



RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

CABINET

17TH DECEMBER 2019

REVIEW OF LEARNING SUPPORT CLASS PROVISION FOR PUPILS WITH SOCIAL, EMOTIONAL AND BEHAVIOURAL DIFFICULTIES (SEBD) AND SIGNIFICANT ADDITIONAL LEARNING NEEDS

REPORT OF THE DIRECTOR OF EDUCATION AND INCLUSION SERVICES IN DISCUSSION WITH THE CABINET MEMBER FOR EDUCATION AND INCLUSION SERVICES, COUNCILLOR J ROSSER

Author: Ceri Jones – Head of Inclusion Services

1. PURPOSE OF THE REPORT

- 1.1 The purpose of this report is to provide Members with an opportunity to consider proposals for the creation of additional mainstream Learning Support Class (LSC) provision for pupils with Social, Emotional and Behavioural Difficulties (SEBD) and Welsh medium LSC provision to support pupils with significant additional learning needs within Rhondda Cynon Taf (RCT)

2. RECOMMENDATIONS

It is recommended that Members:

- 2.1 Consider the information contained within this report.
- 2.2 Note the proposals for the creation of three SEBD LSC provisions and one Welsh medium LSC provision to support pupils with significant additional learning needs within the context of the School Organisation Code (2018) and the 21st Century School Modernisation Programme.
- 2.3 Formally approve to commence consultation on the following proposals:
- 2.3.1 To create a new Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School;
- 2.3.2 To create a new Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School;
- 2.3.3 To create a new Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School;
- 2.3.4 To create a new Key Stage 3/4 LSC provision for pupils with significant Additional Learning Needs (ALN) at Ysgol Garth Olwg.

3. REASONS FOR RECOMMENDATIONS

- 3.1 To progress the proposal in accordance with the process outlined in the School Organisation Code (011/2018) so that an improved continuum of Special Educational Needs (SEN) provision can be achieved in RCT.

4. BACKGROUND

- 4.1 Considerable changes are planned in Wales in relation to the statutory provision required to meet the needs of pupils with SEN/additional learning needs (ALN). The Additional Learning Needs and Education Tribunal (Wales) (ALNET) Act was introduced in January 2018. The Act requires local authorities to keep under review the arrangements for supporting pupils with ALN within their area and consider whether these are sufficient. This includes a statutory requirement to take all reasonable steps to create a bilingual system of support for pupils with ALN. The Act will be supported by new regulations, including secondary legislation and a new statutory Additional Learning Needs Code. The current draft Code is based on the following principles:

- meeting the needs of pupils with ALN should be part of a whole school approach to school improvement;
- pupils must be supported to participate in mainstream education and in the National Curriculum as fully as possible wherever this is feasible.

- 4.2 Until the anticipated implementation of the new ALN Code in September 2021, Local Authorities (LAs) are required to comply with the existing Special Educational Needs (SEN) Code of Practice for Wales (2002) and fulfil their statutory duties towards children with SEN. The Code states that children and young people have SEN if they have a learning difficulty which calls for a special educational provision to be made for them. Early years settings and schools are required to adopt a graduated response to meeting SEN at Early Years/School Action and Early Year/School Action Plus of the Code of Practice. For learners with the most significant SEN, a Statement of SEN is issued by the Council and statutory provision put in place.

- 4.3 A total of £3.4m Additional Needs Funding (ANF) is available to mainstream schools to ensure statutory mainstream provision for learners is robust and to support mainstream inclusion for learners with severe and persistent needs.

- 4.4 For pupils with more significant needs who experience difficulties in coping with mainstream education, more specialist placements are required. Rhondda Cynon Taf has a range of specialist provisions which includes: 44 LSCs, 2 Pupil Referral Units (PRUs) and 4 Special Schools. These placements are agreed by Access and Inclusion Service panels.

- 4.5 RCT has an excellent range of LSC provisions attached to mainstream schools. However, in light of the requirements of the ALNET Act, concerns regarding rising exclusions and an increase in requests for SEBD placements it is felt

necessary to enhance the current LSC provision to address the above issues. Additionally, schools are reporting increasing levels of learners with mental health and social, emotional and behavioural difficulties in mainstream contexts.

- 4.6 Data analysis confirms that:
- there is currently insufficient SEBD provision in the secondary sector;
 - there is currently no discreet specialist provision for Welsh medium pupils with significant additional learning needs.
- 4.7 In light of these findings, the proposal for change seeks to achieve the following aims:
- to enhance the continuum of provision that effectively addresses the need for specialist SEBD provision within Key Stage 3/4;
 - to create a specialist LSC provision for Welsh medium Key Stage 3/4 pupils with significant ALN.

5. **CURRENT POSITION**

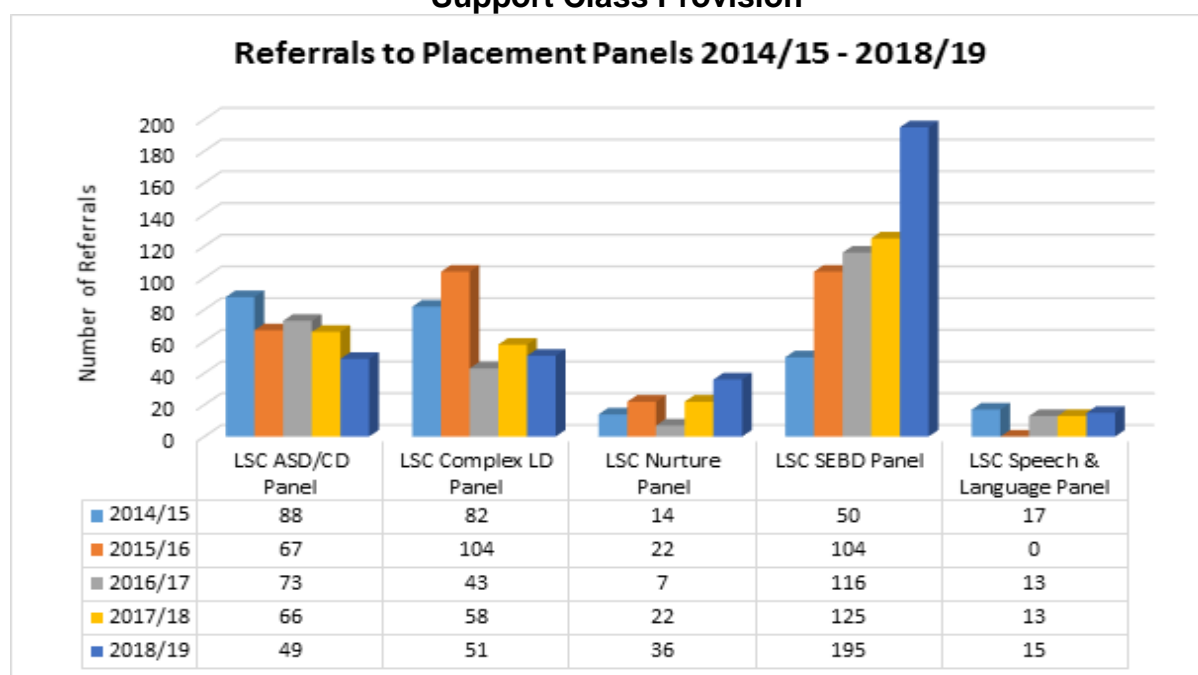
- 5.1 RCT spends in the region of £4.1 million annually on the provision of LSCs. There are currently approximately 362 pupils accessing the 44 LSC provisions within RCT across a range of needs. Table 1 outlines the range of mainstream LSCs currently available:

Table 1: Current Mainstream Learning Support Classes

SEN Learning Support Classes	Foundation Phase (FP) or Key Stage (KS)	Number of classes	Percentage of Overall LSCs
Autistic Spectrum Disorder (ASD)	FP	5	39%
	KS2	6	
	KS 3 / 4	6	
Complex Learning Difficulties	FP	3	27%
	KS 2	6	
	KS 3 / 4	3	
Hearing Impairment	FP/KS 2	1	2%
Observation & Assessment	FP	1	7%
Early Years Assessment and Intervention	FP	2	
Nurture	FP	2	
Social, Emotional & Behavioural Difficulties	KS 2	4	18%
	KS 3 / 4	2	
Speech and Language Difficulties	FP/KS 2	2	7%
	KS 3 / 4	1	
Total		44	100%

5.2 As can be seen in Table 2 requests for placements within SEBD provision have far exceeded requests for any other specialist LSC provision with an increase of 290% over the last 5 years. Only 37 of the 126 pupils (29.3%) referred to the SEBD specialist placement panel in 2018/19 were awarded a specialist provision.

Table 2: Number of pupils Referred to Placement Panels for Learning Support Class Provision



5.3 Rates of exclusion within RCT have continued to rise over a five year period and both permanent and fixed term exclusions are currently at their highest with 23 permanent exclusions and 2690 fixed term exclusions in 2018/19. Exclusions also impact upon attendance which, in-turn, impacts upon outcomes for this cohort of pupils.

Table 3: Summary of exclusions within the last 5 years (All settings)

Exclusion Data	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Permanent exclusions	20	4	20	8	23	75
Fixed term exclusions	1683	1532	1948	2229	2690	10082
Number of days lost	4058.5	3284.5	4106	4294	5374.5	21117.5
Average length of exclusion (days)	2.41	2.14	2.11	1.90	2.00	2.11

5.4 In addition, to mainstream settings experiencing a growth in challenging behaviours, the complexity of need within PRU settings has also grown particularly at secondary level. Table 4 reports the significant increase of 632% in the number of fixed term exclusion and a 310% increase in the number of school days lost due to these exclusions with Ty Gwyn Education Centre (the Council's secondary PRU) over a 5 year period.

