



CYFLAWNI **TEGWCH** A RHAGORIAETH MEWN **ADDYSG** A **GWELL LLES** I BAWB

**EQUITY** AND **EXCELLENCE** IN **EDUCATION** AND **ENHANCED WELLBEING** FOR ALL

# **CONSULTATION ON THE PROPOSALS TO ENHANCE ADDITIONAL LEARNING NEEDS MAINSTREAM LEARNING SUPPORT CLASS PROVISION WITHIN RHONDDA CYNON TAF**

**September 2024**

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# Section 1

## Introduction

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

The proposals will address capacity pressures in relation to pupils with significant Additional Learning Needs (ALN) in the Early Years, Social Communication Needs / Autistic Spectrum Disorder (ASD) in the Primary Phase and Complex Learning Difficulties in the Secondary Phase, reduce the number of transitions necessary for pupils accessing Primary Phase Social Communication Needs/ ASD LSC provision and ensure a higher number of LSCs are situated within 21<sup>st</sup> Century School environments. The proposal is made in accordance with the Welsh Government's School Organisation Code 2018 (011/2018).

The proposals seek to achieve the following aims:

- reducing unnecessary transition across schools by establishing cross phase specialist provisions within individual schools where possible
- developing a robust continuum of provision that effectively addresses a wide range of need across all year groups and builds upon effective early intervention and prevention approaches.
- establishing LSC provisions in fully accessible settings that provide a learning environment fit for the 21<sup>st</sup> Century
- enhancing specialist Early Years and Social Communication Needs / ASD provisions to facilitate the learning of pupils with significant ALN in the Primary Phase
- enhance specialist Secondary Phase LSC provision for pupils with Complex Learning Difficulties.

To achieve these aims, the proposals include:

### ***i. Proposed development of new provisions***

It is proposed that the following classes are established to take effect from September 2025:

- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School.
- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyrenglyn Primary School.
- One LSC for pupils in Reception – Year 2 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Hirwaun Primary School
- One Complex Learning Difficulties LSC provision for pupils in Years 7–11 at Mountain Ash Comprehensive School.

### ***ii. Proposed relocation***

It is proposed that the following class is relocated to take effect from September 2025:

- The LSC for pupils Years 3-6 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Penywaun Primary School is moved to Hirwaun Primary School to create a through provision in the Primary Phase

It is proposed that the above relocation of LSC is undertaken to ensure cross phase provision on a single site in premises which are accessible and equipped to meet a range of needs.

The proposals will ensure compliance with the Equality Act 2010 and relocation to new and significantly improved premises which have benefited from the considerable 21<sup>st</sup> Century Schools Modernisation Programme investment.

## **Who will we consult with?**

We are seeking the views of the following stakeholders:

- The Governing Bodies, parents/carers and staff of the respective schools.
- Governing Bodies, parents/carers of pupils attending primary schools within the catchment area of the proposed host secondary school
- 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
- Mudiad Meithrin
- Flourish Cymru
- 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 30<sup>th</sup> September 2024 and will be completed at 5pm on 15th November 2024. Feedback from the consultation will be collated and summarised and a report presented to the Council's Cabinet in December 2024. 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](http://www.rctcbc.gov.uk).

The Council's Cabinet will consider the report, based on the feedback, and decide whether to proceed with the proposals, 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 these proposals for the foreseeable future.

If the Cabinet decides to proceed with the proposals, Statutory Notices will be published in January 2024 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 these proposal, the implementation date is September 2025.

### **What do you now have to consider?**

The remainder of the consultation document sets out the rationale for the enhancement of the current LSC provision.

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 proposal.

### **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](http://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 entitled to put your views in writing to:

**Director of Education and Inclusion Services,  
Education Directorate,  
The Innovation Centre,  
Abercynon  
CF45 4SN**

**Telephone: (01443) 744333      E-mail: [A&IService@rctcbc.gov.uk](mailto:A&IService@rctcbc.gov.uk)**

All correspondence should be received by 5pm on 15th November 2024

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 meeting.

## Consultation Events

The following consultation events have been arranged:

School Affected	Group-Pupils/ Staff/Parents	Time	Date	Venue
<b>Mountain Ash Comprehensive School</b>	<b>School Council</b>	<b>12:30 – 13:15pm</b>	<b>Monday 4<sup>th</sup> November 2024</b>	<b>Mountain Ash Comprehensive School</b>
	<b>Parents</b>	<b>14:15 – 15:00pm</b>		
	<b>Staff/Governing Body</b>	<b>15:30 – 16:15pm</b>		
<b>Cwmaman Primary School</b>	<b>School Council</b>	<b>13.15 – 14.00pm</b>	<b>Tuesday 5<sup>th</sup> November 2024</b>	<b>Cwmaman Primary School</b>
	<b>Parents</b>	<b>14.30 – 15.15pm</b>		
	<b>Staff/Governing Body</b>	<b>15.45 – 16.30pm</b>		
<b>Penywaun Primary School</b>	<b>School Council</b>	<b>13:30 – 14:15pm</b>	<b>Wednesday 6<sup>th</sup> November 2024</b>	<b>Penywaun Primary School</b>
	<b>Parents</b>	<b>14:15 – 15:00pm</b>		
	<b>Staff/Governing Body</b>	<b>15:30 – 16:15pm</b>		
<b>Hirwaun Primary School</b>	<b>School Council</b>	<b>13:30 – 14:15pm</b>	<b>Thursday 7<sup>th</sup> November 2024</b>	<b>Hirwaun Primary School</b>
	<b>Parents</b>	<b>14:15 – 15:00pm</b>		
	<b>Staff/Governing Body</b>	<b>15:30 – 16:15pm</b>		
<b>Penyreglyn Primary School</b>	<b>School Council</b>	<b>13:15 – 14.00pm</b>	<b>Wednesday 13<sup>th</sup> November 2024</b>	<b>Penyreglyn Primary School</b>
	<b>Parents</b>	<b>14:15 – 15:00pm</b>		
	<b>Staff/Governing Body</b>	<b>15:15 – 16:00pm</b>		

## **The views of children and young people**

RCTCBC has acknowledged that the voice of children and young people is about involving them as active participants in the development, delivery, management, and improvement of their educational experience.

Children and young people have a right to express their views in all matters affecting them and for their views to be heard and considered in accordance with their age and maturity. As such, RCTCBC's Directorate of Education and Inclusion Services & 21<sup>st</sup> Century Schools Team will ensure that suitable arrangements are made to involve children and young people as active participants throughout this consultation process, and if a decision is made to progress the proposal, throughout the implementation process.

RCTCBC will consult with the children and young people who attend:

- Hirwaun Primary School.
- Penywaun Primary School
- Cwmaman Primary School
- Penyreglyn Primary School
- Mountain Ash Comprehensive School

This will be done by producing a children and young people's version of the Consultation Document and Consultation Response Form. As detailed on page 5, RCTCBC will hold a meeting with the School Councils in each of the affected schools. Feedback from these meetings will be collated and summarised, and a Consultation Report will be presented to RCTCBC's Cabinet for consideration once the consultation period has ended.

## **Community, Equality and Welsh Language Impact Assessments**

Community Impact, Equality Impact and Welsh Language Assessments have been prepared in respect of the proposals 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](mailto:A&IService@rctcbc.gov.uk) or by telephoning 01443 744333.

## Section 2

### Background

RCT has an excellent range of ALN provisions which allows the majority of pupils to attend schools near to where they live. These include 48 LSCs attached to mainstream settings, 4 Special Schools and 2 Pupil Referral Units (PRUs).

In addition to this, £7.25M is delegated Enhanced Capacity Funding (ECF) 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 ALN to be educated in their local mainstream school where appropriate.

The Additional Learning Needs Education Tribunal (ALNET) Act provides detailed guidance on the duties and responsibilities of local authorities (LAs) in meeting the ALN of children and young people. Children and young people have ALN if they have a learning difficulty which calls for an additional learning 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 ALN Code for Wales (2021) recommends that Early Years and school settings adopt a graduated response to meeting ALN. 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 depending on the severity of the child/young person's level of need.

Section 316A of the Education Act 1996 specifies that children with ALN should normally be educated in mainstream schools so long as this is compatible with them receiving the additional learning 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 Access & Inclusion Service panels.

Despite the wide range of LSC provisions attached to mainstream schools, it has become increasingly apparent that the range of LSC provisions currently available is disproportionate to the level of need in some areas (e.g. Complex Learning Difficulties, Early Years, Social Communication Needs / ASD). In view of this, an in-depth data analysis exercise was undertaken to inform proposals. Based on this analysis and the requirements of the ALNET Act (2018) it is felt necessary to enhance the current LSC provision to address the current gap in provision and to ensure the LA complies with its new legislative duty.

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



- To enhance current Primary Phase provision to match the current profile of needs of children with ALN.
- To reduce the number of transitions between placements for some of our most vulnerable pupils.
- To enhance Early Years provision to meet the rising demands for early intervention.
- To enhance Secondary Phase provision to meet the needs of older pupils requiring support with their learning

## **Overview of the Proposal**

RCT County Borough Council wishes to seek the view of a wide range of stakeholders on the proposals to:

- To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School. The proposal will take effect from September 2025.
- To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyreglyn Primary School. The proposal will take effect from September 2025.
- To establish one LSC for pupils in Years 7-11 with Complex Learning Needs at Mountain Ash Comprehensive School taking effect from September 2025.
- To relocate the LSC for pupils Years 3-6 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School taking effect from September 2025.
- To establish one LSC for pupils in Reception – Year 2 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Hirwaun Primary School to create a through provision in the Primary Phase taking effect from September 2025.

## **What is the basis for this proposal?**

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

The proposed enhancement of LSCs will ensure that the LA has an enhanced focus on providing more effective mainstream inclusion opportunities for pupils with a wide range of ALN. The proposals ensure that the best possible use of resources and a more equitable continuum of provision is achieved for pupils with significant ALN.

The importance of mainstream inclusion for pupils with ALN is reflected in the Estyn Common Inspection Framework which highlights that judgements of achievement for all pupils 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 pupils with ALN across the whole school.

The proposals provide an effective local solution and provision for pupils with significant ALN without the need to travel long distances across the county borough to access appropriate LSC provision.

## **Proposed Creation of New LSC Provision**

RCT County Borough Council proposes to create the following new LSCs provision with effect from the 1<sup>st</sup> of September 2025:

- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School.
- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyreglyn Primary School.
- One LSC for pupils in Reception – Year 2 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Hirwaun Primary School.
- One Complex Learning Difficulties LSC provision for pupils in Years 7–11 at Mountain Ash Comprehensive School.

## **Background to the proposed opening of new LSCs**

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.

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 pupils with ALN across the whole school.

