

## 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 Penyrenglyn 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
- Employees
- Wider community

## **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 – Yr 2 (formerly Foundation Phase)  Yr 3 – 6 (formerly Key Stage 2)  Yr 7 – 11 (formerly Key Stage 3&amp;4)</p>	<p>Positive</p>	<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</p>

			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.
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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>
<p><b>Disability</b> <i>(people with visible and non-visible disabilities or long-term health conditions)</i></p>	<p>Positive</p> <p style="text-align: center;">+</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>Data analysis shows that 5 pupils will be transitioning alongside the class if the proposal is accepted. 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</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. With the additional classes being established, the number of placements available for pupils with significant additional learning needs (excluding special school placements) will increase from 474 to 512 (approximately an 8% increase).</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>



		<p>specialist members of staff from Access and Inclusion.</p> <p>Access and Inclusion has a proven track record of successfully supporting pupils through the relocation of Learning Support Classes. Past relocations have demonstrated that pupils can adapt quickly due to the collaborative efforts of the Local Authority, families and school staff creating a smooth transition and promoting positive outcomes.</p>	
<p><b>Gender Reassignment</b> <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities).</i></p>	Neutral	<p>This proposal is not expected to have a direct impact on characteristics relating to Gender Reassignment. The 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>	<p>There is no evidence to suggest that the proposal will have an impact on people that share this characteristic</p>

<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 routinely. Should an impact arise relating to Race, 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.  Cwmaman Primary School <ul style="list-style-type: none"> <li>• 97.1% of statutory school age pupils identified as White</li> </ul>

			<p>British WBRI.</p> <ul style="list-style-type: none"><li>• 2.9% of statutory school age pupils identified as any other ethnic background.</li><li>• 0% of statutory school age pupils identified as unknown.</li></ul> <p>Hirwaun Primary School</p> <ul style="list-style-type: none"><li>• 96.0% of statutory school age pupils identified as White British WBRI.</li><li>• 4.0% of statutory school age pupils identified as any other ethnic background.</li><li>• 0% of statutory school age pupils identified as unknown.</li></ul> <p>Mountain Ash Comprehensive School</p> <ul style="list-style-type: none"><li>• 94.8% of statutory school age pupils identified as White British WBRI.</li><li>• 5.2% of statutory school age pupils identified as any other ethnic background.</li><li>• 0% of statutory school age pupils identified as</li></ul>
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			<p>unknown.</p> <p>Penyreglyn Community Primary School</p> <ul style="list-style-type: none"><li>• 94.1% of statutory school age pupils identified as White British WBRI.</li><li>• 5.9% of statutory school age pupils identified as any other ethnic background.</li><li>• 0% of statutory school age pupils identified as unknown.</li></ul> <p>Penywaun Primary School</p> <ul style="list-style-type: none"><li>• 94.8% of statutory school age pupils identified as White British WBRI.</li><li>• 5.2% of statutory school age pupils identified as any other ethnic background.</li><li>• 0% of statutory school age pupils identified as unknown.</li></ul>
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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>	Positive  +  Negative	Creating additional LSC placements will expand opportunities for pupils regardless of gender to access specialist provision tailored to their individual needs. This increase in capacity ensures a more inclusive and equitable approach, enabling more pupils to benefit from specialist support and resources that promote their educational development and well-being.  The relocation will impact a total of five pupils, comprising of 4 boys and 1 girl. Access and Inclusion will work with the families of pupils directly affected by the proposals to put in place	PLASC 2024 data shows that: <ul style="list-style-type: none"> <li>• 45.9% of pupils attending Cwmaman Primary School are girls and 54.1% are boys.</li> <li>• 47.6% of pupils attending Hirwaun Primary School are girls and 52.4% are boys.</li> <li>• 52.2% of pupils attending Mountain Ash Comprehensive School are girls and 47.8% are boys.</li> <li>• 51.1% of pupils attending Penyreglyn Community Primary School are girls and 48.9% are boys.</li> </ul>

		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.	<ul style="list-style-type: none"> <li>41.4% of pupils attending Penywaun Primary School are girls and 58.6% are boys.</li> </ul>
<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 to sexual orientation, 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.

In addition, due to Council commitments made to the following groups of people we would like you to consider impacts upon them:

	<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>Armed Forces Community</b> <i>(anyone who is serving, has served, family members and the bereaved)</i>	Positive	<p>The increase in LSC provision will provide greater opportunity for pupils with significant ALN to access specialist provision across all age groups.</p> <p>The new LSCs will have the ability to accommodate more children who may move to the</p>	<p>Increased numbers of LSC places will result in the ability to accommodate more children with significant ALN across all age groups.</p> <p>Below are the total number of pupils in the Armed</p>