Table 4: Summary of exclusions within Pupil Referral Units within last 5 years

PRU / Special School Name	Incidents of Exclusion						Days lost due to Exclusion					
	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	Total	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	Total
Tai Education Centre	7	10	3	14	7	41	16.5	16.5	6	30	24	93
Ty Gwyn Education Centre	31	66	106	120	227	550	97	202	187.5	211	441.5	1139
Total	38	76	109	134	234	591	113.5	218.5	193.5	241	465.5	1232

5.5 Data would suggest that there are significant changes in the complexity and behaviours of pupils within the secondary PRU setting. There are currently 52 learners in the setting with severe social, emotional and behaviour needs. Ty Gwyn Education Centre is categorised by Central South Consortium as a ‘red’ setting requiring the highest level of school improvement support. The PRU has experienced considerable changes in staffing during 2018/19 which has posed many additional challenges. Tai, the primary PRU, has relatively low rates of exclusion and was judged by Estyn to be excellent in its inspection in June 2019. It is currently categorised as a ‘green’ setting.

5.6 Analysis of behaviour management data submitted by schools has shown that the number of pupils requiring physical intervention has significantly increased in the last 5 years with a rise of 302% in reported incidents.

5.7 It is important to note, however, that the significant increase could be attributed in part to the raised awareness of the safe use of positive physical intervention following the roll out of Team Teach training to schools.

Table 5: Summary of Physical Intervention Data collated within the last 5 years

Behaviour Data	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Reported use of physical intervention	139	263	273	390	560	681

5.8 Currently Welsh medium pupils with significant additional learning needs who would meet the criteria for LSC provision within English medium settings are supported by a specialist peripatetic team. The team, which includes a Welsh medium specialist teacher and two Learning Support Assistants, provides support through an inclusive delivery model whereby pupils are provided with specialist support within their mainstream settings.

5.9 During the Academic Year 2018/19 the Welsh Complex Needs Team supported 15 pupils with an age range of Year 1 to Year 9 of which:

- 3 attended Foundation Phase

- 5 attended Key Stage 2
- 7 attended Key Stage 3.

5.10 Data analysis suggests that pupils accessing support from the central Welsh Complex Needs Team are making progress that is comparable to that of their peers in English medium LSCs. An evaluation of the above provision in Autumn Term 2019 showed that the above inclusive model adopted in Welsh medium settings has been very positive.

5.11 However, it is concerning to note that due to a lack of Welsh medium LSC provision, 1 pupil had to move from Welsh medium education in 2018/19 and 2 pupils in September 2019/20 in order to access specialist English medium LSC provision. Anecdotally, feedback from schools suggests that some parents of children with ALN sometimes opt to send their children to an English medium school prior to secondary transfer due to the lack of discrete specialist provision in the Welsh medium sector. It is perceived that the level of ALN in the Welsh medium sector may therefore be under represented for this reason.

6. PROPOSALS FOR CHANGE

6.1 Following the data analysis above, the proposals for change are as follows:

- 44 SEN mainstream LSCs remain unaltered
- 4 SEN mainstream LSCs are opened.

6.2 It is proposed that the **new provisions** established from September 2020 are as follows:

- Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynog Comprehensive School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School;
- Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg.

7. CASE FOR CHANGE

7.1 There is a clear need to reduce the number of school exclusions, improve the education prospects of young people susceptible to school exclusions and to address the long-term costs and negative impact of exclusion on learner outcomes and their life chances.

7.2 Research conducted by Barnardo's ¹, suggests that children with SEN are nearly 10 times more likely to be permanently excluded and seven times more likely than others to receive a fixed term exclusion. There is also a strong association between poverty and deprivation, with pupils eligible for free school meals being four times more likely to be permanently excluded from secondary school and three times more likely to receive a fixed term exclusion than their

better off peers. For a few, exclusions may provide the short, sharp consequence that is needed, but for young people whose families are facing challenges it can be detrimental. Recent research published by Samaritans Cymru ² highlights that exclusions can result in loneliness, and social isolation thus impacting significantly on physical and mental health of young people. Repeat exclusions from schools for pupils who are already alienated can further exacerbate difficulties and rates of poor attendance and disengagement.

- 7.3 If we do not effectively meet the social, emotional and behavioural needs of pupils the cost to the young person includes reduced confidence, increased disaffection with school, with poor qualifications and employment prospects in the long term. Permanently excluded children are 3 times more likely than their peers to leave school without qualifications and 37% times more likely to be unemployed Brookes et al (2007)³.
- 7.4 Whilst the option to exclude has its place, the significant growth of exclusions in RCT points to a need for schools and the Council's specialist services to intervene much sooner and more effectively. Schools currently have a responsibility strengthening their approaches but pressures on specialist placements suggest that current provision does not meet need. Effective alternatives to exclusion are needed to intervene before the risk of exclusion escalates to a crisis level and the need for a PRU placement. The expansion of LSC provision would assist in strengthening the continuum of support available for some of our most vulnerable learners and replace demand for more specialist provision. It is estimated that the costs of a place in a PRU is £20,325 per year, compared with the cost of supporting a young person to remain with a LSC attached to a mainstream setting at £9k per annum. A placement in a LSC offers a more inclusive and appropriate solution within a school environment as well as being a more cost effective solution.
- 7.5 Department for Education⁴ reports consistent features that are perceived to work well in supporting pupils social, emotional and behavioural needs are: small class sizes, a relatively high teacher to pupil ratio compared with mainstream schools and intensive one to one pastoral support to understand and tackle the underlying issues that pupils may have, for example through learning mentors or other key workers. A LSC would meet all of these requirements.
- 7.6 In summary, the proposal for change provides a more inclusive model for addressing the escalating exclusion rates and incidents of challenging behaviour in RCT. Evidence clearly suggests that investing in early intervention and preventative approaches can reduce demand for the more specialist costly PRU placements and gives some of our vulnerable pupils the best chance of achieving success. It would also reduce pressures on mainstream schools who are experiencing significant challenges in resourcing the support that is needed for pupils with the most complex needs.

8. EQUALITY AND DIVERSITY IMPLICATIONS

- 8.1 Community Impact, Equality Impact and Welsh Language Assessments have been prepared in respect of this proposal and are attached as Appendix 1, 2 & 3 of this report. The assessments will be published on the Council's website together with the consultation document that outlines the proposal in detail.

9. CONSULTATION

- 9.1 The consultation process in respect of this proposal will be undertaken under the arrangements outlined in the Welsh Government's School Organisation Code (011/2018). These arrangements stipulate that consultation must be undertaken when the proposal is at a formative stage and that a consultation document must be prepared and circulated to prescribed consultees, as well as being published on the Council's website.
- 9.2 The consultation document for the proposals outlined in this report is attached as Appendix 4 and 4a to this report. The consultation period, if it is agreed to progress this matter, will run from the 10th January 2020 until 28th February 2020.

The Consultation report attached is in draft subject to Cabinet approval.

10. FINANCIAL IMPLICATIONS

- 10.1 Secondary schools hosting LSCs provisions are funded via the Council for one specialist teacher and two Learning Support Assistants at an approximate cost of £104k per class. In a bid to address the key priorities of the Council to reduce exclusions, address challenging behaviour within mainstream schools and increase the numbers of Welsh learners by improving the continuum of Welsh medium SEN provision, funding will be redirected from central Education services together with a contribution from Individual Schools Budget (ISB) totalling £416k per annum. Once settings are established it is our expectation that demand for secondary PRU placements will diminish and this funding will offset the increase in costs of the additional LSCs.
- 10.2 The creation of 4 LSCs will incur a transportation cost in line with the Council's Learner Travel Policy, however it may reduce the number of pupils travelling to the sole secondary PRU, and the impact may be marginal. This increase in cost is seen as a necessity in order to enhance provision for RCT's most vulnerable pupils. Costs cannot be quantified at this time as placements are pupil led. However, placement panel will always seek to place a pupil in the nearest LSC that meets their ALN needs.

11. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

- 11.1 Section 316A of the Education Act 1996 specifies that children with SEN should normally be educated in mainstream schools if this is compatible with them receiving the special educational provision that their learning difficulty requires; the efficient education of other children, and the efficient use of resources.

11.2 Section 315 of the Education Act 1996 also requires the Council to ensure that SEN provision is kept under review. Sections 1:20 and 1:21 of the SEN Code of Practice for Wales (2002) also requires LAs to evaluate the effectiveness of school funding arrangements in supporting and raising the achievement of children with SEN.

12. LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELLBEING OF FUTURE GENERATIONS ACT

12.1 The proposals will ensure that two of the Council's three key priorities will be met. These include

- Economy: Building a strong economy
- People: Promoting independence and positive lives for everyone.

12.2 The proposals will ensure that some of the Council's most vulnerable pupils will have the best chance of achieving positive outcomes. The proposals will ensure more efficient and effective use of Council resources to promote the development of social inclusion and positive outcomes for learners.

12.3 These proposals will ensure there is renewed capacity to focus on prevention which is a key statutory requirement of the Wellbeing and Future Generations Act and a key element of the Council's Corporate Plan.