The proposal to increase secondary phase (Year 7 – 11) provision addresses the increasing demand for secondary LSC provision and the imbalance between the number of LSCs within mainstream primary and secondary settings. The proposal to increase the number of Early Years LSCs addresses the ongoing increase in demand for specialist placements for children under statutory school age. The proposal to increase the number of primary phase LSCs for pupils with Social Communication Needs / ASD addresses the growth in demand for primary phase specialist provisions for pupils with significant presenting needs.

In light of the requirements of the ALNET Act to do nothing would mean that RCT would not be meeting its statutory duty 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 best 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.

## **Information on the schools affected by the proposals**

## **Hirwaun Primary School**

Hirwaun Primary School is located on Glannant Street, Hirwaun, Aberdare, CF49NF. The brand new school opened in 2020 so has benefited from significant 21<sup>st</sup> Century investment. The school is an English Language category school.

### **Pupil Projections**

The pupil numbers and forecast information for Hirwaun Primary School from 2019/20 to 2028/29 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Hirwaun Primary School 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:

<b>Hirwaun Primary</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>2024/2025</b>	<b>2025/2026</b>	<b>2026/2027</b>	<b>2027/2028</b>	<b>2028/2029</b>
School Total (N1-Y6)	248	264	272	272	275	275	272	262	263	244
Total (R-Y6)	211	217	237	233	233	238	237	228	233	216

Capacity: 394

### **Quality and Standards**

The school was inspected in February 2018 comments were summarised as follows:

<b>Inspection area</b>	<b>Judgement</b>
<b>Standards</b>	<b>Adequate and needs improvement</b>
<b>Wellbeing and attitudes to learning</b>	<b>Adequate and needs improvement</b>
<b>Teaching and learning experiences</b>	<b>Unsatisfactory and needs urgent improvement</b>
<b>Care, support and guidance</b>	<b>Good</b>
<b>Leadership and management</b>	<b>Adequate and needs improvement</b>

Hirwaun Primary School received a follow up inspection by Estyn in July 2019 following which Estyn reported: *Hirwaun Primary School is judged to have made sufficient progress in relation to the recommendations following the most recent core inspection. As a result, Her Majesty's Chief Inspector of Education and Training in Wales is removing the school from the list of schools requiring significant improvement.*

The school has made excellent progress since the initial inspection in 2018.

If the proposal is progressed, the new LSC will provide capacity of 8 placements for primary phase pupils with Social Communication Needs/ASD. However, it is worth noting given the size of the planned classrooms this could be increased with the right staffing in situ in future.

### **Cwmaman Primary School**

Cwmaman Primary School is located at Glanamman Road, Cwmaman, Aberdare, CF44 6LA. The school is an English Language category school.

#### **Pupil Projections**

The pupil numbers and forecast information for Cwmaman Primary School from 2019/20 – 2028/29 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Cwmaman Primary School 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:

<b>Cwmaman Primary</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>2024/2025</b>	<b>2025/2026</b>	<b>2026/2027</b>	<b>2027/2028</b>	<b>2028/2029</b>
School Total (N1-Y6)	231	226	208	214	205	196	189	177	155	148
Total (R-Y6)	199	196	173	191	188	172	169	160	140	134

Capacity: 239

#### **Quality and Standards**

The school had a very positive inspection in March 2024 and were given only one recommendation. That being *to improve teacher feedback to ensure that pupils understand and can act upon the next steps in their learning*. The inspection report states: *The headteacher is a compassionate leader and his approach to developing an inclusive and caring school is greatly appreciated by parents, staff and pupils*.

The proposal will ensure that the current gap in Early Years provision for pupils with significant ALN is addressed. If the proposal is progressed, the new Early Years Intervention LSC will provide an optimum capacity of 8 placements for pre-statutory school aged pupils with significant presenting needs.

### **Penyrenghlyn Primary School**

Penyrenghlyn School is located Baglan Street, Treherbert, Treorchy, CF42 5AW. The school is an English Language category school.

#### **Pupil Projections**

The pupil numbers and forecast information for Penyrenghlyn Primary School from 2019/20 – 2028/29 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Penyrenghlyn Primary School 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:

<b>Penyrenghlyn Primary</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>2024/2025</b>	<b>2025/2026</b>	<b>2026/2027</b>	<b>2027/2028</b>	<b>2028/2029</b>
School Total (N1-Y6)	192	203	188	187	186	183	179	180	153	145

Total (R-Y6)	158	178	167	161	166	163	157	160	135	130
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Capacity: 246

### Quality and Standards

The school received a positive inspection in November 2023 during which inspectors noted the progress being made by then then newly appointed headteacher. The inspection report states:

- Penynglyn Community Primary School is an inclusive, caring school that places a high priority on the importance of developing positive relationships with staff, pupils, parents and the wider community.*
- During their time at school, many pupils, including those with additional learning needs (ALN), make good progress from their individual starting points in developing their oracy, reading and numeracy skills.*

The proposal will ensure that the current gap in Early Years provision for pupils with significant ALN is addressed. If the proposal is progressed, the new Early Years Intervention LSC will provide capacity of 8 placements for pre-statutory school aged pupils with significant presenting needs.

### Mountain Ash Comprehensive School

Mountain Ash Comprehensive School (MACS) is located New Road, Mountain Ash, CF45 4DG. The school is an English Language category school.

### Pupil Projections

The pupil numbers and forecast information for Mountain Ash Comprehensive School from 2019/20 – 2028/29 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. The numbers shown exclude nursery age pupils, as required by Welsh Government's Statutory School Organisation Code.

Pupil Numbers and forecast information:

MACS	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029
School Total (Yr 7-Y11)	885	929	928	900	899	838	850	851	864	831
Total (Yr 7 - 13)	973	1019	1023	983	981	928	934	931	942	913

Capacity: 1394

### Quality and Standards

Estyn undertook an inspection of the school in November 2018. Following the inspection the school were placed in the category of Estyn Review. In March 2021 sufficient progress had been made and the school were removed from the category. Significant improvements have been made since 2018.

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

If the proposal is progressed, then the school will host a LSC providing 14 placements for pupils in Years 7–11 with Complex Learning Difficulties and will ensure that the current gap in secondary LSC provision for pupils with Complex Learning Needs is addressed.

## **Proposed Learning Support Class Relocation**

It is proposed that the following class is relocated to take effect from September 2025:

- The LSC for pupils Years 3-6 with Social Communication Needs / Autistic Spectrum Disorder (ASD) at Penywaun Primary School is moved to Hirwaun Primary School to create a through provision in the Primary Phase

## **Background to the proposed relocation of the Learning Support Class**

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.

It is proposed that relocation of the LSC is undertaken to premises which are more accessible and better equipped to meet a range of needs. The proposals will ensure greater compliance with the Equality Act 2010 and relocation to brand new premises which have built as part of the 21<sup>st</sup> Century Schools Modernisation Programme and investment. The proposal will minimise unnecessary transition for pupils with significant needs, provide continuity in their educational placements and ensure that a higher number of RCT's specialist LSC provisions provide equity for pupils in LSCs so that they remain in one setting until transition to secondary provision.

## **Information on school affected by the proposal**

Information on Penywaun Primary School is below with the relevant information for Hirwaun Primary School previously referenced.

### **Penywaun Primary School**

Penywaun Primary School is located at Coed Glas, Penywaun, Aberdare, CF44 9DR. The school is an English Medium provision and is situated in a modern brick and block style building. It is in good repair. The school currently has 1 LSC designated to support 10 pupils in Years 3-6 for pupils with Social Communication Needs / ASD.

## Pupils Projections

The pupil numbers and forecast information for Penywaun Primary School from 2019/20 – 2028/29 are shown below and are obtained from the statutory PLASC which is undertaken in January each year. The pupil forecasts for Penywaun Primary School 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. However, we have shown the nursery capacity separately.

Pupil Numbers and forecast information:

<b>Penywaun Primary</b>	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>2024/2025</b>	<b>2025/2026</b>	<b>2026/2027</b>	<b>2027/2028</b>	<b>2028/2029</b>
School Total (N1-Y6)	199	202	187	191	191	201	208	215	224	222
Total (R-Y6)	178	179	166	168	157	175	183	190	202	202

Capacity of the school: 253

Penywaun Primary School was last inspected by Estyn in March 2017. The inspection comments are summarised as follows:

<b>The school's current performance</b>	<b>Adequate</b>
<b>The school's prospects for improvement</b>	<b>Adequate</b>

Following the inspection the school were placed in the category of Estyn Review. In December 2018 sufficient progress had been made and the school were removed from the category.

## What alternative options have been considered?

In light of the requirements of the ALNET Act to do nothing would mean that RCT would not be meeting its statutory duty 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 best 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.

In accordance with the Welsh Government's School Organisation Code 2018 (011/2018), alternative options were identified and consciously considered. Some of the benefits and disadvantages of each of the discounted options are listed in the table that follows.

<b>Option</b>	<b>Benefit</b>	<b>Disadvantages</b>
Retain the status quo.	<ul style="list-style-type: none"> <li>No RCTCBC investment required.</li> <li>No disruption to a very small number of pupils,</li> </ul>	<ul style="list-style-type: none"> <li>The Council would not be able to continue to meet its statutory duties to meet the needs of pupils whose ALN</li> </ul>



Option	Benefit	Disadvantages
	<p>parents / carers and staff.</p> <ul style="list-style-type: none"> <li>• No impact on home to school transport.</li> </ul>	<p>cannot be met through mainstream school-based additional learning provision and who require access to specialist LSC provision.</p> <ul style="list-style-type: none"> <li>• A potential increase in the number of highly costly appeals lodged by parents/ carers to Education Tribunal Wales</li> <li>• An increase in the requirement for very costly out of county specialist placements</li> <li>• Pupils having to access specialist provisions outside of their local community</li> <li>• Pupils would continue to experience a higher number of transitions than mainstream peers in the primary phase – not equitable with mainstream peers.</li> </ul>
Consider enhancing provisions existing schools LSC within host	<ul style="list-style-type: none"> <li>• No short-term disruption to the small number of pupils attending the primary phase LSC for Social Communication Needs / ASD at Penywaun Primary</li> <li>• No short-term disruption to the new host schools</li> <li>• No impact upon the staff working in the LSC for Social Communication Needs / ASD at Penywaun Primary</li> <li>• No impact on home to school transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Limitations of some current host schools in terms of physical environment would restrict the ability to enhance the capacity of the LSCs within a fully accessible environment fit for the 21<sup>st</sup> Century with appropriate outdoor facilities</li> <li>• Significant Welsh Government Sustainable Communities for Learning investment required – there is currently no funding allocated for this.</li> <li>• Lack of surplus capacity in some host schools would mean that it would not be possible to increase the number of LSCs within those schools</li> <li>• The benefits of addressing surplus capacity within high quality school environments that have received</li> </ul>



Option	Benefit	Disadvantages
		<p>significant investment from the Welsh Government Sustainable Communities for Learning programme to ensure high quality provision for pupils requiring LSC provision would not be realised</p> <ul style="list-style-type: none"> <li>• There would continue to be a lack of specialist provision in some areas of the county borough, requiring pupils to travel long distances outside of their local community to access LSC provision</li> </ul>

Whilst alternative options have been considered, these have not been pursued given the obvious benefits of implementing these changes. These are summarised as follows:

- *Proposed new provisions:* alternative schools could be approached to establish a specialist provision. However, Hirwaun Community Primary School, Penyreglyn Primary School, Cwmaman Primary School and Mountain Ash Comprehensive School sites were selected because of their inclusive practice and success in supporting pupils with ALN/SEN in the mainstream and/or significant investment from the 21<sup>st</sup> Century Schools Modernisation Programme. Furthermore, the location of the settings will address local needs. Establishing these provisions will reduce the demand for special school placements which can then be safeguarded for pupils with more complex learning, medical and physical needs.
- *Proposed relocation:* the proposed relocation has been specifically selected as it allows for greater opportunities for ALN pupils to access high quality cross phase educational provision within an accessible school environment that has benefited from school modernisation and investment programmes.

