusion Service will continue to work closely with the governing body to plan a budget for the base, support appointments, advise on professional learning needs and to support and advise on planning and implementation of transition arrangements, curriculum and inclusion.
212. The full cost of specialist resource base provision is funded by the Council and would not put further pressure on the wider school budget.
213. Severn Primary School was most recently rated C for condition (Poor with major defects) and B for suitability (Satisfactory). As outlined in paragraph 180, ongoing maintenance of school buildings is managed through the Council's asset programme. All school condition and suitability issues identified are prioritised

and assessed by qualified surveyors along with consultation with Council Health & Safety (H&S) officers, to ensure urgent priorities are being met, and that other priorities can be mitigated in the short term and then later addressed permanently.

214. Due to the school's age, the condition is monitored regularly with interim repairs taking place to ensure it remains weather tight. The roof is planned to be replaced by the Council in coming years and officers are satisfied that any interim issues can be managed and will be attended to.
215. Works directly related to, and required for, the successful establishment of the specialist resource base would be prioritised within the asset programme. The overall condition and suitability ratings of the buildings do not impede on the ability of the school to accommodate the proposed specialist resource base.

### **Other responses received**

#### **The need for appropriate provision**

216. *It is important for neurodivergent children to have appropriate education places to support growth and development.*

#### **Appraisal of views expressed**

217. Many neurodivergent children are successfully included in their local school and are able to learn and thrive in this environment. However, the Council recognises the importance of ensuring there are sufficient places to meet the needs of the small number of neurodivergent learners with more complex needs, who may require a more specialist placement in order to learn and thrive.

#### **Demand for places**

218. *There is an increasing demand for specialist places for children with complex learning needs across Cardiff.*
219. *There is a need for places at every school level.*
220. *Provision in schools for autism is woeful and more sites may relieve pressure on individual schools.*
221. *There is also a need for additional provision in mainstream schools.*
222. *There are not sufficient places for children with ALN across the city.*
223. *Children with ALN are struggling; children have to right to be supported.*
224. *Each school should have an SRB.*
225. *There should be more units at mainstream schools; there are lots of children on the spectrum who struggle in mainstream but who do not meet the criteria for specialist schools.*

### **Appraisal of views expressed**

226. There is a need for more locally based specialist provision to ensure children can access the support they need in their local area. The proposals have been brought forward in order to increase the number and distribution of specialist resource base places across the city.
227. The proposed changes would provide 60 additional permanent primary age complex learning needs an/or autism specialist places from September 2024.
228. Demand for places continues to be kept under review and further proposals will be brought forward as required.

### **Local Provision**

229. *There are high levels of ALN pupils with complex needs in the Southern Arc with no provision available; this results in children having to travel to other areas of the city which creates difficulties for families e.g., language barriers, lack of support.*
230. *It is really important that families and children are able to be educated within their community/area. It is perhaps especially important for those families who are less comfortable about engaging with specialist services in an unfamiliar area.*
231. *The BAME community in Cardiff deserve to have SRB places locally not in very white areas of the city that they can't get to.*

### **Appraisal of views expressed**

232. There is a need for more locally based specialist provision to ensure children can access the support they need in their local area. The current proposals have been brought forward in order to increase the number and distribution of specialist resource bases across the city.

### **Funding/Resources**

233. *All schools need additional resources for additional learning needs*
234. *The allowance per pupil should be reviewed in light of what is required to meet needs. Where a school or provision is the only one of its kind in the country, the price per pupil cannot just be assumed based on the needs of ALN pupils in other schools and should be increased accordingly.*

### **Appraisal of views expressed**

235. Funding for specialist settings is kept under review, in order to ensure changes can be made where the range and level of pupil needs changes.

### **How will additional resources be funded and staffed.**

236. *All Schools should have an allocated specialist system for those in need, unfortunately there is so much under funding and the system & support needs improvement on a wider spectrum. Many schools are struggling as there are not enough funds and children are being left to manage or schools have to choose who needs support the most, this shouldn't be the case all children have a right to be educated at each level and understanding needed.*

#### **Appraisal of views expressed**

237. Every school has an indicative Additional Learning Needs support budget to meet the needs of children in the mainstream school. There is a statutory duty on schools to ensure every learner with an additional learning need is identified, and to identify and provide the additional learning provision required in order for them to learn and thrive.

#### **Additional Special School Provision**

238. *There should be an additional special school like The Hollies for children with autism.*

239. *Please consider a complete school for Autism and ALN where the needs of the children can be met at correct ratios and the staff have the correct training and space to provide the students with the support, they actually need rather than in current schools that are making these kids suffer significant trauma and making parents go to tribunal to get the right thing.*

#### **Appraisal of views expressed**

240. Several special schools in Cardiff are staffed, resourced and qualified to meet the needs of learners with autism, including The Hollies, Riverbank, Meadowbank, Ty Gwyn and Woodlands. Places at each of these schools have been increased over the last few years, and the need for places continues to be kept under review.