13. CONCLUSION

13.1 Section 315 of the Education Act 1996 requires LAs to regularly review arrangements for supporting pupils with SEN and to ensure that provision is sufficient and meets the needs of its communities.

13.2 The priority for the Education and Inclusion Services Directorate is to continue to focus on driving up standards in schools and to improve the outcomes for all children and young people. In light of the Welsh Government ALN Transformation Agenda and the Council's vision to increase the number of Welsh medium learners in its schools by responding proactively to both national and local strategies such as the Welsh Government Welsh Language Strategy: Cymraeg 2050, Rhondda Cynon Taf's Welsh in Education Strategic Plan and the current 21st Century Schools plan for the restructure of Welsh medium provision in the Taf area, it is essential to enhance current Welsh medium SEN provision within RCT.

13.3 The proposed additional LSCs will ensure that the Council has an enhanced focus on providing more effective mainstream inclusion opportunities for pupils with SEBD and for Welsh medium pupils with significant Additional Learning Needs. The importance of mainstream inclusion for pupils with SEN is reflected in the revised Estyn Common Inspection Framework which highlights that judgements of achievement for all learners including those with additional learning needs should take account of progress made in relation to agreed learning goals from individual starting points. The framework also recognises the positive impact that the expertise within a LSC can have on enhancing

practice and improving outcomes for learners with SEN across the whole school.

- 13.4 The proposals ensure efficient use of resources and a more equitable continuum of provision for pupils with significant SEN.
- 13.5 It is recommended, therefore, that approval is given to commence consultation on the proposed enhancement to RCT's current mainstream LSC provision so that we can urgently address and resolve some of the challenges currently faced within the Council.

**Welsh Language Impact Assessment
Proposal to Enhance Learning Support Class Provision
within Rhondda Cynon Taf**

Introduction

This assessment has been undertaken in accordance with the guidelines outlines in Annex C of the School Organisation Code (011/2018).

Rhondda Cynon Taf (RCT) is proposing to enhance the Special Education Needs (SEN) provision within the County Borough by creating four new Learning Support Classes (LSCs). It is proposed that three classes are created to support pupils with Social, Emotional and Behavioural Difficulties (SEBD) and one Welsh medium LSC to support pupils with significant additional learning needs (ALN).

LSC for pupils with Significant Additional Learning Needs

Currently SEN Welsh medium pupils with significant additional learning needs who would meet the criteria for English medium LSC provision are supported by a specialist peripatetic team, through an inclusive delivery support model. In line with the requirements of Additional Learning Needs Education Tribunal Act (ALNET) 2018, which stipulates that all LAs must provide bilingual provision and the Councils vision to increase the number of Welsh medium learners, our proposal seeks to create a dedicated Welsh medium LSC to support those learners identified as meeting LSC criteria. The host school will be Ysgol Garth Olwg, a Welsh medium through school (aged 3-19) which has benefited from 21st Century modernisation investment. The LSC will support 14 pupils with significant ALN. Places within the class will be allocated via the established SEN Placement Panels.

The Community Lifelong Learning Centre will be unaffected by this proposal. Additionally any services currently provided by Ysgol Garth Olwg to parents, pupils and the community will also remain unaltered, for example; Urdd, breakfast and after school clubs. Information on current building condition and suitability is contained with the consultation document.

One of the main targets outlined in the Council's Welsh in Education Strategic Plan (WESP) is to increase the number of children receiving education through the medium of Welsh, which will assist the local authority in working towards the Cymraeg 2050 Welsh Government target of having 1 million people in Wales able to speak Welsh by 2050. We consider that this proposal will address the existing lack of Welsh medium LSC provision, allowing Welsh medium pupils with significant ALN to remain in a Welsh medium education setting.

LSC for pupils with Social, Emotional and Behavioural Difficulties

The proposal also seeks to enhance LSC provision to support Key Stage 3/4 pupils with SEBD across the LA by creating LSCs hosted by English medium settings at Bryncelynog Comprehensive, Ferndale Community and Mountain Ash

Comprehensive Schools. The LSCs will each support 12 pupils with SEBD. Places within the classes will be allocated via the established SEN Placement Panels.

Any services currently provided by the schools (Bryncelynnog Comprehensive, Ferndale Community and Mountain Ash Comprehensive School) to parents, pupils and the community will remain unaltered; for example breakfast and after school clubs, community rooms. Information on current building condition and suitability is contained with the consultation document.

Conclusion

Section 315 of the Education Act 1996 requires LAs to regularly review arrangements for supporting pupils with SEN and to ensure that provision is sufficient and meets the needs of its communities.

The priority for the Education Directorate is to continue to focus on driving up standards in schools and to improve the outcomes for all children and young people. The proposal is in line with the Welsh Government ALN Transformation Agenda and the Council's vision to increase the number of Welsh medium learners in its schools through its proactive response to both national and local strategies.



Rhondda Cynon Taf Council

Equality Impact Assessment Questionnaire

Learning Support Class Proposals

Equality Impact Assessment Questionnaire

Directorate: Education & Inclusion Services

Service Area: Access & Inclusion Service

Responsible Officer: Ceri Jones

Date: November 2019

This Equality Impact Assessment is written in association with the Community Impact Assessments, the Welsh Language Impact Assessment and the associated Consultation Document.

1. Name of policy/procedure/practice/project: Enhancement of Learning Support Class (LSC) provision within Rhondda Cynon Taf (RCT).

The project is to:

Enhance the LSC provision within RCT in order to better support Special Educational Needs (SEN) pupils to ensure provision meets current and projected pupil need. To achieve this, the proposal is to create 4 new Learning Support Classes; 3 to support pupils with Social, Emotional Behaviour Difficulties (SEBD) and one to support Welsh medium pupils with significant Additional Learning Needs (ALN).

To achieve this the proposal is to:

- create a new Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School;
- create a new Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School;
- create a new Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School;

- create a new Key Stage 3/4 LSC provision for pupils with significant Additional Learning Needs (ALN) at Ysgol Garth Olwg.

2 Policy Aims, you need to consider why is the policy needed? What does the Council hope to achieve by it? How will the Council ensure it works as intended?

This proposal is fully outlined in a detailed consultation document that has been distributed to all interested parties and stakeholders. It is also available on the Council's website for any person to view or download.

In recent years, Estyn has sharpened its approach to inspection of schools and local authorities and has raised the bar in respect of what it considers to be good and excellent provision. Furthermore, Estyn has taken a very hard line on local authorities in Wales that have weaknesses in key areas such as corporate governance, educational standards, attendance levels, surplus places and safeguarding.

Consideration for this proposal has been aligned with the 21st Century Schools and Colleges Programme's long term strategic investment in the education estate throughout Wales. One of the priorities includes: addressing growth in demand for Welsh medium provision.

Rhondda Cynon Taf has an excellent range of LSC provisions attached to mainstream schools. However, in light of the requirements of the Additional Learning Needs and Education Tribunal (Wales) (ALNET) Act 2018 to create a bilingual system to support learners with ALN, and the concerns regarding rising exclusions and an increase in requests for SEBD placements it is felt necessary to enhance the current LSC provision to address the above issues.

The data we have used to realign provision includes:

- Current capacity within each LSC
- Requested placements over the last 3 academic years
- Transitional data
- Primary needs of pupils
- Outcome of requests for placements

Educational Considerations

Considerable changes are planned in Wales in relation to the statutory provision required to meet the needs of pupils with SEN/additional learning needs (ALN). The Additional Learning Needs and Education Tribunal (Wales) Act (ALNET) was introduced in January 2018. The Act requires Local Authorities (LA) to keep under review the arrangements for supporting pupils with ALN within their area and consider whether these are sufficient. The Act will be supported by new regulations, including secondary legislation and a new statutory Additional Learning Needs Code. The current draft Code is based on the following principles:

- meeting the needs of pupils with ALN should be part of a whole school approach to school improvement
- pupils must be supported to participate in mainstream education and in the National Curriculum as fully as possible wherever this is feasible.

Until the anticipated implementation of the new ALN Code in September 2021, LAs are required to comply with the existing Special Educational Needs (SEN) Code of Practice for Wales (2002) and fulfil their statutory duties towards children with SEN. The Code states that children and young people have SEN if they have a learning difficulty which calls for a special educational provision to be made for them. Early years settings and schools are required to adopt a graduated response to meeting SEN at Early Years/School Action and Early Year/School Action Plus of the Code of Practice. For learners with the most significant SEN, a Statement of SEN is issued by the LA and statutory provision put in place.

A total of £3.4m Additional Needs Funding (ANF) is available to mainstream schools to ensure statutory mainstream provision for learners is robust and to support mainstream inclusion for learners with severe and persistent needs.

For pupils with more significant needs who experience difficulties in coping with mainstream education, more specialist placements are required. Rhondda Cynon Taf has a range of specialist provisions which includes, 44 LSCs, 2 Pupil Referral Units (PRUs) and 4 Special Schools. These placements are agreed by Access and Inclusion Service panels.

In light of the requirements of the ALNET ACT and the concerns regarding the continued increase in the number of exclusions of pupils from mainstream settings and the increasing demand for specialist SEBD placements, an in-depth data analysis exercise was undertaken to inform proposals for change.

Data analysis confirms that:

- there is currently insufficient SEBD provision in the secondary sector;
- there is insufficient provision to meet the needs of learners of Welsh medium pupils with significant SEN/ALN.