## What are the benefits and disadvantages, risks and mitigation factors to the proposals?

The proposals will ensure greater equality and access to specialist provision for pupils with significant and complex ALN who require specialist placement.

Any proposals involving school reorganisation will inevitably cause some disruption and uncertainty, although experience shows that this can be kept to a minimum through meaningful engagement throughout the consultation process, and if a decision is made to progress with the proposal, during the implementation phase.

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

The benefits and disadvantages of the proposal are highlighted in the table that follows, as is information as to how any identified risks can be managed.

<b>Benefits</b>
Increasing the number of LSCs hosted by mainstream schools will ensure a greater number of pupils with significant and complex ALN will have enhanced opportunities for mainstream inclusion.
Increasing the number of mainstream schools that host LSCs will enhance practice and bring additional expertise for all pupils with ALN across these schools.
Increasing the number of LSCs for pupils in Early Years, Primary phase pupils with Social Communication Needs / ASD and secondary phase pupils with complex ALN will address the growth in demand for specialist placements and ensure that pupils can access appropriate ALN provision.
Establishing a new Early Years LSC and a new secondary phase LSC will significantly enhance LSC provision in the Cynon district enabling pupils to access specialist LSC provision within their local community.
Establishing a new Early Years LSC at Penyreglyn Primary School will ensure that pre-school children at the top of the Rhondda Fawr who require specialist LSC provision can access LSC provision within their local community without the need to travel long distances.
Enabling pupils with significant and complex ALN to access LSC provision within their local community will reduce the need to travel longer distances across the county borough to access appropriate provision, supporting the Welsh Government's Delivery Plan for a Low Carbon Wales. Hirwaun and Cwmaman Primary Schools have also been built to BREEAM Excellent standards, and have EPC ratings of A, Hirwaun Primary has EV chargers on site, contributing to the delivery of RCTCBC's Tackling Climate Change Strategy: 2022 to 2025 – Think Climate Rhondda Cynon Taf and as close as possible to being carbon neutral as a County Borough by 2030.
Establishing a new primary phase Reception – Year 2 LSC for pupils with Social Communication Needs / ASD in Hirwaun Primary and relocating the primary Years 3 – 6 LSC for pupils with Social Communication Needs / ASD to Hirwaun Primary will increase the available specialist provision for Rec- Year 2 pupils in line with the identified increase demand for specialist placements and minimise unnecessary transition for pupils with significant ALN, providing continuity in their educational placement and equity for pupils in LSCs in line with their mainstream peers to remain in one primary phase setting until transition to secondary provision.
Three of the new LSCs will be hosted by schools that have benefited from Sustainable Communities for Learning capital investment. Attending a new 21 <sup>st</sup> century standard school will result in significant improvement to the quality of the educational provision for pupils requiring specialist placement, having a significant positive impact upon their educational performance. All proposed locations for the LSCs are fully accessible.
<b>Disadvantages</b>
Some current Penywaun Primary School LSC pupils and staff may live further from the new school site at Hirwaun Primary. However, staff working in the LSC at Penywaun Primary School are centrally employed by Access and Inclusion and, therefore, according to the Terms and Conditions of their contract of employment, can be required to relocate to work at any school within the Local Authority.
The proposed relocation of the LSC from Penywaun Primary will cause some disruption for a small number of pupils currently accessing the LSC.
There will be an impact upon Penywaun Primary of removing a valued LSC from its school community. The school will continue to access support from Access and Inclusion to meet the ALN of its mainstream cohort.

There will be an increase in both home to school transport costs as well as costs to establish and maintain the new provisions which will be met by RCTCBC.

Moving to a new school site could cause some anxiety for some pupils, staff, and parents / carers.

There will be some short-term impact upon the new host mainstream schools. Access and Inclusion will provide support and guidance to host schools in relation to both the initial setting up of the LSCs, recruitment / relocation of staff and ongoing funding and quality assurance of provision.

<b>Risks</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigating Action(s)</b>
<b>Approval</b> – Parents / carers choose not to send their children to the relocated LSC provision for pupils with social, communication needs / ASD at Hirwaun Primary.	Medium	Medium	<ul style="list-style-type: none"> <li>• RCTCBC's Directorate of Education, Inclusion Services and 21<sup>st</sup> Century Schools Team will ensure that suitable arrangements are made to involve parents / carers and children and young people as active participants throughout this consultation process, and if a decision is made to progress the proposal, throughout the implementation process.</li> <li>• Access and Inclusion will work with the families of pupils directly affected by the proposals to put in place robust transition plans to move to the relocated LSC at Hirwaun Primary, working collaboratively with parents and school-based staff and involving additional support from specialist members of staff from Access and Inclusion.</li> </ul>
<b>Home to School Transport</b> – Increased home to school transport costs.	Medium	Low	<ul style="list-style-type: none"> <li>• Any revenue implications that arise as a result of home to school transport will fall to RCTCBC. Neither the school nor the parents / carers of pupils who will require home to school transport as a result of the proposals will be impacted.</li> </ul>

			<ul style="list-style-type: none"> <li>Pupils accessing LSCs will be entitled to home to school transport in line with the Council's Pupil Travel Policy and placement made in the nearest most suitable appropriate specialist setting.</li> </ul>
<p><b>Impact upon mainstream host schools –</b> short term disruption of initial setting up of LSC and ongoing organisation / line management and impact upon current LSC staff</p>	Medium	Medium	<ul style="list-style-type: none"> <li>New host schools will be fully funded for any set-up costs incurred such as minor adaptations to the physical environment, resources and equipment for the LSCs. Schools will receive an annual budget for ongoing costs.</li> <li>There are well established collaborative working practices and agreed protocols between the LA's Access and Inclusion Service and LSCs to ensure schools are supported with the line management of the LSCs and also to ensure the quality of the learning provision is kept under review.</li> <li>LSC staff are employed centrally by Access and Inclusion and can be relocated to different school settings according to the requirements of the LA, in line with the Terms and Conditions of their contract of employment.</li> <li>Staff will be kept informed of any updates or decisions made, as will any relevant Trade Unions. RCTCBC has well established Human Resource policies and procedures that give reassurance to staff and employers about the</li> </ul>

			management of organisational change.
<b>Community Impact</b>	Low	Low	<ul style="list-style-type: none"> <li>• A higher number of pupils will be able to access specialist provision within their local communities.</li> <li>• The LSCs will make effective use of surplus space within host schools and develop a resource that will be of benefit to vulnerable pupils and their parents / carers.</li> <li>• There will be a positive impact upon the health, wellbeing and educational outcomes for pupils who can access appropriate specialist LSC provision within their locality</li> <li>• A higher number of mainstream schools will benefit from additional ALN expertise within their school settings that will benefit pupils with ALN across the school community.</li> </ul>

## The Welsh in Education Strategic Plan

All Local Authorities in Wales must produce a Welsh in Education Strategic Plan (WESP). The WESP is a long-term language planning tool which sets the direction for the strategic planning, delivery and growth in Welsh medium and Welsh language education. Through the WESP, and effective strategic planning and investment, the RCTCBC aims to contribute significantly to achieving the vision of one million people in Wales being Welsh speakers by 2050 as set out in the Welsh Government's Cymraeg 2050. RCTCBC's current WESP can be viewed and downloaded from RCTCBC's website via the following link:

<https://www.rctcbc.gov.uk/EN/Resident/SchoolsandLearning/SchoolAdmissions/relateddocuments/WESPJune2022.pdf>

There are seven outcomes within RCTCBC's WESP which will help RCTCBC to achieve the targets set, one of which is:

- More opportunities for pupils to use Welsh in different contexts in school.

RCTCBC aims to embed positive habits and attitudes towards the Welsh language through purposeful planning to promote the informal use the Welsh language amongst pupils inside and

outside school. All schools identified in the proposal currently support this aim and encourage pupils to use incidental Welsh wherever possible. Pupils attending LSCs are encouraged to use incidental Welsh and planning for Welsh in the curriculum is monitored as part of the quality assurance of the educational provision within the LSCs. This is aligned to the LA's action plan under Outcome 6 of the WESP that relates specifically to ALN. Pupils will continue to be encouraged to use the Welsh language when accessing a LSC.

A Welsh Language Impact Assessment for this proposal has been written and is included within the consultation documentation. This is available on the Council's website.

## **Section 3**

### **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 pupils;
- appropriate continuum of provision which is well matched to pupils' primary needs;
- 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;
- LSC provisions hosted by schools that have the capacity for the development of an additional class due to surplus spaces and can accommodate the additional pupils who will be placed in the school.

### **The impact on ALN Provision and how the proposals will contribute to enhancing to enhancing the quality of education and support for children with ALN**

#### **What is the likely impact of the proposals on school pupils?**

It is anticipated that the proposals will have a significantly positive impact on pupils with significant ALN by providing an inclusive model of specialist provision hosted by mainstream schools whereby pupils have their needs met 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 a LSC pupils may be required to travel out of catchment although Access & Inclusion will endeavour to place pupils in the nearest appropriate LSC to their home address.

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?**

All LSC staff are appointed by the LA and are contracted to work in any appropriate LSC provision. This is subject to the needs of the LA and the skills set of the staff in question. Any additional necessary resources will be provided to support the relocated provisions.

The proposals will enhance opportunities for those wishing to work within LSC provisions by creating 4 LSC teaching posts and 5 learning support assistant LSC posts.

### **What is the likely impact of the proposal on the local community?**

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

- *Proposed relocation:* the proposed host school has sufficient capacity to provide enhanced opportunities to access high quality cross phase educational provision in modern and accessible school buildings.
- *Proposed new provisions:* 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 ALN expertise within the school.

Welsh Language and Equality Impact Assessments have been completed for these proposals and are attached in appendices 2 and 3. A Community Impact Assessment has been completed and is included as appendix 4.