#### **Behaviour issues**

241. *Children with behavioural issues can be violent and would want to understand how these children would be kept separated from other children.*

242. *A lack of understanding is leading to children being excluded from education.*

#### **Appraisal of views expressed**

243. The safety of all children is a priority in every education setting. Staff are trained to help children avoid becoming dysregulated and presenting with challenging behaviours, and to know how to de-escalate situation and to ensure children are kept safe. Classrooms and other facilities are designed to provide a safe, nurturing environment.

#### **School Accommodation**

244. *Coed Glas is large and noisy and some children with autism may find this overwhelming.*
245. *Place ALN children in separate buildings where they cannot disrupt other children.*
246. *Careful consideration needs to be given to the space allocated for not just teaching, but also for breaktimes and lunchtimes. It is highly likely that pupils with autism with sensory differences will find it difficult to manage crowded, noisy corridors and will benefit from sheltered spaces to regulate their emotions during breaktimes.*

### **Appraisal of views expressed**

247. The Council maintains five successful bases for children with autism and is experienced at designing spaces appropriately and ensuring children are placed appropriately. A mainstream setting will not be right for every child, and careful consideration needs to be given to learning spaces.

### **Inclusion**

248. *The point of inclusion is to enable children to take part altogether in play. Any new provision at Coed Glas Primary School would need to be staffed appropriately and it may be necessary to have a separate play area as too many children on the playground at once can be overwhelming.*
249. *Inclusion is only possible on a case-by-case basis and some children would not cope in mainstream situations. There is not sufficient information available to teachers to make an informed decision on how the proposal (Coed Glas) would work in reality.*

### **Appraisal of views expressed**

250. The council maintains five successful bases for children with autism and is experienced at designing spaces appropriately and ensuring children are placed appropriately. A mainstream setting will not be right for every child, and careful consideration needs to be given to learning spaces.

### **Staffing**

251. *If the SRB staff are off sick, would staff be expected to cover; teachers are already dealing with undiagnosed children in their classes and are at the limit of exhaustion.*
252. *This expansion of provision will need to include specific staff training to ensure that each of the resource bases are able to respond appropriately to the needs of their pupils.*
253. *There is a need to ensure that the teachers and TA employed have experience in special needs and aren't just new to teaching or agency staff.*

254. *All staff need to be educated to help understand and support children with autism and additional learning needs.*
255. *More specific roles needed/ teaching, Teachers learning programs to be updated.*
256. *More spaces are needed with qualified staff that understand the children; there is no point in creating additional places without the right people there to support children.*

### **Appraisal of views expressed**

257. The council maintains five successful bases for children with autism and is experienced at supporting the appointment process and providing a range of professional learning to ensure specialist resource bases are staffed by appropriately trained and experienced staff.

### **Additional/Alternative Provision**

258. *St Paul's Church in Wales Primary School would be suitable to host provision.*
259. *Consideration should be given to establishing provision at Ton yr Ywen Primary School.*
260. *Build a school for children with autism on the east side of the city like Ysgol y Deri.*
261. *Consideration should be given to establishing provision within faith schools.*

### **Appraisal of views expressed**

262. The Council will continue to keep ALN provision under review and to consider all options for developing new settings as required.

### **Secondary School Places**

263. *What is the plan for secondary aged learners; the increase in primary school places will lead to an increased demand at secondary level when there already aren't enough spaces.*
264. *There needs to be appropriate capacity within the secondary sector to accommodate additional pupils.*

### **Appraisal of views expressed**

265. The current proposals include proposals for secondary aged learners, as well as primary. In addition, there are a number of other proposals which were consulted on previously. Due consideration is given to the required balance between primary and secondary provision and proposals for additional places at secondary level will be brought as required.

### **Range of Needs**

266. *Neurodiversity is not just autism and the needs of children with FASD also need to be considered.*

### **Appraisal of views expressed**

267. The needs of all learners with additional learning needs are taken into account when planning specialist provision.

### **Traffic and Parking**

268. *The parking situation at Coed Glas is not working as it currently is. There are only 2 disabled parking bays with plenty of disabled badge holders needing to use them at the same time as well as parents/staff/visitors using the spots who don't have a badge. There would need to be major changes to this to be able to get additional buses/taxis/cars into the school car park without any complications, many ALN children don't have road safety awareness, so it is vital they are able to be taken as close as possible to the entrance and with supervision. It simply would not work without changes to the car park.*

269. *Safety going in & out of school (Coed Glas Primary School) from the back entrance upon Fidlas 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 this road and its accessibility should be addressed at the beginning and end of the school day.*

### **Appraisal of views expressed**

270. Issues related to parking at Coed Glas Primary School and road safety are addressed at paragraph 194.

### **Welsh Language Provision**

271. *There is a need for additional provision within Welsh-medium schools.*

### **Appraisal of views expressed**

272. Cymraeg 2050: A million Welsh speakers' is the Welsh Government's strategy for the increasing the use of the Welsh language. It sets out the long-term approach to reaching a target of a million Welsh speakers by 2050.