In light of these findings, the proposals for change seek to achieve the following aims:

- to enhance the continuum of provision that effectively addresses the need for specialist SEBD provision within Key Stage 3/4;
- to create a specialist LSC provision for Welsh medium Key Stage 3/4 pupils with significant ALN;

Proposed changes

- 44 SEN mainstream LSCs remain unaltered
- SEN mainstream LSCs are opened

What are the financial implications of the proposal?

The proposal will ensure that the County Borough Council continues in its commitment to effectively meet the needs of learners with SEN by prioritising resources to address gaps in existing provision and to improve the continuum of Welsh Medium specialist provision within Rhondda Cynon Taf.

The schools will be delegated sufficient funding to establish the proposed provisions. These costs will cover staffing and capitation.

What is the likely impact of the proposal on school pupils?

It is anticipated that the proposals will have a significantly positive impact on pupils with SEBD requiring specialist placement and Welsh medium pupils with significant ALN by providing an inclusive model of specialist provision hosted by mainstream schools that can meet their identified needs within their local community.

Transportation would be provided in line with the Council's Learner Travel Policy to the nearest and most appropriate specialist setting.

The Welsh Government and the Council has adopted the UN Convention on the Rights of the Child which is expressed in seven core aims that all children and young people:

1. Have a flying start in life;
2. Have a comprehensive range of education and learning opportunities;
3. Enjoy the best possible health and are free from abuse, victimisation and exploitation;
4. Have access to play, leisure, sporting and cultural activities;
5. Are listened to, treated with respect, and have their race and cultural identity recognised;
6. Have a safe home and a community which supports physical and emotional wellbeing;
7. Are not disadvantaged by poverty.

We consider that this proposal benefits children in their communities in accordance with the seven core aims set out above.

In addition, we consider that this proposal, contributes positively to Rhondda Cynon Taf's well-being agenda as well as each of the 7 goals of the Well-being of Future Generation Act Wales 2015:

1. A prosperous Wales
2. A resilient Wales
3. A healthier Wales
4. A more equal Wales
5. A Wales of cohesive communities
6. A Wales of vibrant culture and thriving Welsh language
7. A globally responsible Wales

An assessment of the proposals on The Well-being of Future Generations Act's five ways of working is below:

<p>Long Term (The importance of balancing short term needs with the need to safeguard the ability to also meet long term needs)</p>	<p>How does your project / activity balance short-term need with the long-term and planning for the future?</p> <p>The long term vision for RCT is to provide all learners with the best opportunity possible to achieve their full potential through the means of education by providing access to the very best learning opportunities with modern, flexible facilities appropriate for delivering the new curriculum.</p> <p>The enhancement of specialist LSC provision in RCT will ensure the needs of our most vulnerable ALN pupils are addressed.</p>
<p>Prevention (How acting to prevent problems occurring or getting worse may help public bodies meet their objectives)</p>	<p>How does your project / activity put resources into preventing problems occurring or getting worse?</p> <p>The Council recognises the challenges of providing everyone with the facilities and opportunities to receive an excellent education in 21st Century facilities. This proposal aims to enhance and improve the specialist LSC provision available for Key Stage 3/4 pupils, and create enhanced opportunities for the development of more specialist roles and strengthen graduated responses for learners with additional learning needs.</p>
<p>Integration (Considering how the public body's well-being objectives may impact upon each of the wellbeing goals, on their objectives, or on the objectives of other public bodies)</p>	<p>How does your project / activity deliver economic, social, environmental and cultural outcomes together?</p> <p>The Council recognises the importance of the Welsh language as a vital element to achieve and reinforce social and cultural benefits. This proposal will deliver a dedicated Welsh medium LSC for pupils with significant ALN, increase parental choice of provision and provide opportunities for wider community collaboration and participation and improved learning experience.</p>
<p>Collaboration (Acting in collaboration with any other person (or different parts of the body itself) that could help the body meet its well-being objectives)</p>	<p>How does your project / activity involve working together with partners (internal and external) to deliver well-being objectives?</p> <p>RCT is required to keep under review the arrangements for supporting pupils with ALN within its area and consider whether these are sufficient. Feedback from a recent Headteacher Task and Finish Group identified that the lack of Welsh medium LSC provision was an area of</p>

	concern. Stakeholders will have the opportunity to put forward their views during the consultation period.
Involvement (The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves)	<p>How does your project / facility involve stakeholders with an interest in achieving the well-being goals? How do those stakeholders reflect the diversity of the area?</p> <p>Consultation meetings are planned with student councils of all of the schools directly affected by the proposals, as well as with staff and governors, and an open evening will be in a central location which will be open to the public. All comments that are submitted during the consultation process will be considered by Cabinet.</p>

Implications for staff of the LSC

There will be no negative impact on existing LSC staff as current LSCs will be unaffected by the proposals. The proposal will have a positive impact, creating four teaching and eight non-teaching LSC posts, providing development opportunities for existing staff.

Implications on the local communities?

This proposal will not have any significant impact on the local communities for the following reasons:

- More local children will be able to access specialist provision within their local community and the new provisions will address a gap in existing provision. There will be less demand for transporting children out of area to receive their education and this should impact positively on the environment. The schools will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers. The proposed establishment of LSCs will enhance the overall capacity of the host schools to meet a diverse range of needs as there will be further specialist SEN expertise within the schools.

What will be the impact on the other 'partner' schools in the community?

Other partner/associated primary and secondary schools in each community will also benefit from the proposal. The enhancement of LSC provision within RCT will bolster the existing LSC provision and provide 50 additional specialist placements.

3. Who does it apply to? Please indicate by highlighting or deleting as appropriate

Members of the public Staff **Both** **Other**

Please state: SEN children aged 11-16 living in RCT, parents and carers of the children, staff

4. Indicate whether this is a new proposal, a review or a proposed cessation:

New Review Cessation

The proposal covers all 3 districts within the County Borough Council. There are 4 schools affected.

5. Identifying Impacts

Please choose whether the policy/practice will have a positive, negative or neutral effect on **each** issue below: Think about the key questions included in the manager's guidelines.

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why:
	Positive	Negative	Neutral (No impact)	
Age (young and old)	Key Stage 2 Key Stage 3/4		Foundation Phase	<ul style="list-style-type: none"> • Transition into appropriate Welsh Medium specialist provision at KS3/4. • Creation of Welsh Medium LSC provision • Appropriate placements which are well matched to pupils' primary needs • Improved educational outcomes and pupil engagement due to meeting identified pupil needs more effectively. • Greater opportunities for mainstream inclusion in local community schools • Improved continuum of learning provision which improves life chances for our most vulnerable learners
Disability (remember to consider the different types of disability)	Yes			The review of LSC provision will allow the LA to better meet the needs of its SEN pupils. Mainstream schools hosting the LSCs will be fully compliant with all disability legislation.
Gender			Yes	
Gender Reassignment			Yes	
Race			Yes	
Religion or Belief			Yes	
Sexual Orientation			Yes	

People / issues to consider	Impact policy / practice will have			If a positive or negative impact is identified, explain why:
	Positive	Negative	Neutral (No impact)	
Welsh Language	Yes			The creation of a LSC provision to support pupils with significant ALN through the medium of Welsh, thus supporting the Council's vision to increase the number of Welsh medium learners in its schools through the 21 st Century Schools modernisation plan, the Welsh Language Strategy, Cymraeg 2050 and to comply with the criteria of the ALNET Act to develop a bilingual ALN system.
Parents/Carers	Yes			<ul style="list-style-type: none"> • Increased potential to access appropriate specialist provision. • Increase opportunity for parents/carers to choose appropriate Welsh medium specialist provision.

Evidence

6. What evidence is there to support your conclusions? Please indicate below

Reports of the Director of Education to Cabinet – December 2019.
Public Consultation Document on the Proposal – January 2020.

7. In areas where a negative impact has been identified are there any ways that the negative effect could be reduced or removed? Please indicate below and include the evidence on which you have based your conclusion.

No negative impacts have been identified. Implementing this plan will be of benefit to pupils with SEBD and Welsh medium pupils with significant ALN across RCT and will ensure greater equality and access to specialist provision.

The creation of new LSCs could initially cause some limited disruption to the host mainstream schools for a period of time. However, it is recognised that hosting a specialist LSC provision enhances whole school-based SEN systems, thus improving outcomes for pupils with SEN across the whole school.

The Council considers that the educational advantages of the proposals outweigh the short-term impact of the changes for the pupils and parents.