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 the proposals.

### **What is the likely impact on quality and standards in education?**

The LSCs are collaboratively line managed by the host headteacher and central Access & Inclusion staff. Roles and responsibilities of the above are clearly defined in the LA School Learning Support Class Agreement, this includes matters relating to the curriculum and the quality of teaching and learning. There is a robust quality assurance process in place to ensure both the school and LSC staff are well supported and that LSC provision meets all necessary statutory requirements.



It is the LA's view that the proposals will have a positive impact on all five Estyn inspection areas, as detailed below:

### **Standards**

The LSCs will be located in modern flexible learning environments and have access to enhanced outdoor spaces to support the full range of curriculum activities. In addition, increasing the number of LSCs will ensure that a greater number of pupils with significant and complex ALN have access to additional learning provision that enhances their progress in relation to their individual targets and starting points. This is monitored through the LSC Quality Assurance process in collaboration with the head teacher.

### **Wellbeing and attitudes to learning**

Access to specialist learning provisions where the individual needs of pupils with complex ALN can be met through individualised additional learning provision within 21<sup>st</sup> century environments will have a positive impact upon pupil and staff wellbeing. Increasing the specialist provision hosted by mainstream schools will enable pupils with ALN to play a full part in the life and work of the school alongside their mainstream peers.

LSC provision designed to provide specialist additional learning provision will ensure increased participation and engagement of pupils in their learning and promote resilience. This will be achieved by detailed bespoke planning in line with the identified needs of pupils.

### **Teaching and learning experience**

The LSCs will provide a balanced curriculum at all stages in line with the Curriculum for Wales – 2022. A 21<sup>st</sup> century learning environment will also provide pupils with greater flexibility and therefore greater choice and opportunities in their learning experience. The LSCs will provide a range of strategies and interventions to meet the needs of individual pupils with significant difficulties with access to a wide range of multi-sensory and digital resources to enhance their learning. Bespoke assessment and planning to meet individual needs for example through LA maintained Individual Development Plans (IDPs) will ensure that pupils make progress from individual starting points. Establishing additional LSCs will increase opportunities for the sharing of expertise and experience in ALN between the LSC staff and mainstream staff in a larger proportion of mainstream schools in RCT, to support effective practice in meeting the needs of pupils with ALN across the wider school community and enhancing opportunities for effective inclusion.

### **Care, support and guidance**

LSCs will have a strong focus upon supporting pupils' emotional and social needs and opportunities to work collaboratively with mainstream peers in their host mainstream schools. This will include opportunities to access activities within their local community. Pupils will be supported to participate in a range of extra-curricular activities to encourage healthy lifestyles and nurture pupils.

### **Leadership and management**

Leadership and management of LSCs is undertaken collaboratively by the hosting Headteacher and Learner Support Service Co-ordinators in the Access & Inclusion Service to ensure high expectations for pupils are achieved. This is supported by a comprehensive quality assurance process and a LA / School LSC agreement that details respective roles and responsibilities of the LA, host schools and LSC staff.

## **What are the financial implications of the proposal?**

The LA proposal if agreed will have a positive impact on pupils with ALN across RCT as it will mean that additional funding will be directed to establish provisions that address identified areas of need. The proposal will ensure that the County Borough Council continues in its commitment to meeting the needs of pupils with ALN effectively by future proofing its existing provision in terms of quality and sufficiency.

The schools will be delegated sufficient funding to establish the proposed provision. It is estimated that should the proposals be actioned then the cost to the LA will be approx £474k. This funding will cover staffing and capitation costs. The proposal does not involve any transfer or disposal of land.

## **Home to School Transport**

The creation of the new 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 given that there will be a net increase in the number of LSC provisions additional costs will be incurred.

There is a statutory duty placed upon all local authorities in Wales to provide pupils with free transport to their nearest suitable school if they reside beyond safe 'walking distance' to that school. The term suitable school applies to the catchment area English, Welsh, dual language or voluntary aided mainstream primary school, secondary school or special school/class as appropriate. The law relating to safe 'walking distance' is defined as two miles for pupils of compulsory school age receiving primary education and three miles for pupils of compulsory school age receiving secondary education.

RCTCBC has exercised the discretionary powers afforded to it under the provisions of the Learner Travel (Wales) Measure 2008 to make a more generous provision to pupils as set out below:

- The eligibility criterion for walking distance for pupils receiving compulsory primary education at their nearest suitable school has been set at 1½ miles, instead of 2 miles as required by the Measure.
- Free transport to their nearest suitable school, where places are available, is provided to pupils who meet the 1½ mile eligibility criterion from the start of Foundation Phase (the start of the school term after their third birthday), rather than from the start of compulsory education (the start of the school term after their fifth birthday) as required by the Measure.
- The eligibility criterion for walking distance for learners receiving compulsory secondary education at their nearest suitable school has been set at 3 miles (with effect from September 2025) as required by the Measure.
- The term suitable school applies to the catchment area English, Welsh, dual language or voluntary aided (faith) mainstream school or special school/class as appropriate.

Further information in relation to the RCTCBC's Home to School transport provision for pupils with ALN can be viewed and downloaded from RCTCBC's website via:

<https://www.rctcbc.gov.uk/EN/Resident/ParkingRoadsandTravel/Travel/SchoolandCollegeTransport/SchoolandCollegeTransport.aspx>

## 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, The Innovation Centre, Abercynon, CF45 4SN, or by email to [A&IService@rctcbc.gov.uk](mailto:A&IService@rctcbc.gov.uk)

This survey is anonymous, please do not provide any personal information in the free text boxes.

### Proposal 1: Establishment of Learning Support Class Provision

It is proposed that the following class is **established** to take effect from September 2025 at:

- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School.

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

Please let us know the reasons for your choice

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### Proposal 2: Establishment of Learning Support Class Provision

It is proposed that the following class is **established** to take effect from September 2025 at:

- One Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyrenghlyn Primary School.

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

Please let us know the reasons for your choice

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### Proposal 3: Establishment of Learning Support Class Provision

It is proposed that the following classes are **established** to take effect from September 2025 at:

- One LSC for pupils in Reception – Year 2 with Autistic Spectrum Disorder at Hirwaun Primary School

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

Please let us know the reasons for your choice

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#### Proposal 4: Establishment of Learning Support Class Provision

It is proposed that the following class is **established** to take effect from September 2025 at:

- One Complex Learning Difficulties LSC provision for pupils in Years 7–11 at Mountain Ash Comprehensive School.

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

Please let us know the reasons for your choice

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#### Proposal 5: The relocation of the following LSC

It is proposed that the following class is **relocated** to take effect from September 2025:

- To relocate the LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School, creating a Primary Phase provision.

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

Please let us know the reasons for your choice

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

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8. Under the Equality Act 2010 and the Public Sector Equality Duties, the Council has a legal duty to look at how its decisions impact on people because they may have particular characteristics. How would the Council's proposal affect you because of your:

- a. Sex
- b. Age
- c. Ethnicity
- d. Disability
- e. Sexuality
- f. Religion / Belief
- g. Gender identity
- h. Relationship status
- i. Pregnancy
- j. Preferred language

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9. With regards to the Council's proposal, and the impact it may have, please let us know: If you feel it 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?

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

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

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**Thank you for taking the time to complete this questionnaire.  
The deadline for all responses is 5pm on 15<sup>th</sup> November 2024.**

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

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Thank you for taking the time to complete this questionnaire. Please forward completed questionnaires to the above address no later **than 5pm on the 15<sup>th</sup> November 2024**. 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](http://www.rctcbc.gov.uk/serviceprivacynotice) and the Council's **data protection** pages here: [www.rctcbc.gov.uk/dataprotection](http://www.rctcbc.gov.uk/dataprotection).

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## APPENDIX 2 WELSH LANGUAGE IMPACT ASSESSMENT TOOL

This Welsh Language Impact Assessment (WLIS) tool enables RCT Council to consider the principles and requirements of the [Welsh Language Standards \(No.1\) Regulations 2015](#) to ensure compliance with the [Welsh Language \(Wales\) Measure 2011](#).

### **Stage 1 – Information Gathering**

**NOTE:** As you complete this tool you will be asked for **evidence to support your views**. Please see [Welsh Language Impact Assessment Guidance](#) for more information on data sources.

<b>Proposal Name:</b>	<b>CONSULTATION ON THE PROPOSALS TO ENHANCE ADDITIONAL LEARNING NEEDS MAINSTREAM LEARNING SUPPORT CLASS PROVISION WITHIN RHONDDA CYNON TAF</b>
<b>Department</b>	Access & Inclusion Service
<b>Service Director</b>	Gaynor Davies
<b>Officer Completing the WLIA</b>	Lisa Carter
<b>Email</b>	Lisa.c.carter@rctcbc.gov.uk
<b>Phone</b>	01443 744344
<b>Brief Description</b>	<p>To enhance current Learning Support Class (LSC) provision to meet the demand for specialist placements. This will be achieved by the following:</p> <ul style="list-style-type: none"> <li>• To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School. The proposal will take effect from September 2025.</li> <li>• To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyreglyn Primary School. The proposal will take effect from September 2025.</li> <li>• To establish one LSC for pupils in Years 7-11 with Complex Learning Needs at Mountain Ash Comprehensive School taking effect from September 2025.</li> <li>• To relocate the LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School taking effect from September 2025.</li> </ul>

	<ul style="list-style-type: none"> <li>To establish one LSC for pupils in Reception – Year 2 with Autistic Spectrum Disorder at Hirwaun Primary School to create a through provision in the Primary Phase taking effect from September 2025.</li> </ul>
<b>Date</b>	4 <sup>th</sup> September 2024
<b>Please outline who this proposal affects? (Service Users, Employees, Wider Community)</b>	Pupils with Additional Learning Needs requiring specialist provision, their parents/carers and the wider additional learning needs community.