273. All Local Authorities in Wales are required to publish a Welsh in Education Strategic Plan. Within their plan, they must set a ten-year target for the expected increase in Year 1 children who are taught in Welsh. The target set for Cardiff by the Welsh Government is between 25% and 29% of Year 1 learners are educated in Welsh by 2031. At present, this figure is around 18%.

274. Cardiff is committed to achieving a scale of growth in line with the 25 – 29% target as provided by the Welsh Government; however, the local target must balance ambition with an understanding of the prevailing trends, which includes falling

birth rates and heightened uncertainty relating to school admission choices due to the pandemic.

275. The number of places currently available through the medium of Welsh would not be sufficient to support an increase in take up that would meet the targets set out by the Welsh Government.
276. Cardiff's Welsh in Education Strategic Plan (WESP) sets out a series of ambitious commitments to build on the progress achieved to date. These will ensure that every child in the city can receive an education in the language of Welsh, the number receiving their education in Welsh-medium schools will increase, and through the significant use of Welsh in English-medium education all will have the opportunity to become confident in speaking Welsh.
277. The approved WESP commits to ensuring city wide capacity in the primary Welsh-medium sector at 10% over and above the projected intake at Reception to support growth and allow for in-year admissions and flexibility for transition.
278. Outcome 6 of the WESP commits to an increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018).
279. A strategic approach to developing specialist ALN provision has been developed to enable the LA to plan for the future of ALN provision within the Local Authority, to understand our current resource availability and to address need in the medium and long term.
280. To achieve this outcome and ensure high quality additional learning provision for all pupils in Welsh-medium education who have or may develop additional learning needs, in the first 5 years the Council will:
  - Further develop the range of professional learning opportunities in relation to ALN to build capacity of the Welsh medium workforce to identify and meet a range of additional learning needs.
  - Continue to support a range of approaches to early intervention and support across all Welsh-medium schools, to ensure equal linguistic opportunity.
  - Provide information and advice for children and young people and their families, ensuring school and Council websites include information about how additional learning needs are identified and addressed in our Welsh-medium schools, including information about specialist provision.
  - Regularly seek the views of learners and their families about the effectiveness and impact of additional learning provision to 'keep additional learning provision under review'.
  - Monitor requests for transfer from Welsh-medium schools into the English-medium sector in the city and undertake further research where those that opt



out of this sector have ALN IDPs in place to ensure an improved understanding of concerns appropriate reassurance and support is provided with a view to reconsideration to remain.

- Review the impact of the Welsh-medium primary Wellbeing Class and the secondary 'virtual Specialist Resource Base' for pupils with emotional health and wellbeing needs along with considering the learning and implications for future development of specialist provision in the sector.
- Review Welsh medium 'Stage 3 and Stage 4' provision as part of a city-wide review, to determine how best to further improve early intervention and prevention of ALN.
- Develop and deliver an increased number of secondary specialist places to be delivered in specialist resource bases 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.
- Develop and deliver an increased number of primary specialist places to be delivered in specialist resource bases in at least three primary schools that promote to the relevant secondary schools.

Over the next 10-years the Council will:

- Deliver further ALN SRBs on primary sites as large residential LDP areas develop.
- Work with partners in Health to improve access to therapy support and advice through the medium of Welsh.
- Work with Welsh Government and other partners to improve access to assessments and resources in the medium of Welsh.

### **Learning opportunities**

281. *What steps will be taken to safeguard the learning opportunities of current pupils?*

### **Appraisal of views expressed**

282. The Council and all Cardiff schools are committed to ensuring that learning opportunities for all learners are a priority consideration.

283. The Council works closely with the governing bodies and Headteachers to make sure that standards in schools are high, that teaching is good and that leadership and governance is strong.

284. Standards at the school included in the proposals are good and it is not expected that the establishment of specialist resource base provision will impact negatively on the schools.

285. The Council would continue to work with the leadership of the schools to make sure everyone understands their responsibility for helping to improve and sustain high performance. It would support the schools to have a good relationship with parents and other partners so that pupils receive a high-quality education.
286. The proposed changes would be planned carefully so that the schools' leadership and governance are not disrupted, which could have a negative impact on educational standards.