Involvement & Consultation

9. What involvement and consultation has been done in relation to this (or similar) policy and what are the results?

The following consultation meetings are to be held:

School Affected	Group-Pupils/ Staff/Parents	Time	Date	Venue
Ysgol Garth Olwg	Governing Body and staff	3:30pm - 4:30pm	13th January 2020	Ysgol Garth Olwg
Bryncelynnog Comprehensive School	Governing Body and staff	3:30pm - 4:30pm	14th January 2020	Bryncelynnog Comprehensive School
Ferndale Community School	Governing Body and staff	3:30pm - 4:30pm	15th January 2020	Ferndale Community School
Mountain Ash Comprehensive School	Governing Body and staff	3:30pm - 4:30pm	16th January 2020	Mountain Ash Comprehensive School

School Affected	Group-Pupils/ Staff/Parents	Time	Date	Venue
Ysgol Garth Olwg	School Council	9:30am - 10:30am	20th January 2020	Ysgol Garth Olwg
Bryncelynnog Comprehensive School	School Council	11:30am - 12:30pm	20th January 2020	Bryncelynnog Comprehensive School

Ferndale Community School	School Council	9:30am - 10:30am	21st January 2020	Ferndale Community School
Mountain Ash Comprehensive School	School Council	2:00pm - 3:00pm	21st January 2020	Mountain Ash Comprehensive School
RCT	RCT residents	4:30pm - 6:00pm	22nd January 2020	Hawthorn Leisure Centre

Interested parties are also welcome to put their views in writing to:

Director of Education and Inclusion Services
Rhondda Cynon Taf County Borough Council
Ty Trevithick
Abercynon
CF45 4UQ

Or email A&IService@rctcbc.gov.uk

Monitoring & Review

10. What arrangements have you put in place to review the actual impact of the policy once it has been implemented?

The Council's Inclusion Service will be fully engaged in supporting head teachers and governing bodies to establish the LSC provisions through its well established line management and quality assurance processes relating to its management of LSC provisions. In line with the requirements of the SEN Code of Practice and Education Act 1996, the LA will continue to keep its LSC provision under review to ensure that it meets the identified needs of its learners with SEN in RCT.

Addressing the Impact

11. What option have you chosen as a result of your impact assessment?

- Continue the Policy

Please indicate and provide reasons for your decision.

The evidence outlined in our consultation document clearly recommends that this is the right approach

12. Action Plan

You now need to complete the EIA action plan to outline how you will act on any impacts identified. You may need to prioritise in terms of what actions you choose to take and the timescales to complete them in. In general terms, you should try to act on all negative impacts unless there is a clear reason as to why this is not possible. You could also identify actions for positive or neutral impacts where appropriate i.e. to outline and further promote a positive impact or to outline how to make something have a positive impact instead of a neutral one.

Action	Responsible Officer	Timescale for Actions	Timescale and actions for Review	Measures to be taken to evaluate effects of actions
If the proposal proceeds, the LA will undertake the statutory consultation process to implement the proposals.	Head of Inclusion Services	March 2020		<ul style="list-style-type: none">Compliance to with School Organisation Code requirements.
Publish Objection Report with objection summary	Head of Inclusion Services	Before the end of 7 days beginning with the day of its determination		
To undertake any refurbishment required to accommodate the new LSC provisions	Director of Corporate Estates	September 2020		

13. Please outline below any negative impacts that have been identified in the EIA questionnaire but not addressed in the action plan. You will need to explain your reasons for not addressing them.

None.

Please keep a copy of the questionnaire and action plan and send copies to:

Equality, Diversity & Social Justice Team
The Pavilions
Cambrian Park
Clydach
CF40 2XX

Email: equality@rhondda-cynon-taf.gov.uk

Tel: 01443 424075

Signed: Gaynor Davies

Date: 7th November 2019

Job Title: Director of Education & Inclusion Services

Community Impact Assessment

This assessment is prepared in accordance with guidance contained within Annex C of the School Organisation Code statutory guidance circular 011/2018.

Proposal: To open a Key Stage 3/4 LSC provision for pupils with Social, Emotional and Behavioural Difficulties (SEBD) at Bryncelynnog Comprehensive School

Rhondda Cynon Taf (RCT) is proposing to enhance the Special Education Needs (SEN) provision within the County Borough by creating four new Learning Support Classes (LSCs). It is proposed that three classes are created to support pupils with Social, Emotional and Behavioural Difficulties (SEBD) and one Welsh medium LSC to support pupils with significant additional learning needs (ALN).

RCT County Borough Council proposes to create a Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School with effect from the 1st of September 2020. The provision will accommodate 12 pupils and placements within the LSC will agreed in the Inclusion Service SEN Panels.

This proposal will be consulted on between 10th January 2020 and 28th February 2020. A detailed consultation document will be circulated to all prescribed consultees. Copies will be forwarded to the Welsh Government in compliance with consultation and publication guidelines. The document advises of the availability of all required Impact Assessments and informs all consultees as to how they can obtain copies if they required them.

The reasons for consideration of this particular proposal are fully outlined in the consultation document that will be widely distributed; this document clearly outlines the background to the proposal and why it has been necessary to bring it forward at this point in time.

The creation of the new provision is seen as positive. The proposal will not have any significant impact on the local communities as more local children will be able to access specialist provision within their local community. The LSC will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers. The proposed establishment of LSC will enhance the overall ability of the host school to meet a diverse range of needs as there will be further specialist SEN expertise within the school.

It is anticipated that the proposal will have a significantly positive impact on the health and wellbeing of pupils with SEBD requiring specialist placement hosted by mainstream schools that can meet their identified needs.

Any services currently provided by the school to parents, pupils and the community will remain unaltered for example breakfast and after school clubs.

Transportation would be provided in line with the Council's Learner Travel Policy and placement made in the nearest and most appropriate specialist setting. If placed within LSC pupils may be required to travel out of catchment however, enhancing the number of LSCs does provide additional options.

Community Impact Assessment

This assessment is prepared in accordance with guidance contained within Annex C of the School Organisation Code statutory guidance circular 011/2018.

Proposal: To open a Key Stage 3/4 LSC provision for pupils with Social, Emotional and Behavioural Difficulties (SEBD) at Ferndale Community School

Rhondda Cynon Taf (RCT) is proposing to enhance the Special Education Needs (SEN) provision within the County Borough by creating four new Learning Support Classes (LSCs). It is proposed that three classes are created to support pupils with Social, Emotional and Behavioural Difficulties (SEBD) and one Welsh medium LSC to support pupils with significant additional learning needs (ALN).

RCT County Borough Council proposes to create a Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School with effect from the 1st of September 2020. The provision will accommodate 12 pupils and placements within the LSC will be agreed in the Inclusion Service SEN Panels.

This proposal will be consulted on between 10th January 2020 and 28th February 2020. A detailed consultation document will be circulated to all prescribed consultees. Copies will be forwarded to the Welsh Government in compliance with consultation and publication guidelines. The document advises of the availability of all required Impact Assessments and informs all consultees as to how they can obtain copies if they required them.

The reasons for consideration of this particular proposal are fully outlined in the consultation document that will be widely distributed; this document clearly outlines the background to the proposal and why it has been necessary to bring it forward at this point in time.

The creation of the new provision is seen as positive. The proposal will not have any significant impact on the local communities as more local children will be able to access specialist provision within their local community. The LSC will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers. The proposed establishment of LSC will enhance the overall ability of the host school to meet a diverse range of needs as there will be further specialist SEN expertise within the school.

It is anticipated that the proposal will have a significantly positive impact on the health and wellbeing of pupils with SEBD requiring specialist placement hosted by mainstream schools that can meet their identified needs.

Any services currently provided by the school to parents, pupils and the community will remain unaltered for example breakfast and after school clubs.

Transportation would be provided in line with the Council's Learner Travel Policy and placement made in the nearest and most appropriate specialist setting. If placed within

LSC pupils may be required to travel out of catchment however, enhancing the number of LSCs does provide additional options.

Community Impact Assessment

This assessment is prepared in accordance with guidance contained within Annex C of the School Organisation Code statutory guidance circular 011/2018.

Proposal: To open a Key Stage 3/4 LSC provision for pupils with Social, Emotional and Behavioural Difficulties (SEBD) at Mountain Ash Comprehensive School

Rhondda Cynon Taf (RCT) is proposing to enhance the Special Education Needs (SEN) provision within the County Borough by creating four new Learning Support Classes (LSCs). It is proposed that three classes are created to support pupils with Social, Emotional and Behavioural Difficulties (SEBD) and one Welsh medium LSC to support pupils with significant additional learning needs (ALN).

RCT County Borough Council proposes to create a Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School with effect from the 1st of September 2020. The provision will accommodate 12 pupils and placements within the LSC will be agreed in the Inclusion Service SEN Panels.

This proposal will be consulted on between 10th January 2020 and 28th February 2020. A detailed consultation document will be circulated to all prescribed consultees. Copies will be forwarded to the Welsh Government in compliance with consultation and publication guidelines. The document advises of the availability of all required Impact Assessments and informs all consultees as to how they can obtain copies if they required them.

The reasons for consideration of this particular proposal are fully outlined in the consultation document that will be widely distributed; this document clearly outlines the background to the proposal and why it has been necessary to bring it forward at this point in time.

The creation of the new provision is seen as positive. The proposal will not have any significant impact on the local communities as more local children will be able to access specialist provision within their local community. The LSC will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers. The proposed establishment of LSC will enhance the overall ability of the host school to meet a diverse range of needs as there will be further specialist SEN expertise within the school.

It is anticipated that the proposal will have a significantly positive impact on the health and wellbeing of pupils with SEBD requiring specialist placement hosted by mainstream schools that can meet their identified needs.

Any services currently provided by the school to parents, pupils and the community will remain unaltered, for example, breakfast and after school clubs.

Transportation would be provided in line with the Council's Learner Travel Policy and placement made in the nearest and most appropriate specialist setting. If placed within LSC pupils may be required to travel out of catchment however, enhancing the number of LSCs does provide additional options for specialist placement.

Community Impact Assessment

This assessment is prepared in accordance with guidance contained within Annex C of the School Organisation Code statutory guidance circular 011/2018.

Proposal: To open a Key Stage 3/4 LSC provision for pupils with significant Additional Learning Needs (ALN) at Ysgol Garth Olwg.