<b>What are the aims of the policy, and how do these relate to the Welsh Language?</b>	<p>Section 315 of the Education Act 1996 requires LAs to regularly review arrangements for supporting pupils with SEN/ALN and to ensure that provision is sufficient and meets the needs of its communities. 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.</p> <p>The proposals will address surplus capacity issues and a lack of capacity in key provisions allowing resources to be directed to enhance capacity for mainstream inclusion, early intervention and preventative approaches. In addition, the proposals will address the current imbalance between the number of primary and secondary provisions, transition and accessibility issues. The proposals also seeks to address the need to create additional Early Years specialist LSC provision to meet the increase in demand for pre-statutory school age placements.</p> <p>As the proposed LSC changes are to enhance English medium provision for pupils with Complex Learning Difficulties (CLD), Social Communication Needs/ASD, and Early Years pupils with significant ALN, Welsh medium education will be unaffected in this proposal. It is noted that RCT has recently opened 3 new Welsh medium LSC provisions for pupils with significant additional learning needs (Sept 24), demand for Welsh medium provision is being closely monitored.</p> <p>As per the proposals, additional Learning Support Class Teachers and Assistant vacancies will be created. All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to further their skills by undertaking levels 2 and 3.</p>
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<p><b>Who will benefit / Could the policy affect Welsh language groups?</b> <b>If so, list them here.</b></p>	<ul style="list-style-type: none"><li>• Primary Phase English medium pupils with Social Communication Needs/ASD</li><li>• Early Years pre-statutory school age pupils presenting significant needs.</li><li>• Year 7- 11 (formerly Key Stage 3/4) English medium pupils with CLD.</li><li>• Pupils at the hosting schools</li><li>• Parent/carers of pupils attending hosting schools and those with children/young people with significant additional learning needs</li><li>• Staff at hosting schools</li><li>• The hosting schools are: Cwmaman Primary School, Penyrenglyn Primary School, Mountain Ash Comprehensive School and Hirwaun Primary School.</li></ul>									
<p><b>Current linguistic profile of the geographical area(s) concerned</b></p>	<p>The 2021 Census figures regarding the Welsh language show a decrease in the percentage of Welsh speakers across Wales to 17.8%. There was, however, a small increase in RCT – the percentage of the population of the county borough who can speak Welsh increased from 12.3% to 12.4%. Numerically, RCT saw a 2.8% increase in the number of Welsh speakers in the county borough, from 27,779 speakers to 28,556 speakers. RCT was also one of only four LAs in Wales to see an increase in the percentage of Welsh speakers – the others were Cardiff, the Vale of Glamorgan and Merthyr Tudful. All of these are neighbouring county boroughs, which could demonstrate that our region is seeing some positive trends in terms of increases in Welsh speakers, and that there may be a resulting increase in demand for services through the medium of Welsh. As further, more detailed, data from the Census becomes available for RCT (e.g. LSOA data), we will need to consider what impact it may have on the services we provide.</p> <p>The table that follows illustrates the Welsh language skills of residents living in the County Borough of Rhondda Cynon Taf and is obtained from the 2021 Census.</p> <table><caption><b>Table 1: Welsh Language Skills of Residents – (%)</b></caption><tr><th></th><th><b>Total Residents Living in the County Borough of Rhondda Cynon Taf</b></th><th><b>All Wales</b></th></tr><tr><td><b>Can Speak, Read and Write Welsh</b></td><td>10.1%</td><td>14.8%</td></tr><tr><td><b>Can Speak and Read but Cannot Write Welsh</b></td><td>0.7%</td><td>1.2%</td></tr></table>		<b>Total Residents Living in the County Borough of Rhondda Cynon Taf</b>	<b>All Wales</b>	<b>Can Speak, Read and Write Welsh</b>	10.1%	14.8%	<b>Can Speak and Read but Cannot Write Welsh</b>	0.7%	1.2%
	<b>Total Residents Living in the County Borough of Rhondda Cynon Taf</b>	<b>All Wales</b>								
<b>Can Speak, Read and Write Welsh</b>	10.1%	14.8%								
<b>Can Speak and Read but Cannot Write Welsh</b>	0.7%	1.2%								



	<b>Can Speak but Cannot Read or Write Welsh</b>	1.4%	2.4%
	<b>Can read but cannot speak or write Welsh</b>	1.6%	1.4%
	<b>Can write but cannot speak or read Welsh</b>	0.2%	0.2%
	<b>Can read and write but cannot speak Welsh</b>	0.5%	0.6%
	<b>Can Understand Spoken Welsh Only</b>	4.0%	5.5%
	<b>Other Combination of Skills</b>	0.1%	0.2%
	<b>No Skills</b>	81.3%	77.1%
	<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>
	<p>The data demonstrates that the Welsh language skills level of residents living in RCT is mostly lower than the all-Wales Welsh language skills level.</p> <p>In recent years, support has been given to promote and increase pupils use of the Welsh language in primary and secondary schools and in social contexts. This has been done through the Welsh Language Charter (Siarter Iaith), developed by Gwynedd Council, and various other projects, in partnership with the Central South Consortium Joint Education Service (CSCJES) and the Urdd. This could contribute towards the Welsh Government's ambitious goal of creating a million Welsh speakers in Wales by 2050 and the WESP.</p>		
<b>Other relevant data or research</b>	<p>Currently RCT hosts 2 Primary Phase Welsh medium LSCs in YGG Awel Taf with a total capacity of 18 pupils with significant presenting needs. RCT also hosts a Key Stage 3/4 Welsh medium LSC in Ysgol Garth Olwg with a capacity of 14 pupils with significant presenting needs. By establishing these provisions, there has been a realised benefit to Welsh medium pupils with significant ALN across RCT and ensured greater equality and access to specialist provision. 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</p>		

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 21<sup>st</sup> Century Schools plan to increase and improve Welsh medium provision RCT.

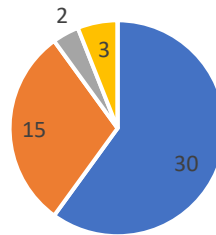
A proforma was distributed to all RCT LSC teachers and support staff to complete and state what level of Welsh Language Competency they were currently at. When completing the proforma, the LSC teachers and support staff were asked to use RCT's Welsh Language Level Guidelines<sup>1</sup> to refer to the criteria of a Welsh Language Competency Level before stating what level they were. The data is accurate as of 20/06/2023. An important consideration however is that this data was collected prior to the appointment of 4 Learning Support Assistants and 3 Learning Support Class Teachers fully fluent in Welsh as of Summer 2024.

Figure 1 – RCT LSC teacher and support staff data.

Welsh Language Competency Level	Number of Staff
Level 1	96
Level 2	18
Level 3	4
Level 4	5
Level 5	1
<b>TOTAL</b>	<b>124</b>

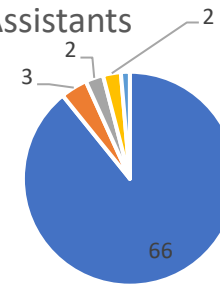
<sup>1</sup> <https://www.rctcbc.gov.uk/CY/Council/WelshServices/Relateddocs/WelshLanguageSkillLevels.pdf>

Teachers



■ Level 1 ■ Level 2 ■ Level 3 ■ Level 4 ■ Level 5

Teaching Assistants



■ Level 1 ■ Level 2 ■ Level 3 ■ Level 4 ■ Level 5

Figure 2 - RCT LSC teacher and teaching assistant Welsh Language Competency Levels.

- Of the 50 LSC teacher responses, 60% are currently at Welsh Language Competency Level 1. This contrasts with the teaching assistants where 89% of the responses indicate that the teaching assistants are currently at Welsh Language Competency Level 1.
- 30% of the LSC teacher responses indicate a Welsh Language Competency Level of 2 compared to 4% of the teaching assistants.
- 2% of the teachers are currently at Welsh Language Competency Level 3 with 3% of the LSC teaching assistants reporting the same.
- 6% of the teachers indicate a Welsh language Competency Level of 4 with 3% of the teaching assistants reporting the same.
- There are no teachers currently at Welsh Language Competency Level 5 although 1 teaching assistant has identified that they are at this competency level.

## **Stage 2 – Impact Assessment**

In this section you need to consider the impact, the evidence and any action you are taking for improvement. This is to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language (Wales) Measure 2011.

Please note there is a separate impact assessment for Equality and Socio-Economic duty that must also be completed for policy proposals.

Remember that effects that are positive for some groups could be detrimental to others - even among Welsh language groups. Consider the effects on different groups. For example, a proposal may be beneficial to Welsh learners, but not to Welsh speakers.

### **Will the proposed action affect any or all of the following?**

	<b>Does the proposal have any positive, negative or neutral impacts?</b>	<b>Describe why it will have a positive/negative or neutral impact on the Welsh language.</b>	<b>What evidence do you have to support this view?</b>	<b>What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?</b>
<b>Opportunities for persons to use the Welsh language</b>  e.g. staff, residents and visitors  The rights of Welsh speakers and learners to use Welsh when dealing with the council	<b>Positive</b>  +	1. The Council has opportunities for internal staff across all services to access free training to improve their Welsh language skills. The Council's Welsh Language Services	1. All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to	1. All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to

and for staff to use Welsh at Work	<b>Neutral</b>	<p>Team are working to develop technological support for Welsh speakers and learners within the Council to be able to deliver services through the medium of Welsh.</p> <p>2. The Council will continue to adhere to The Welsh Language (Wales) Measure 2011, which requires the Council to produce a five year strategy to facilitate and promote the Welsh language. The second five year strategy, for the years between 2022 to 2027, was approved in 2022 and outlines several key policy areas to maintain and increase the number of Welsh speakers during its lifecycle. In developing this proposal, the RCT – Welsh Language Promotion Strategy and associated</p>	<p>further their skills by undertaking levels 2 and 3.</p> <p>2. The Annual Population Survey collects information about respondents' Welsh speaking ability and includes a question on respondent's Welsh language skills level. The most recent Annual Population Survey, for the quarter ending June 2022, reported that 24.1% of respondents living in RCT said they could speak Welsh, compared to the all Wales percentage of 33.4% of respondents.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN</p>	<p>further their skills by undertaking levels 2 and 3.</p> <p>2. Ensure that parents/carers, and the wider community are signposted to Welsh medium learning classes for adults and/or other opportunities for community engagement through the medium of Welsh via the Council's website and corporate social media platforms.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN classes will remain unchanged.</p>
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		<p>documents have been taken into consideration to encourage and facilitate long term growth in Welsh medium and Welsh language education and the Council has and will continue to ensure there is a clear alignment with it.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN classes will remain unchanged.</p>	<p>classes will remain unchanged.</p>	
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## **Stage 2 – Impact Assessment**

**Will the proposed action affect any or all of the following?**

	<b>Does the proposal have any positive, negative or neutral impacts?</b>	<b>Describe why it will have a positive/negative or neutral impact on the Welsh language.</b>	<b>What evidence do you have to support this view?</b>	<b>What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?</b>