		<p>area midway through an academic year (due to a change in circumstances).</p> <p>In such circumstances children and families will be supported by a regional school Liaison Officer who works with children and families of the armed forces community.</p>	<p>Forces Community in each of the affected schools:</p> <p>Cwmaman Primary – 5</p> <p>Mountain Ash Comprehensive – 6</p> <p>Penyreglyn Primary – 4</p> <p>Currently there is no data available for Hirwaun Primary and Penywaun Primary. If this data becomes available, the impact assessment will be updated accordingly.</p>
<p><b>Carers</b> <i>(anyone of any age who provides unpaid care)</i></p>	<p>Positive</p>	<p>The new LSCs will have the ability to accommodate more children who may move to the area midway through an academic year (due to a change in circumstances).</p> <p>In such circumstances children and families will be supported by RCTCBC.</p>	<p>The establishment of more LSC provision will result in the ability to support more children with significant ALN.</p> <p>Below are the total number of young carers in each of the affected schools:</p> <p>Cwmaman Primary – 5</p> <p>Hirwaun - 0</p> <p>Mountain Ash Comprehensive – 6</p> <p>Penyreglyn Primary – 4</p> <p>Penywaun - 0</p>

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:

Nearly all impacts on protected groups are neutral or positive. Only 2 negative impacts have been identified to which Access & Inclusions have identified mitigating actions to eradicate or minimise any negative impact.

Are you happy you have sufficient evidence to justify your decision?                      Yes                       No                     

Name: Lisa Carter

Position: Inclusion Co-ordinator

Date: 04/09/2024 updated January 2025

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:

- Single parents and vulnerable families
- Pensioners
- Looked after children
- Homeless people
- Students
- Single adult households

- People living in the most deprived areas in Wales
- People with low literacy and numeracy
- People who have experienced the asylum system
- People misusing substances
- People of all ages leaving a care setting
- People involved in the criminal justice system

<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>
<p><b>Low Income/<a href="#">Income Poverty</a></b>  <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Neutral</p>	<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 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>The Welsh Index of Multiple Deprivation (WIMD) is the WG's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD ranks all small areas (Lower Super Output Areas (LSOA)) in Wales from 1 (most deprived) to 1,909 (least deprived).</p> <p>The WIMD is made up of eight separate domains of deprivation, each compiled from a range of different indicators. The WIMD is</p>

			<p>constructed from a weighted sum of the deprivation score for each domain. The weights reflect the importance of the domain as an aspect of deprivation, and the quality of the indicators available for that domain. The domains are:</p> <ul style="list-style-type: none"><li>• Income.</li><li>• Employment.</li><li>• Health.</li><li>• Education.</li><li>• Access to Services.</li><li>• Housing.</li><li>• Community Safety.</li><li>• Physical Environment.</li></ul> <p>In terms of the overall WIMD scoring the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"><li>• Cwmaman Primary School – 288/1909 (Wales), 40/154 (RCT)</li><li>• Hirwaun Primary School – 176/1909 (Wales), 25/154 (RCT)</li><li>• Mountain Ash Comprehensive School – 468/1909 (Wales), 75/154 (RCT)</li><li>• Penyrenglyn Primary School – 114/1909</li></ul>
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			<p>(Wales), 15/154 (RCT)</p> <ul style="list-style-type: none"><li>• Penywaun Primary School – 15/1909 (Wales), 3/154 (RCT)</li></ul> <p>In terms of the income domain, the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"><li>• Cwmaman Primary School – 211/1909 (Wales), 27/154 (RCT)</li><li>• Hirwaun Primary School – 141/1909 (Wales), 17/154 (RCT)</li><li>• Mountain Ash Comprehensive School – 598/1909 (Wales), 72/154 (RCT)</li><li>• Penyreglyn Primary School – 125/1909 (Wales), 14/154 (RCT)</li><li>• Penywaun Primary School – 26/1909 (Wales), 3/154 (RCT)</li></ul> <p>All schools directly impacted by the proposed changes are among the 50% most deprived LSOAs in RCT and among the 31% most deprived LSOAs in Wales.</p>
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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>
<p><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></p>	<p>Neutral</p>	<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 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</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>The Welsh Index of Multiple Deprivation (WIMD) is the WG's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD ranks all small areas (Lower Super Output Areas (LSOA)) in Wales from 1 (most deprived) to 1,909 (least deprived).</p> <p>The WIMD is made up of eight separate domains of deprivation, each compiled from a range of different indicators. The WIMD is constructed from a weighted sum</p>