Rhondda Cynon Taf (RCT) is proposing to enhance the Special Education Needs (SEN) provision within the County Borough by creating four new Learning Support Classes (LSCs). It is proposed that three classes are created to support pupils with Social, Emotional and Behavioural Difficulties (SEBD) and one Welsh medium LSC to support pupils with significant additional learning needs (ALN).

RCT County Borough Council proposes to create a Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg with effect from the 1st of September 2020. The provision will accommodate 14 pupils and placements within the LSC will be agreed in the Inclusion Service SEN Panels.

This proposal will be consulted on between 10th January 2020 and 28th February 2020. A detailed consultation document will be circulated to all prescribed consultees. Copies will be forwarded to the Welsh Government in compliance with consultation and publication guidelines. The document advises of the availability of all required Impact Assessments and informs all consultees as to how they can obtain copies if they required them.

The reasons for consideration of this particular proposal are fully outlined in the consultation document that will be widely distributed; this document clearly outlines the background to the proposal and why it has been necessary to bring it forward at this point in time.

The creation of the new provision is seen as positive. The proposal will not have any significant impact on the local communities as more local children will be able to access specialist provision within their local community. The LSC will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers. The proposed establishment of LSC will enhance the overall ability of the host school to meet a diverse range of needs as there will be further specialist SEN expertise within the school.

It is anticipated that the proposal will have a significantly positive impact on the health and wellbeing of pupils with significant ALN attending Welsh medium provision as it will enhance the current inclusive model provided by the specialist Welsh medium peripatetic team and will address the current gap in provision.

The Lifelong Learning Centre on the site of Ysgol Garth Olwg provides a significant amount of community facilities and these will be unaffected. Any services currently provided by the school to parents, pupils and the community will remain unaltered, for example, Urdd, breakfast and after school clubs.

Transportation would be provided in line with the Council's Learner Travel Policy and placement made in the nearest and most appropriate specialist setting. If placed within LSC pupils may be required to travel out of catchment however, enhancing the number of LSCs does provide additional options for specialist placement.



Consultation on the

ENHANCEMENT OF LEARNING

SUPPORT CLASS PROVISION WITHIN

RHONDDA CYNON TAF

November 2019

Table of Contents

Section 1

- Introduction
- Who will we consult?
- What will the consultation process entail?
- What do you now have to consider?
- How do you make your views known?

Section 2

- Background
- Overview of the Proposals
- What is the basis for this proposal?
- What is the educational case for the proposal to re-align Learning Support Classes?
- What are the financial implications of the proposal?
- What is the likely impact of the proposal on school pupils?
- What is the likely impact of the proposal on the staff of the Learning Support Classes?
- What is the likely impact of the proposals on the local communities?
- What are the disadvantages of these proposals?
- What alternative options have been considered?
- Community, Equality and Welsh Language Impact Assessments.

Section 3

- Proposed New Provisions
- Background to the proposed opening of new Learning Support Classes
- Information on schools affected by the proposals

Appendices

- Appendix 1: Consultation Response Pro-form
- Appendix 2: Welsh Impact Assessment
- Appendix 3: Equality Impact Assessment
- Appendix 4: Community Impact Assessments

Section 1

Introduction

Rhondda Cynon Taf (RCT) County Borough Council wishes to seek the views of a wide range of stakeholders on proposals to enhance mainstream Learning Support Class (LSC) provision within RCT.

The proposals seek to address the increase in exclusions and the demand for specialist Social, Emotional and Behavioural Difficulties (SEBD) placement in Key Stage 3/4 and the need to create Welsh medium specialist LSC provision, in line with the requirements of the Additional Learning Needs Education Tribunal (ALNET) Act 2018 to provide a bilingual Additional Learning Needs (ALN) system.

The proposals seek to achieve the following aims to:

- enhance the continuum of provision that effectively addresses the need for specialist SEBD provision within Key Stage 3/4;
- create a specialist LSC provision for Welsh medium Key Stage 3/4 pupils with significant ALN;

To achieve these aims, the proposals for change include:

Proposed development of new provisions

It is proposed that four LSCs for Key Stages 3/4 are established in September 2020:

- Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School accommodating 12 pupils;
- Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School accommodating 12 pupils;
- Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School accommodating 12 pupils ;
- Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg accommodating 14 pupils.

Who will we consult?

We are seeking the views of the following stakeholders:

- The Governing Bodies, parents, carers and staff of the following schools: Bryncelynnog Comprehensive, Ferndale Community, Mountain Ash Comprehensive School and Ysgol Garth Olwg
- Governing Bodies, parents/carers of pupils attending primary schools within the catchment area of the proposed host secondary schools
- The Church in Wales and Roman Catholic Diocesan Authorities
- The Governing Body of Coleg Y Cymoedd
- The Governing Body of the University of South Wales
- Welsh Ministers including Welsh Minister for Education and Skills
- Menter Iaith

- Assembly Members and members of Parliament for all constituencies and regional areas serving Rhondda Cynon Taf
- Estyn
- Cwm Taf Morgannwg Local Health Board
- Teaching and Support staff trade unions
- Central South Consortium Joint Education Service
- South Wales Police and Crime Commissioner
- The Early Years and Childcare Partnership
- South East Wales Transport Association
- The local Communities First Partnerships
- The Welsh Language Commissioner
- Neighbouring local authorities
- SNAP Cymru

What will the consultation process entail?

The consultation will start on the 10th January 2020 and will be completed at 5pm on 28th February 2020. Feedback from the consultation will be collated and summarised and a report presented to the Council's Cabinet in March 2020. This consultation report will be available for all persons to view on the Council website and copies can be obtained on request from the address detailed on www.rctcbc.gov.uk.

The Council's Cabinet will consider the report, based on the feedback, and decide whether to proceed with the proposal, make changes to the proposal or not to proceed with the proposal. If the Cabinet decides not to proceed, that will be the end of this proposal for the foreseeable future.

If the Cabinet decides to proceed with the proposal Statutory Notices will be published in April 2020 providing a 28 day notice period for objections.

The School Organisation Code (011/2018) requires that anyone wishing to make objections to a school organisation proposal has the opportunity to do so. To be considered as statutory objections, objections **must** be made in writing or by email, and sent to the Council within 28 days of the date on which the proposal was published.

If there are objections, the Council's Director of Education & Inclusion Services will publish an objection report providing a summary of the objections and her response to them within 7 days of the determination decision by the Council's Cabinet. This report will also be available for all persons to view on the Council's website and copies can be obtained on request from the address detailed in Appendix 1.

If the Council's Cabinet approve the proposal, the proposal will be implemented in accordance with the date given in the statutory notice or any subsequently modified date. In the case of this proposal, the implementation date is the 1st of September 2020.

What do you now have to consider?

The remainder of the consultation document sets out the rationale for the proposed additional LSC provision within RCT.

We would like you to consider the information contained within this document and to hear your views as to whether or not you support the proposals.

How do you make your views known?

A consultation questionnaire is attached (Appendix 1), and is also available on the Council's internet site at www.rctcbc.gov.uk. The questionnaire also enables consultees to register their wish to be notified of the publication of the consultation report to the Council's Cabinet. Schools will also be offered opportunities to consult with pupils and are advised to consult with School Council representatives to seek pupil views. You are also welcome to put your views in writing to:

Director of Education and Inclusion Services, Education Directorate, Ty Trevithick, Abercynon CF45 4UQ

Telephone: (01443) 744333

E-mail: A&IService@rctcbc.gov.uk

Fax: (01443) 744024

All correspondence should be received no later than the 28th February 2020.

Please note that responses to the consultation will not be counted as objections to the proposal. Objections can only be forwarded following the publication of the Statutory Notice. The consultation documentation will be distributed in both English and Welsh. Consultation events will be held and you are welcome to attend the appropriate meetings.

Consultation Events

The following consultation meetings are to be held:

School Affected	Group	Time	Date	Venue
Ysgol Garth Olwg	Governing Body and staff	3:30pm - 4:30pm	13 th January 2020	Ysgol Garth Olwg
Bryncelynnog Comprehensive School	Governing Body and staff	3:30pm - 4:30pm	14 th January 2020	Bryncelynnog Comprehensive School
Ferndale Community School	Governing Body and staff	3:30pm - 4:30pm	15 th January 2020	Ferndale Community School
Mountain Ash Comprehensive School	Governing Body and staff	3:30pm - 4:30pm	16 th January 2020	Mountain Ash Comprehensive School

School Affected	Group	Time	Date	Venue
Ysgol Garth Olwg	School Council	9:30am - 10:30am	20 th January 2020	Ysgol Garth Olwg
Bryncelynnog Comprehensive School	School Council	11:30am - 12:30pm	20 th January 2020	Bryncelynnog Comprehensive School
Ferndale Community School	School Council	9:30am - 10:30am	21 st January 2020	Ferndale Community School
Mountain Ash Comprehensive School	School Council	2:00pm - 3:00pm	21 st January 2020	Mountain Ash Comprehensive School
RCT	RCT residents	4:30pm - 6:00pm	22 nd January 2020	Hawthorn Leisure Centre

Section 2

Background

RCT has an excellent range of SEN provisions which allows the majority of pupils to attend schools near to where they live. These include 44 LSCs attached to mainstream settings, 4 special schools and 2 Pupil Referral Units (PRUs). RCT does not currently have special school provision solely for SEBD, although Maesgwyn Special School does have learners with complex learning and SEBD. In addition to this, £3.4M is made available via delegated Additional Needs Funding (ANF) annually to support pupils with severe and persistent needs in mainstream settings. This is in line with RCT's vision for inclusive education and the right for children with SEN to be educated in their local mainstream school where appropriate.