<p><b>Numbers and / or percentages of Welsh speakers</b></p> <p>e.g Welsh Medium Education / Study Opportunities. Links with the Welsh Government's <a href="#">Cymraeg 2050 Strategy</a> / <a href="#">RCTCBC Five Year Welsh Language Strategy</a></p>	<p><b>Positive</b></p>	<p>The Council has opportunities for internal staff across all services to access free training to improve their Welsh language skills. The Council's Welsh Language Services Team are working to develop technological support for Welsh speakers and learners within the Council to be able to deliver services through the medium of Welsh.</p>	<p>All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to further their skills by undertaking levels 2 and 3.</p>	<p>All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to further their skills by undertaking levels 2 and 3.</p>
<p><b>Opportunities to promote the Welsh language</b></p> <p>e.g. status, use of Welsh language services, use of Welsh in everyday life in work and in the community</p> <p>Actively encourage and promote the use of our services in Welsh to see an increase in demand over time</p>	<p><b>Positive</b></p> <p>+</p> <p><b>Neutral</b></p>	<ol style="list-style-type: none"> <li>1. The Council has opportunities for internal staff across all services to access free training to improve their Welsh language skills. The Council's Welsh Language Services Team are working to develop technological support for Welsh speakers and learners within the Council to be able to deliver services through the medium of Welsh.</li> <li>2. The Council will continue to adhere to</li> </ol>	<ol style="list-style-type: none"> <li>1. All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to further their skills by undertaking levels 2 and 3.</li> <li>2. The Annual Population Survey collects information about respondents' Welsh speaking ability and includes a question on respondent's Welsh</li> </ol>	<ol style="list-style-type: none"> <li>1. All newly recruited Council staff are required to undertake Welsh language Level 1 training and those staff who obtain Level 1 will be encouraged to further their skills by undertaking levels 2 and 3.</li> <li>2. Ensure that parents/carers, and the wider community are</li> </ol>

		<p>The Welsh Language (Wales) Measure 2011, which requires the Council to produce a five year strategy to facilitate and promote the Welsh language. The second five year strategy, for the years between 2022 to 2027, was approved in 2022 and outlines several key policy areas to maintain and increase the number of Welsh speakers during its lifecycle. In developing this proposal, the RCT – Welsh Language Promotion Strategy and associated documents have been taken into consideration to encourage and facilitate long term growth in Welsh medium and Welsh language education and the Council has and will continue to</p>	<p>language skills level. The most recent Annual Population Survey, for the quarter ending June 2022, reported that 24.1% of respondents living in RCT said they could speak Welsh, compared to the all Wales percentage of 33.4% of respondents.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN classes will remain unchanged.</p>	<p>signposted to Welsh medium learning classes for adults and/or other opportunities for community engagement through the medium of Welsh via the Council's website and corporate social media platforms.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN classes will remain unchanged.</p>
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		<p>ensure there is a clear alignment with it.</p> <p>3. With the proposed enhancement of LSCs, Welsh medium ALN classes will remain unchanged.</p>		
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## **Stage 2 – Impact Assessment**

**Will the proposed action affect any or all of the following?**

	<b>Does the proposal have any positive, negative or neutral impacts?</b>	<b>Describe why it will have a positive/negative or neutral impact on the Welsh language.</b>	<b>What evidence do you have to support this view?</b>	<b>What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?</b>
<b>Compliance with the <a href="#">Council's Statutory Welsh Language Standards</a></b> e.g	<b>Positive</b>	All relevant and required statutory consultation associated with this proposal will be in accordance with the Council's Statutory Welsh	The relevant and required statutory consultation will be undertaken bilingually and all public correspondence in relation	The relevant and required statutory consultation will be undertaken bilingually and all public

<p>increasing or reducing the Council's ability to deliver services through the Medium of Welsh.</p> <p>Consider the rights of Welsh speakers to use Welsh when dealing with the Council and for staff to use Welsh at Work</p>		<p>Language Standards. This includes the consultation proforma where stakeholders are invited to provide their feedback to the proposed changes will be hosted online bilingually.</p>	<p>to the proposal will be produced bilingually.</p> <p>During the 2023 LSC realignment consultation process, some responses to the consultation proforma were received bilingually.</p>	<p>correspondence in relation to the proposal will be produced bilingually.</p> <p>The consultation proforma where stakeholders are invited to provide their feedback to the proposed changes will be hosted online bilingually.</p> <p>Prior to consultation events, schools will be consulted with as to whether the events should be completed bilingually.</p>
<p><b>Treating the Welsh language, no less favourably than the English language</b></p>	<p><b>Positive</b></p>	<p>All relevant and required statutory consultation associated with this proposal will be in accordance with the Council's Statutory Welsh Language Standards. This includes the consultation proforma where stakeholders are invited to provide their feedback to the proposed changes will be hosted online bilingually.</p>	<p>The relevant and required statutory consultation will be undertaken bilingually and all public correspondence in relation to the proposal will be produced bilingually.</p> <p>During the 2023 LSC realignment consultation process, some responses to the consultation</p>	<p>The relevant and required statutory consultation will be undertaken bilingually and all public correspondence in relation to the proposal will be produced bilingually.</p> <p>The consultation proforma where stakeholders are invited</p>

			proforma were received bilingually.	to provide their feedback to the proposed changes will be hosted online bilingually.  Prior to consultation events, schools will be consulted with as to whether the events should be completed bilingually.
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### **Stage 3 - Strengthening the proposal**

Having listed actions in section 2 which may mitigate any negative impacts or better contribute to positive impacts – please record below which ones you will imbed into the policy proposal and who will be responsible for them.

Also consider is the proposal necessary? Would it be possible to meet demand without any new developments? Could other existing provision be used? Where should the development be?

<b>What are you going to do?</b>	<b>When are you going to do it?</b>	<b>Who is responsible?</b>
Consultation and engagement with stakeholders (as set out in statutory Consultation Document).	The consultation will start on 30 <sup>rd</sup> September 2024 and will be completed at 5pm on 15 <sup>th</sup> November 2024. The feedback from the consultation will be collated and summarised, and a report presented to the Council's Cabinet in December 2024.	Access & Inclusion Service
Learners at hosting schools	The Council has acknowledged that the voice of children and young people is about involving them as active participants in the development, delivery, management and improvement of their educational and learner experience.	Access & Inclusion Service

	Children and young people have a right to express their views in all matters affecting them and for their views to be heard and given due consideration in accordance with their age and maturity. As such, the Council's Access & Inclusion Service will ensure that suitable arrangements are made to involve learners as active participants throughout this consultation process, and if a decision is made to progress the proposal, throughout the implementation process.	
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#### **Stage 4 – Review**

As part of the Welsh Language, Equalities and Socio Economic Duty Impact Assessment Process all proposals that fall within the definition of Significant Key Decision should present at the Officer Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your report is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Strategic Decision please forward your impact assessment to [CouncilBusiness@rctcbc.gov.uk](mailto:CouncilBusiness@rctcbc.gov.uk) for an Officer Review Panel to be organised to discuss your proposal. [See our guidance document](#) for more information on what a Significant Key Decision is.

For all policy proposals, whether it is a Significant Key Decision or not you are required to forward this assessment to Welsh Language services in the first instance for some initial guidance and feedback.

It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable Welsh language considerations wherever possible. Please ensure you update the relevant sections below

<b>Welsh Language Services Comments</b>	<b>Date Considered</b>	<b>Brief description of any amendments made following Welsh Language Services feedback</b>
<b>Officer Review Panel Comments</b>	<b>Date Considered</b>	<b>Brief description of any amendments made following Officer Review Panel considerations</b>

Consultation Comments	Date Considered	Brief description of any amendments made following consultation

### **Stage 5 – Monitoring, Evaluating and Reviewing**

How and who will you monitor the impact and effectiveness of the proposal?

Officers from the Access & Inclusion Service will monitor the proposal throughout the consultation and implementation period.

The Access & Inclusion Service will undertake a 'Lessons Learnt' review at the end of the implementation phase and this will feed into future projects so that each project improves and benefits from lessons learnt (positive and negative) during previous projects.

### **Stage 6 – Summary of Impacts for the Proposal**

Provide below a summary of the impact assessment. This summary should be included in the Welsh Language Considerations section of the SLT/Cabinet report template. The impact assessment should be published alongside the report.

In summary, the Welsh Language Impact Assessment identifies only positive or neutral impacts upon the Welsh Language.

- With the proposed enhancements of LSCs, the Welsh medium ALN learning will remain unchanged. Currently RCT hosts 2 Primary Phase Welsh medium LSCs in YGG Awel Taf with a total capacity of 18 pupils with significant presenting needs. RCT also hosts a Key Stage 3/4 Welsh medium LSC in Ysgol Garth Olwg with a capacity of 14 pupils with significant presenting needs.

- Whilst the proposed enhancements will have a neutral impact on Welsh language opportunities for the wider public, it is recognised that all staff employed for proposed LSCs will access training to meet the RCT Welsh Language Level 1 requirement. LSC staff also will be encouraged to further their skills by undertaking levels 2 and 3.
- All relevant and required statutory consultation associated with this proposal will be in accordance with the Council's Statutory Welsh Language Standards
- The proposals also have a positive impact for pupils attending English medium provision due to the proposed increase in Early Years, CLD and Social Communication Needs/ASD placements.

#### **Stage 7 – Sign Off**

<b>Name of Officer completing the WLIA</b>	Lisa Carter	<b>Service Director Name:</b>	Gaynor Davies
<b>Position</b>	Inclusion Co-ordinator	<b>I recommend that the proposal: (Highlight decision)</b>	<b>Is implemented with no amendments</b>
			<b>Is implemented taking into account the mitigating actions outlined</b>
			<b>Is rejected due to disproportionate negative impacts on the Welsh language</b>
<b>Signature</b>		<b>Service Director Signature</b>	
<b>Date</b>		<b>Date</b>	

## EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The [‘A More Equal Wales – Mapping Duties’](#) guide highlights the alignment of our duties in respect of the above-mentioned legislation.

## SECTION 1 – PROPOSAL DETAILS

Lead Officer: Lisa Carter

Director: Gaynor Davies

Service Area: Education and Inclusion Services, Access & Inclusion

Date: 04/09/2024

1.a) What are you assessing for impact?

Strategy/Plan	Service Re-Model/Discontinuation of Service	Policy/Procedure	Practice	Information/Position Statement
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1.b) What is the name of the proposal?

### **CONSULTATION ON THE PROPOSALS TO ENHANCE ADDITIONAL LEARNING NEEDS MAINSTREAM LEARNING SUPPORT CLASS PROVISION WITHIN RHONDDA CYNON TAF**

1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.



Following the enactment of the ALNET Act (2018) and the implementation of the associated statutory ALN Code (2021) in September 2021, local authorities (LAs) in Wales are currently implementing year 4 of a phased national ALN Implementation Plan to move from the outgoing SEN system to the new ALN system. The overarching aim of the ALN Code is: *'To support the creation of a fully inclusive system where all children and young people are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning'* (ALN Code 2021, Section 3:1).

The new ALN legislative framework ensures that all children and young people from age 0–25 with an identified ALN will have a statutory Individual Development Plan (IDP) which sets out the ALP they will receive to address their identified ALN. The legislation also places a statutory duty upon LAs to keep under review the sufficiency of their provision for learners with ALN and to address any identified gaps or areas for improvement.

RCT has an excellent range of LSC provisions attached to mainstream schools, however, it has become increasingly apparent that the range of LSC provisions currently available is disproportionate to the level of need in some areas. In view of this, an in-depth data analysis exercise was undertaken to inform proposals for change.

Data analysis confirms that:

- there is currently insufficient provision in the secondary phase;
- the absence of cross phase specialist provision on some school sites means that some learners experience unnecessary transitions;
- there is insufficient provision to meet the needs of learners in the early years.