The Special Educational Needs (SEN) Code of Practice for Wales (2002) provides detailed guidance on the duties and responsibilities of local authorities (LAs) in meeting the SEN of children and young people. Children and young people have SEN if they have a learning difficulty which calls for a special educational provision to be made for them. A learning difficulty is evident when children and young people have:

- significantly greater difficulty in learning than the majority of children and young people of the same age; or
- a disability which prevents or hinders them from making use of educational facilities of a kind generally provided for children and young people of the same age in schools within the area of the locality.

The SEN Code of Practice for Wales (2002) recommends that early years and school settings adopt a graduated response to meeting SEN. A graduated response means that progressively greater expertise and support can be brought in to address the difficulties a child or young person may be experiencing. Additional or different provision should be made at Early Years/School Action, Early Years/School Action Plus or a Statement of SEN depending on the severity of the child/young person's level of need.

Section 316A of the Education Act 1996 specifies that children with SEN should normally be educated in mainstream schools so long as this is compatible with them receiving the special educational provision that their learning difficulty calls for, the efficient education of other children, and the efficient use of resources. For those pupils who have very significant needs, more specialist placements are required and this might result in a placement in one of our specialist provisions. These placements are agreed by the Inclusion Service panels.

Despite the wide range of LSC provisions attached to mainstream schools, in light of the requirements of the ALNET Act 2018 and the continuing concerns regarding rising exclusions and an increase in requests for SEBD placement it is felt necessary to enhance the current LSC provision to address the above issues.

Data analysis confirms that:

- there is currently insufficient SEBD provision in the secondary sector;

- there is no specialist LSC provision to meet the needs of learners of Welsh medium pupils.

In the context of the above, the proposals for change seek to achieve the following aims:

- to enhance the continuum of provision that effectively addresses the need for specialist SEBD provision within Key Stage 3/4;
- to create a specialist LSC provision for Welsh medium Key Stage 3/4 pupils with significant ALN;

Overview of the Proposals

RCT County Borough Council wishes to seek the view of a wide range of stakeholders on the proposal to proceed with establishing four new LSCs provisions with effect from the 1st September 2020:

- Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School;
- Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg.

What is the basis for this proposal?

Section 315 of the Education Act 1996 requires LAs to regularly review arrangements for supporting pupils with SEN and to ensure that provision is sufficient and meets the needs of its communities. Exclusion and positive physical intervention data clearly suggests that there has been a significant increase in the level of challenging behaviour displayed in our schools. Demand for specialist placements far outstrips supply and a dramatic growth (290%) in learning support class placement referrals for SEBD has been evident in the last 5 years.

The priority for the Education and Inclusion Service Directorate is to continue to focus on driving up standards in schools and to improve the outcomes for all children and young people. In light of the Welsh Government ALN Transformation Agenda and the Council's vision to increase the number of Welsh medium learners in its schools by responding proactively to both national and local strategies, such as the Welsh Government Welsh Language Strategy: Cymraeg 2050, Rhondda Cynon Taf's Welsh in Education Strategic Plan and the current 21st Century Schools plan to increase and improve Welsh medium provision RCT, it is essential to enhance current Welsh medium ALN provision within RCT.

The proposed additional LSCs will ensure that the LA has an enhanced focus on providing more effective mainstream inclusion opportunities for pupils with SEBD and

for Welsh medium pupils with significant ALN. The importance of mainstream inclusion for pupils with SEN is reflected in the revised Estyn Common Inspection Framework which highlights that judgements of achievement for all learners including those with additional learning needs should take account of progress made in relation to agreed learning goals from individual starting points. The framework also recognises the positive impact that the expertise within a LSC can have on enhancing practice and improving outcomes for learners with SEN across the whole school. The proposals ensure efficient use of resources and a more equitable continuum of provision for pupils with significant SEN.

What is the educational case for the proposal to create additional LSC provision?

The advantages of implementing the proposed changes includes:

- an enhanced focus on improved mainstream LSC provision which provides improved life chances for our most vulnerable learners
- appropriate continuum of provision which is well matched to pupils' primary needs
- compliance with one of the underpinning principles of the SEN Code of Practice for Wales that all pupils should access mainstream education where possible
- improved educational outcomes and pupil engagement due to effectively meeting pupil needs
- greater opportunities for mainstream inclusion in local community schools
- ensuring that LSC provision is situated within education settings that are accessible and appropriate for the needs of pupils with wide ranging needs, including physical and medical needs
- improving the range and quality of facilities and learning resources available to the benefit of all pupils
- compliance with a core aim of ALNET Act to create a bilingual ALN system.
- the enhanced LSC provisions are being hosted by schools that have the capacity for the development of additional classes due to surplus spaces and can accommodate the additional pupils who will be placed in the schools.

What are the financial implications of the proposal?

The LA proposal if agreed will have a positive impact on pupils with SEN across RCT as it will mean that the funding will be directed to establish provisions that address areas of growing need. The proposal will ensure that the County Borough Council continues in its commitment to meeting the needs of learners with SEN effectively by addressing gaps in existing provision this improving the quality of provision within Rhondda Cynon Taf.

The schools will be delegated sufficient funding to establish the proposed provisions. These costs will cover staffing and capitation. The proposals do not involve any transfer or disposal of land.

The creation of four LSCs will incur a transportation cost in line with the Council's Learner Travel Policy. However, this increase in cost is seen as a necessity in order to enhance provision for RCT's most vulnerable pupils. Costs cannot be predicted at

this time as placements are pupil led. However, placement panel will always seek to place a pupil in the nearest LSC that meets their ALN needs.

What is the likely impact of the proposal on school pupils?

It is anticipated that the proposals will have a significantly positive impact on pupils with SEBD requiring specialist placement and Welsh medium pupils with significant ALN by providing an inclusive model of specialist provision hosted by mainstream schools that can meet their identified needs within their local community.

Transportation would be provided in line with the Council's Learner Travel Policy and placement made in the nearest and most appropriate specialist setting. If placed within LSCs pupils may be required to travel out of catchment however, enhancing the number of LSCs does provide additional options.

The Welsh Government and the Council has adopted the UN Convention on the Rights of the Child which is expressed in seven core aims that all children and young people:

1. Have a flying start in life;
2. Have a comprehensive range of education and learning opportunities;
3. Enjoy the best possible health and are free from abuse, victimisation and exploitation;
4. Have access to play, leisure, sporting and cultural activities;
5. Are listened to, treated with respect, and have their race and cultural identity recognised;
6. Have a safe home and a community which supports physical and emotional wellbeing;
7. Are not disadvantaged by poverty.

We consider that this proposal benefits children in their communities in accordance with the seven core aims set out above.

What is the likely impact of the proposal on the staff of the LSC?

There will be no negative impact on existing LSC staff as current LSCs will be unaffected by the proposals. The proposal will have a positive impact creating four teaching and eight non-teaching LSC posts, providing development opportunities for existing staff.

What is the likely impact of the proposal on the local communities?

A Community Impact Assessment has been completed and is included as an appendix. This proposal will not have any significant impact on the local communities as more local children will be able to access specialist provision within their local community and the new provisions will address a gap in existing provision. The schools will make effective use of any surplus space within the school and develop a resource that will be of benefit to vulnerable children and young people, and their parents/carers.

The proposed establishment of LSCs will enhance the overall capacity of the host schools to meet a diverse range of needs as there will be further specialist SEN expertise within the school.

In addition, Equality Impact and Welsh Language Assessments have been completed for this proposal and are attached as appendices. These will be updated after the consultation has been completed to ensure that they include pertinent issues that have arisen and need to be taken into account. The assessments will be presented to the Council's Cabinet in the report that sets out the consultation feedback received in respect of this proposal.

What are the disadvantages of these proposals?

Implementing this plan will be of benefit to pupils with SEBD and Welsh medium pupils with significant ALN across RCT and will ensure greater equality and access to specialist provision.

The creation of new LSCs could potentially cause some limited disruption to mainstream schools hosting the LSCs for a period of time. However, it is recognised that hosting a specialist LSC provision has a positive impact on enhancing practice and improving outcomes for pupils with SEN across the whole school.

The Council considers that the educational advantages of the proposals outweigh the short-term impact of the changes for the pupils and parents.

What alternative options have been considered?

In light of the requirements of the ALNET Act and concerns regarding rising exclusions and an increase in requests for SEBD placement to do nothing would mean that RCT would not be meeting its statutory requirement to meet the identified ALN of some of its most vulnerable pupils.

There is clearly identified need for this provision within RCT and it would be in children and young people's interest to address this. Some consideration was given to re-directing resources to further enhance the capacity of mainstream schools to meet need in local community schools. However, in so doing this could make the continuum of provision more fragmented which could in turn enhance pressures for special school and PRU placements.

Whilst alternative options have been considered, these have not been pursued given the obvious benefits of implementing these changes. Alternative secondary schools could be approached to establish a specialist provision. However, Bryncelynnog Comprehensive, Ferndale Community, Mountain Ash Comprehensive Schools and Ysgol Garth Olwg were selected because of their inclusive practice and success in supporting pupils with SEN in the mainstream and surplus capacity. Furthermore, the location of the settings will address local need. Establishing these provisions will reduce the demand for special school/PRU placements which can then be safeguarded for pupils with more complex learning, medical and physical needs. However, it is anticipated that through effective early intervention and prevention the

demand for high end placements should diminish. A further review of PRU provision in the County will be undertaken in due course.

Community, Equality and Welsh Language Impact Assessments

Community Impact, Equality Impact and Welsh Language Assessments have been prepared in respect of this proposal and are attached as appendices. Copies will also be published on the Council's website hard copies can be obtained by emailing a request to A&IService@rctcbc.gov.uk or by telephoning 01443 744333.

Section 3

Proposed New Provisions

RCT County Borough Council proposes to create the following new LSCs provision with effect from the 1st of September 2020:

- Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School accommodating 12 pupils;
- Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School accommodating 12 pupils;
- Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School accommodating 12 pupils ;
- Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg accommodating 14 pupils,

Background to the opening of new LSC's

Improving the quality of education and raising standards is one of the Council's key priorities. It is considered that improving standards and educational outcomes for some of our most vulnerable pupils will improve their life chances, access to the world of work and other education pathways. Ensuring that our provisions are well matched to the needs of pupils is central to pupils achieving positive outcomes.

One of the main targets outlined in the Council's Welsh in Education Strategic Plan (WESP) is to increase the number of children receiving education through the medium of Welsh, which will assist the local authority in working towards the Cymraeg 2050 Welsh Government target of having 1 million people in Wales able to speak Welsh by 2050. We consider that this proposal will address the existing lack of Welsh medium LSC provision, allowing Welsh medium pupils with significant ALN to remain in a Welsh medium education setting and work towards the Council's WESP. Rising exclusion rates within RCT is a cause for concern. The development of three specialist SEBD provisions is aiming to address this concern and that of the increasing demand for SEBD Secondary LSC provision.

The LSCs will be located within mainstream schools with appropriate accommodation. By locating specialist provision within mainstream settings, pupils will have the opportunity for increased inclusion. This is supported by the Estyn Common Inspection Framework, which highlights the positive impact that the expertise within a LSC can have on enhancing practice and improving outcomes for learners with SEN across the whole school.

The LA currently has LSCs within 8 of the 17 middle/secondary provisions with two LSCs for pupils with SEBD at Pontypridd High School and Ysgol Nant Gwyn. The additional three LSCs will enhance current provision by providing specialist LSCs across the County Borough. The establishment of the Welsh medium LSC for pupils with significant ALN will address a current gap in LSC provision.

Information on schools affected by the proposals

Bryncelynnog Comprehensive School

General Information

Bryncelynnog Comprehensive School is located at Penycodcae Road, Beddau, Pontypridd, CF38 2AE. The school is a 11-18 aged mixed English medium comprehensive school. The building site is a mix of building and designs ranging from a Victoria building to CLASP to a relatively new build. The LA's building condition survey reports the school as a category C+. The school currently has a LSC for pupils with Autistic Spectrum Disorder (ASD).

Pupil Projections

The pupil numbers and forecast information for Bryncelynnog Comprehensive from 2019-2021 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Bryncelynnog Comprehensive are calculated in accordance with guidance issued by Welsh Government.

School Name	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Bryncelynnog Comprehensive School	1046	1044	1088	1126	1179	1207	1248	1283	1307	1297

Capacity: 1442

Quality and Standards

Bryncelynnog Comprehensive School was last inspected by Estyn in February 2016. The inspection comments are summarised as follows:

The school's current performance	Adequate
The school's prospects for improvement	Good

Bryncelynnog Comprehensive has been categorised as a green school. This defines them as 'effective, already doing well, know the areas needed to improve, and by identifying the right support and taking action have the potential to do even better'.

It should be noted that figures in the table above are based on the most recent published PLASC figures and do not reflect the changes that will come into effect in September 2022 when the sixth form capacity at Bryncelynnog Comprehensive will increase. These changes will come into effect following a recent school organisation consultation, the outcome of which was determined by Cabinet in July 2019.

Mountain Ash Comprehensive School

General Information

Mountain Ash Comprehensive School is located at New Road, Mountain Ash, CF45 4DG. The school is an 11-18 aged mixed English medium comprehensive school. The building is modern and in good repair. The LA's building condition survey reports the school as a category B. The school does not currently have LSC provision.

Pupil Projections

The pupil numbers and forecast information for Mountain Ash Comprehensive School from 2019-2021 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Mountain Ash Comprehensive School are calculated in accordance with guidance issued by Welsh Government.

Pupil Numbers and forecast information:

School Name	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Mountain Ash Comprehensive School	837	859	862	879	930	1008	1067	1082	1082	1093

Capacity:1414

Quality and Standards

Mountain Ash Comprehensive School was last inspected by Estyn in November 2018. The inspection comments are summarised as follows:

Inspection area	Judgement
Standards	Adequate and needs improvement
Wellbeing and attitudes to learning	Adequate and needs improvement
Teaching and Learning Experiences	Adequate and needs improvement
Care, support and guidance	Good
Leadership and Management	Adequate and needs improvement

Mountain Ash Comprehensive has been categorised as an amber school.

Ferndale Community School

General Information

Ferndale Community School is located Excelsior Terrace, Maerdy, Ferndale, CF43 4AR. The school is a 11-16 aged mixed English medium comprehensive school. The building is of good repair. The LA's building condition survey reports the school as a category B, on a site that has benefited from modernisation through the 21st Century School Modernisation Programme. The school currently has a LSC provision for pupils with Complex Learning Difficulties.

Pupil Projections

The pupil numbers and forecast information for Ferndale Community School from 2019-2021 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Ferndale Community School are calculated in accordance with guidance issued by Welsh Government.

Pupil Numbers and forecast information:

School Name	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Ferndale Community School	636	608	555	579	589	595	619	617	631	678

Capacity: 650

Quality and Standards

Ferndale Community School was last inspected by Estyn in October 2017. The inspection comments are summarised as follows:

Inspection area	Judgement
Standards	Excellent
Wellbeing and attitudes to learning	Good
Teaching and Learning Experiences	Good
Care, support and guidance	Good
Leadership and Management	Good

Ferndale Community School has been categorised as a yellow school.

Ysgol Garth Olwg

General Information

Ysgol Garth Olwg is located Main Road, Church Village, Pontypridd, CF38 1DX. The school is a newly created 3 – 19 Welsh medium provision and is situated on a site that has benefited from the 21st Century School Modernisation Programme. The LA's building condition survey reports the school as a category A. The school does not currently have LSC provision.

Pupil Projections

The pupil numbers and forecast information for Ysgol Garth Olwg from 2019-2021 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Ysgol Garth Olwg are calculated in accordance with guidance issued by Welsh Government. The numbers shown exclude nursery age pupils, as required by Welsh Government's Statutory School Organisation Code.

Pupil Numbers and forecast information:

School Name	2014/15	2015/16	2016/17	2018/19	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Ysgol Garth Olwg 11-16	801	807	803	810	813					
Ysgol Garth Olwg 3-16						1183	1210	1208	1237	1230

Capacity: Secondary 1110, Primary 324

Quality and Standards

As this is a new education setting there are no Estyn reports currently available. This proposal does not adversely impact any children as it is proposed that the provision is established to meet an identified need.

Ysgol Garth Olwg has been categorised as a yellow school.

The proposal will ensure that the current gap in secondary LSC provision for learners with SEBD and Welsh Medium pupils with significant ALN is addressed.

Consultation Response Pro-forma

In order to help the Council reach a decision, it would be very helpful if you could answer the following questions. Completed questionnaires should be returned to:

Director of Education and Inclusion Services, Access and Inclusion Service, Ty Trevithick, Abercynon, CF45 4UQ or by fax to 01443 744333, or email to A&IService@rctcbc.gov.uk

Proposal 1: Creation of 3 Social, Emotional and Behavioural Difficulties (SEBD) Learning Support Classes with effect from the 1st of September 2020:

- Key Stage 3/4 LSC provision for pupils with SEBD at Bryncelynnog Comprehensive School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Ferndale Community School;
- Key Stage 3/4 LSC provision for pupils with SEBD at Mountain Ash Comprehensive School;

1a. Do you agree with the proposal? Yes No Not sure

Please let us know the reasons for your choice

Proposal 2: Creation of a Welsh medium Learning Support Class with effect from the 1st of September 2020:

- Key Stage 3/4 LSC provision for pupils with significant ALN at Ysgol Garth Olwg.

1b. Do you agree with the proposal? Yes No Not sure

Please let us know the reasons for your choice

2. Please state any alternative options or additional views or points which you would like to be taken into account (attach additional sheets if necessary)

3. How you feel the proposal could impact opportunities for people to use and promote the Welsh Language (Positive or Negative) and if in any way it treats the Welsh Language less favourably than the English Language?

Positive or negative

4. Please state how positive effects could be increased, or negative effects be decreased?

Please indicate who you are (e.g. parent of a pupil at named school, governor at named school etc.)

Name (Optional). Please provide contact details if you wish to be notified of publication of the consultation report

Thank you for taking the time to complete this questionnaire. Please forward completed questionnaires to the above address no later **than 5pm on the 28th February 2020**. The Council is committed to keeping your personal information safe and secure and keeping you informed about how we use your information. To learn about how your privacy is protected and how and why we use your personal information to provide you with services, please visit our Consultation privacy notice here: www.rctcbc.gov.uk/serviceprivacynotice and the Council's **data protection** pages here: www.rctcbc.gov.uk/dataprotection.