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

- developing a robust continuum of provision that effectively addresses a wide range of need across all year groups;
- avoiding unnecessary transition across schools by establishing cross phase specialist provisions within individual schools where possible;
- establishing LSC provisions in fully accessible settings that provide a learning environment fit for the 21<sup>st</sup> Century.

The proposals are as follows:

- To establish 1 Early Years' Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School. The proposal will take effect from September 2025.

- To establish 1 Early Years' Intervention LSC for pupils under statutory school age with significant presenting needs at Penyreglyn Primary School. The proposal will take effect from September 2025.
- To establish 1 LSC for pupils in years 7-11 with Complex Learning Needs at Mountain Ash Comprehensive School taking effect from September 2025.
- To relocate the LSC for pupils years 3-6 with Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School taking effect from September 2025.
- To establish 1 LSC for pupils in reception–year 2 with Social Communication Needs/ASD at Hirwaun Primary School to create a through provision in the Primary Phase taking effect from September 2025.

Please refer to the Cabinet reported presented on 19<sup>th</sup> September 2024

1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

Section 315 of the Education Act 1996

Additional Learning Needs and Education Tribunal Act Wales (2018)

1.e) Please outline who this proposal affects:

- |                   |                                     |
|-------------------|-------------------------------------|
| ○ Service users   | <input checked="" type="checkbox"/> |
| ○ Employees       | <input checked="" type="checkbox"/> |
| ○ Wider community | <input checked="" type="checkbox"/> |

## **SECTION 2 – SCREENING TEST – IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?**

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

### **Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<p><b>Age</b> (<i>Specific age groups i.e. young people or older people</i>)</p> <p>Reception – Yr2 (formerly Foundation Phase) Yr 3 – 6 (formerly Key Stage 2) Yr 7 – 11 (formerly Key Stage 3&amp;4)</p>	Positive	<ul style="list-style-type: none"> <li>• Appropriate placements which are well matched to pupils' primary needs.</li> <li>• Improved educational outcomes and pupil engagement due to meeting identified pupil needs more effectively.</li> <li>• Greater opportunities for mainstream inclusion in local community schools</li> <li>• Improved continuum of learning provision which improves life chances for our most vulnerable learners.</li> <li>• Proposed additional classes will enhance LSC capacity across all age ranges including Early Years provision capacity.</li> </ul>	<p>During the 2023/24 academic year, 611 cases have been discussed at Early Years Forum of which 163 were new cases 348 were re-referred to Forum following receipt of updated information. Following Advisory Panel, 53 pupils are now in receipt of a LA maintained IDP. 180 pupils have been offered support from the Transition Team this academic year with a further 90 pupils already on the caseload receiving support for their transition in September 2023</p> <p>Through data analysis, it is estimated that in 2025/26, 9 pupils will require Secondary Complex LSC provision however there are only 5 places available therefore a shortfall of 4 places.</p>

			<p>There is currently no LSC for Secondary Phase pupils with Complex Learning Difficulties in the Cynon Valley, meaning that pupils require support to access specialist provision at Tonyrefail, Ferndale or Treorchy Comprehensive Schools. Establishing the proposed provision will ensure Cynon Valley pupils are able to access local mainstream LSC provision.</p>
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<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b>Disability</b> <i>(people with visible and non-visible disabilities or long-term health conditions)</i>	<p>Positive</p> <p>+</p> <p>Negative</p>	<p>The review of LSC provision will allow the LA to better meet the needs of its ALN pupils. The proposed mainstream schools hosting the LSC will be fully compliant with all disability legislation. The increase of classes will enable more students to access fully accessible LSC provision while reducing unnecessary transition</p> <p>LSC re-alignment will inevitably cause some disruption and uncertainty for parents and pupils for a period of time, although experience shows that this can be kept to a minimum and the children's education and wellbeing does not suffer. Access &amp; Inclusion will provide support to eradicate or minimise any potential negative impact.</p>	<p>Delivery of new LSC provision enhances the educational opportunities for pupils with significant additional learning needs and will provide the required additional LSC provision.</p>
<b>Gender Reassignment</b> <i>(anybody who's gender identity or gender expression is different to the sex they</i>	<p>Neutral</p>	<p>This proposal is not expected to have a direct impact on characteristics relating to Gender Reassignment. The</p>	<p>There is no evidence to suggest that the proposal will have an impact on people that share this characteristic</p>

<p><i>were assigned at birth including non-binary identities).</i></p>		<p>implementation of this proposal will be monitored routinely. Should an impact arise relating to Gender Reassignment, this impact assessment will be updated to reflect this.</p>	
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<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b>Marriage or Civil Partnership</b> <i>(people who are married or in a civil partnership)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to Marriage or Civil Partnership. The implementation of this proposal will be monitored routinely. Should an impact arise relating to Marriage or Civil Partnership, this impact assessment will be updated to reflect this.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic
<b>Pregnancy and Maternity</b> <i>(women who are pregnant/on maternity leave)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to Pregnancy or Maternity. The implementation of this proposal will be monitored routinely. Should an impact arise relating to Pregnancy or Maternity, this impact assessment will be updated to reflect this.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic
<b>Race</b> <i>(ethnic and racial groups i.e. minority ethnic groups, Gypsy, Roma and Travellers)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to Race. The implementation of this proposal will be monitored	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic



		<p>routinely. Should an impact arise relating to Race, this impact assessment will be updated to reflect this.</p>	
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<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b>Religion or Belief</b> <i>(people with different religions and philosophical beliefs including people with no beliefs)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to Religion or Belief. The implementation of this proposal will be monitored routinely. Should an impact arise relating to Religion or Belief, this impact assessment will be updated to reflect this.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic
<b>Sex</b> <i>(women and men, girls and boys)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to Sex. The implementation of this proposal will be monitored routinely. Should an impact arise relating to Religion or Belief, this impact assessment will be updated to reflect this.	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic
<b>Sexual Orientation</b> <i>(bisexual, gay, lesbian, straight)</i>	Neutral	This proposal is not expected to have a direct impact on characteristics relating to sexual orientation. The implementation of this proposal will be monitored routinely. Should an impact arise relating	There is no evidence to suggest that the proposal will have an impact on people that share this characteristic

		to sexual orientation, this impact assessment will be updated to reflect this.	
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In addition, due to Council commitments made to the following groups of people we would like you to consider impacts upon them:

	Does the proposal have any positive, negative or neutral impacts	Provide detail of the impact	What evidence has been used to support this view?
<b>Armed Forces Community</b> <i>(anyone who is serving, has served, family members and the bereaved)</i>	Positive	The increase in LSC provision will provide greater opportunity for pupils with significant ALN to access specialist provision across all age groups.	Increased numbers of LSC places will result in the ability to accommodate more children with significant ALN across all age groups.
<b>Carers</b> <i>(anyone of any age who provides unpaid care)</i>	Positive	Increased potential to access appropriate specialist provision.	The establishment of more LSC provision will result in the ability to support more children with significant ALN.

If the initial screening test has identified negative impacts then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant please provide an adequate explanation below:

No negative impacts have been identified for protected groups. All impacts on protected groups will be either neutral or positive.

Are you happy you have sufficient evidence to justify your decision?

Yes ☒

No ☐

Name: Lisa Carter

Position: Inclusion Co-ordinator

Date: 04/09/2024

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

PLEASE NOTE – there is a separate impact assessment for Welsh Language. This must also be completed for proposals. Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a ‘strategic nature’ is available on page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

### SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

<ul style="list-style-type: none"><li>• Single parents and vulnerable families</li><li>• Pensioners</li><li>• Looked after children</li><li>• Homeless people</li><li>• Students</li><li>• Single adult households</li></ul>	<ul style="list-style-type: none"><li>• People living in the most deprived areas in Wales</li><li>• People with low literacy and numeracy</li><li>• People who have experienced the asylum system</li><li>• People misusing substances</li><li>• People of all ages leaving a care setting</li><li>• People involved in the criminal justice system</li></ul>
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<b><u>Socio-economic disadvantage</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b>Low Income/<u>Income Poverty</u></b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Neutral	<p>The advantages of implementing the proposed change includes:</p> <ul style="list-style-type: none"> <li>• an enhanced focus on improved mainstream LSC provision which provides improved life chances for our most vulnerable learners</li> <li>• appropriate continuum of provision which is well matched to pupils' primary needs</li> <li>• improved educational outcomes and pupil engagement due to effectively meeting pupil needs</li> <li>• greater opportunities for mainstream inclusion in a local community school</li> </ul> <p>A disadvantage could potentially include additional travel for some pupils. However, transport 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 a LSC pupils may be required to travel out of catchment although Access &amp; Inclusion will endeavour to place pupils in</p>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in the capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>

		the nearest appropriate LSC to their home address.	
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<b><u>Socio-economic disadvantage</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b>Low and / or No Wealth</b> <i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i>	Neutral	<p>The advantages of implementing the proposed change includes:</p> <ul style="list-style-type: none"> <li>• ensuring that LSC provision is situated within an education setting that is accessible and appropriate for pupils with wide ranging needs, including physical and medical needs</li> <li>• improving the range and quality of facilities and learning resources available to the benefit of all pupils</li> <li>• the new LSC provisions will be hosted by schools that has the capacity for the development of an additional class due to surplus spaces and can accommodate the additional pupils who will be placed in the school.</li> </ul> <p>A disadvantage could potentially include additional travel for some pupils. However, transport would be provided in line with the Council's Learner Travel Policy and placement</p>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>



		made in the nearest and most appropriate specialist setting. If placed within a LSC pupils may be required to travel out of catchment although Access & Inclusion will endeavour to place pupils in the nearest appropriate LSC to their home address.	
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<b><u>Socio-economic disadvantage</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b><u>Material Deprivation</u></b> <i>(unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)</i>	Positive	<p>The advantages of implementing the proposed change includes:</p> <ul style="list-style-type: none"> <li>• an enhanced focus on improved mainstream LSC provision which provides improved life chances for our most vulnerable learners</li> <li>• appropriate continuum of provision which is well matched to pupils' primary needs</li> <li>• compliance with one of the underpinning principles of the ALNET Act that all pupils should access mainstream education where possible</li> <li>• improved educational outcomes and pupil engagement through effectively meeting pupils' needs</li> <li>• greater opportunities for mainstream inclusion in a local community school</li> <li>• ensuring that LSC provisions are situated within education settings that are accessible and appropriate for pupils with wide ranging needs, including physical and medical needs</li> </ul>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>

		<ul style="list-style-type: none"> <li>• improving the range and quality of facilities and learning resources available for the benefit of all pupils</li> <li>• the new LSC provision will be hosted by schools that has the capacity for the development of an additional class due to surplus spaces and can accommodate the additional pupils who will be placed in the school.</li> </ul>	
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<b><u>Socio-economic disadvantage</u></b>	<b>Does the proposal have any positive, negative or neutral impacts</b>	<b>Provide detail of the impact</b>	<b>What evidence has been used to support this view?</b>
<b><u>Area Deprivation</u></b> <i>(where you live (rural areas), where you work (accessibility of public transport))</i>	Positive	<p>The LSC's will be hosted in an accessible location to allow pupils across the LA access to the specialist provision. Transport to the provision will be provided in line with RCT Learner Travel policy so no pupils will be adversely impacted by distance. The increase in LSCs will provide additional opportunities for pupils with significant ALN to access local LSC provision.</p> <p>If placed within a LSC, pupils may be required to travel out of catchment although Access &amp; Inclusion will endeavour to place pupils in the nearest appropriate LSC to their home address.</p>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in the capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>

<p><b>Socio-economic background</b>  <i>(social class i.e. parents education, employment and income)</i></p>	<p>Positive</p>	<p>Improving specialist provision for pupils in RCT has been at the heart of the decision-making process in relation to the proposal.</p> <p>All decisions have been made with a full understanding of the needs of the pupils and with the aim of providing high quality, fully accessible 21<sup>st</sup> Century specialist provision for pupils who require specialist provision in a LSC within a fully inclusive mainstream setting.</p>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in the capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>
<p><b>Socio-economic disadvantage</b>  <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>Positive</p>	<p>The new LSCs will positively impact pupils with significant additional learning needs and their parents/carers.</p> <p>The proposed changes to the current and establishment of new LSC provisions provides pupils with significant learning needs the opportunity for pupils to attend LSC provision in mainstream schools.</p> <p>There is no negative impact to any individual who may be financially or materially disadvantaged, as the</p>	<ul style="list-style-type: none"> <li>• Previous establishment of new LSC provision throughout the county borough</li> <li>• Increase in the capacity of the LA to support pupils with varying additional learning needs</li> <li>• Positive impact of establishing the LSCs on the school and wider communities.</li> </ul>

	Negative	<p>new provisions will provide additional opportunities for children to access Complex Learning Difficulties, Early Years and Autistic Spectrum Disorder specialist provision.</p> <p>For those pupils attending provision that will be relocating there will be some short-term disruption that may incur a level of anxiety to both parents and pupils. However, those affected will be supported by Access &amp; Inclusion during the transition phase. Those staff working in a LSC that is proposed to be relocated will move with the LSC pupils to ensure their expertise is maintained and that the pupils have continuity of staff supporting them.</p>	
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## SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. **Attach a separate action plan where impacts are substantial.**

No substantial negative impacts have been identified in this equality impact assessment. However, a potential negative impact has been identified in relation to the short-term disruption of pupils attending the LSCs proposed to relocate. To mitigate this potential impact, staff working in a LSC that is proposed to be relocated will move with the LSC pupils to ensure their expertise is maintained and that the pupils have continuity of staff supporting them.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

The potential negative impact has been mitigated as detailed above. Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/staff.

- 4.c) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.

There is a detailed cabinet report and consultation document that has been written to support the proposed realignment of LSC provision, both reports clearly identify the need for additional LSC provision and the data rationale behind the proposal. The consultation runs until 15<sup>th</sup> November 2024 following which a consultation report will be shared with cabinet and all relevant stakeholders.

- 4.d) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?

Yes ☒

Nd ☐

## SECTION 5 – MONITORING AND REVIEW

5a) Please outline below how the implementation of the proposal will be monitored:

The Council's Access & Inclusion Service will be fully engaged in supporting the head teacher and governing body to establish the LSC provision through its well-established line management and quality assurance processes relating to its management of LSC provisions. In line with the requirements of the Additional Learning Needs and Education Tribunal Act (ALNET) 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 ALN in RCT.

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

Director of Education and Inclusion Services

Rhondda Cynon Taf County Borough Council

Valleys Innovation Centre

Abercynon

CF45 4SN

or e-mail [AandIService@rctcbc.gov.uk](mailto:AandIService@rctcbc.gov.uk)



5b) When is the evaluation of the proposal due to be reviewed?

Reports will be presented to Cabinet at regular intervals as the proposal progresses

5c) Who is responsible for the monitoring and review of the proposal?

Officers from the Access & Inclusion Service will monitor the proposal throughout the consultation and implementation period.

5d) How will the results of the monitoring be used to develop future proposals?

The Access & Inclusion Service will undertake a 'Lessons Learnt' review at the end of the implementation phase and this will feed into future projects so that each project improves and benefits from lessons learnt (positive and negative) during previous projects.

## SECTION 6 – REVIEW

As part of the Impact Assessment process all proposals that fall within the definition of ‘Key Decisions’ must be submitted to the Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your proposal is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Decision please forward your impact assessment to [Councilbusiness@rctcbc.gov.uk](mailto:Councilbusiness@rctcbc.gov.uk) for a Review Panel to be organised to discuss your proposal. The EqIA guidance document provides more information on what a Key Decision is.

It is important to keep a record of this process so that you can demonstrate how you have considered equality and socio-economic outcomes. Please ensure you update the relevant sections below

Officer Review Panel Comments	Date Considered	Brief description of any amendments made following Officer Review Panel considerations
		-
Consultation Comments	Date Considered	Brief description of any amendments made following consultation

## **SECTION 6 – SUMMARY OF IMPACTS FOR THE PROPOSAL**

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

In summary, the Equality Impact Assessment identifies positive and neutral impacts, and no negative impacts upon the protected characteristics.

- The impact on age is extremely positive as they will have the full benefit of being educated in specialist LSC provision based in fantastic facilities fit for the 21st Century. Providing an inclusive model of specialist provision hosted by a mainstream school that can meet their identified needs within their local community
- The buildings will be fully compliant with the Equality Act 2010 thereby ensuring that no pupil, staff member, parent/carer or member of the wider community is prevented from fully accessing the whole extent of the new facilities.
- There is an expectation that pupils in all LSCs will have mainstream inclusion opportunities. The LSCs are integral to the ethos of the host schools and families and pupils are treated equitably alongside mainstream peers. The realignment of LSCs and establishment of the proposed LSCs will ensure the LA has provided suitable provision to support children with ALN of all academic year groups.

## SECTION 7 – AUTHORISATIONS

Lead Officer:

Name: Lisa Carter

Position: Inclusion Co-ordinator

Date: 04/09/2024

I recommend that the proposal:

- Is implemented with no amendments ☒
- Is implemented taking into account the mitigating actions outlined ☐
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage ☐

Head of Service/Director Approval:

Name: Gaynor Davies

Position: Director of Education and Inclusion Services

Date: 04/09/2024

## **Community Impact Assessment**

This Community Impact Assessment is prepared in accordance with the School Organisation Code – 2018 (011/2018). It is to be read alongside the Consultation Document, the Welsh Language Impact Assessment and the Equality Impact Assessment as the information in all documents is related and the themes within them are cross-cutting.

Section 2.3 of the School Organisation Code – 2018 refers to regulated alterations to a school which includes:

- The introduction or removal of SEN/ALN provision or any change in the type of such provision. This is where the provision is in a mainstream school but the pupils who are admitted are in addition to admission number of the school. The provision must also be recognised by the local authority as reserved for pupils with SEN/ALN;

The proposals include:

- To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School. The proposal will take effect from September 2025.
- To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyrenglyn Primary School. The proposal will take effect from September 2025.
- To establish one LSC for pupils in Years 7-11 with Complex Learning Needs at Mountain Ash Comprehensive School taking effect from September 2025.
- To relocate the LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School taking effect from September 2025.
- To establish one LSC for pupils in Reception – Year 2 with Autistic Spectrum Disorder at Hirwaun Primary School to create a through provision in the Primary Phase taking effect from September 2025.

The proposals are to be consulted on between 30<sup>th</sup> September 2024 and 15<sup>th</sup> November 2024. A detailed Consultation Document has been circulated to all prescribed stakeholders and the Community Impact Assessment is an appendix of this main document. Copies will be forwarded to the Welsh Government in compliance with consultation and publication guidelines.

## **Proposal:**

- 1. To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Cwmaman Primary School. The proposal will take effect from September 2025.**

RCT is proposing to enhance the Early Years Intervention provision within the County Borough by creating an additional LSC to support pre-statutory school age pupils with significant presenting needs. The class will support 8 pre-statutory school aged pupils.

- 2. To establish one Early Years Intervention LSC for pupils under statutory school age with significant presenting needs at Penyreglyn Primary School. The proposal will take effect from September 2025.**

RCT is proposing to enhance the Early Years Intervention provision within the County Borough by creating an additional LSC to support pre-statutory school age pupils with significant presenting needs. The class will support 8 pre-statutory school aged pupils.

- 3. To establish one LSC for pupils in Years 7-11 with Complex Learning Needs at Mountain Ash Comprehensive School taking effect from September 2025.**

To address the current capacity issues, it is proposed RCT opens an additional LSC for pupils in Years 7-11 with CLD at Mountain Ash Comprehensive School. This is to ensure the LA meets the demands for specialist CLD provision in its secondary phase. The class will support 14 pupils Yr 7-11.

- 4. To relocate the LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Penywaun Primary School to Hirwaun Primary School taking effect from September 2025.**

RCT is proposing to relocate its ASD class from Penywaun to Hirwaun. This will minimise unnecessary transition for pupils with ASD, provide continuity in their educational placements and ensure that a higher number of specialist LSC provisions provide equity for pupils in LSCs so that they remain in one setting until transition to secondary provision in line with their mainstream peers. The provision will continue to accommodate 10 pupils Yrs 3-6.

**5. To establish one LSC for pupils in Reception – Year 2 with Autistic Spectrum Disorder at Hirwaun Primary School to create a through provision in the Primary Phase taking effect from September 2025**

The proposal to establish a Reception – Year 2 ASD provision in Hirwaun will enhance the ASD provision within the County Borough by creating an additional LSC to meet the demand for specialist ASD provision. Linking with proposal 4 above the proposed class relocation, this proposed new provision will increase capacity whilst also reducing transition. The provision will accommodate 8 pupils Reception – Yr2.

All placements within the LSC will be agreed in the Access and Inclusion ALN panels.

### **Community Impact**

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

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

### **Impact on Health and Wellbeing**

It is anticipated that the proposals will have a significantly positive impact on the health and wellbeing of pupils targeted by the proposals. The relocation of classes will allow pupils to access buildings that have benefited from the modernisation programme and the creation of additional Early Years, CLD and ASD provisions will meet the rising demand for specialist provision in these specific areas of need in RCT.

### **Current 'Out of hours' Usage**

Any services currently provided by the schools to parents, pupils and the communities will remain unaltered for example; breakfast and afterschool clubs.

### **Transport and Travel Implications**

Transportation would be provided in line with the Council's Learner Travel Policy. If placed within the LSC pupils may be required to travel out of catchment.