		<p>place pupils in the nearest appropriate LSC to their home address.</p>	<p>of the deprivation score for each domain. The weights reflect the importance of the domain as an aspect of deprivation, and the quality of the indicators available for that domain. The domains are:</p> <ul style="list-style-type: none"> <li>• Income.</li> <li>• Employment.</li> <li>• Health.</li> <li>• Education.</li> <li>• Access to Services.</li> <li>• Housing.</li> <li>• Community Safety.</li> <li>• Physical Environment.</li> </ul> <p>In terms of the overall WIMD scoring the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"> <li>• Cwmaman Primary School – 288/1909 (Wales), 40/154 (RCT)</li> <li>• Hirwaun Primary School – 176/1909 (Wales), 25/154 (RCT)</li> <li>• Mountain Ash Comprehensive School – 468/1909 (Wales), 75/154 (RCT)</li> <li>• Penyrenglyn Primary School – 114/1909 (Wales), 15/154 (RCT)</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>
<p><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></p>	<p>Positive</p>	<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> <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</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> <p>The Welsh Index of Multiple Deprivation (WIMD) is the WG's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD ranks all small areas (Lower Super Output Areas (LSOA)) in Wales from 1 (most deprived) to 1,909 (least deprived).</p> <p>The WIMD is made up of eight separate domains of deprivation, each compiled from a range of different indicators. The WIMD is constructed from a weighted sum</p>



		<p>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.</p>	<p>of the deprivation score for each domain. The weights reflect the importance of the domain as an aspect of deprivation, and the quality of the indicators available for that domain. The domains are:</p> <ul style="list-style-type: none"> <li>• Income.</li> <li>• Employment.</li> <li>• Health.</li> <li>• Education.</li> <li>• Access to Services.</li> <li>• Housing.</li> <li>• Community Safety.</li> <li>• Physical Environment.</li> </ul> <p>In terms of the overall WIMD scoring the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"> <li>• Cwmaman Primary School – 288/1909 (Wales), 40/154 (RCT)</li> <li>• Hirwaun Primary School – 176/1909 (Wales), 25/154 (RCT)</li> <li>• Mountain Ash Comprehensive School – 468/1909 (Wales), 75/154 (RCT)</li> <li>• Penyrenglyn Primary School – 114/1909 (Wales), 15/154 (RCT)</li> </ul>
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			<ul style="list-style-type: none"><li>• Penywaun Primary School – 15/1909 (Wales), 3/154 (RCT)</li></ul> <p>In terms of the Access to Services indicator the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"><li>• Cwmaman Primary School – 652/1909 (Wales), 38/154 (RCT)</li><li>• Hirwaun Primary School – 1429/1909 (Wales), 103/154 (RCT)</li><li>• Mountain Ash Comprehensive School – 523/1909 (Wales), 23/154 (RCT)</li><li>• Penyreglyn Primary School – 521/1909 (Wales), 22/154 (RCT)</li><li>• Penywaun Primary School – 286/1909 (Wales), 4/154 (RCT)</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>
<p><b><u>Area Deprivation</u></b>  <i>(where you live (rural areas), where you work (accessibility of public transport))</i></p>	<p>Positive</p>	<p>The LSCs 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> <p>The proposed LSC developments will enhance provision in the Cynon area by creating a CLD secondary provision – currently, CLD secondary provision is only located within Rhondda.</p> <p>The proposed LSC developments will also enhance the Early Years provision within RCT as it is proposed that an Early Years LSC is established in Penynglyn</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> <p>The Welsh Index of Multiple Deprivation (WIMD) is the WG's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD ranks all small areas (Lower Super Output Areas (LSOA)) in Wales from 1 (most deprived) to 1,909 (least deprived).</p> <p>The WIMD is made up of eight separate domains of deprivation, each compiled from a range of different indicators. The WIMD is constructed from a weighted sum</p>

		<p>Primary (increasing specialist places within Rhondda) and an Early Years LSC to be established in Cwmaman Primary (increasing specialist provision within Cynon).</p> <p>Finally, the proposed LSC changes to Hirwaun primary will enhance ASD provision within the Cynon by creating a through school ASD provision reducing the number of times a pupil within this designation will need to transition.</p>	<p>of the deprivation score for each domain. The weights reflect the importance of the domain as an aspect of deprivation, and the quality of the indicators available for that domain. The domains are:</p> <ul style="list-style-type: none"> <li>• Income.</li> <li>• Employment.</li> <li>• Health.</li> <li>• Education.</li> <li>• Access to Services.</li> <li>• Housing.</li> <li>• Community Safety.</li> <li>• Physical Environment.</li> </ul> <p>In terms of the overall WIMD scoring the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"> <li>• Cwmaman Primary School – 288/1909 (Wales), 40/154 (RCT)</li> <li>• Hirwaun Primary School – 176/1909 (Wales), 25/154 (RCT)</li> <li>• Mountain Ash Comprehensive School – 468/1909 (Wales), 75/154 (RCT)</li> <li>• Penyrenglyn Primary School – 114/1909 (Wales), 15/154 (RCT)</li> </ul>
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			<ul style="list-style-type: none"><li>• Penywaun Primary School – 15/1909 (Wales), 3/154 (RCT)</li></ul> <p>In terms of the Access to Services indicator the LSOA rankings of the schools affected by the proposed change are as follows:</p> <ul style="list-style-type: none"><li>• Cwmaman Primary School – 652/1909 (Wales), 38/154 (RCT)</li><li>• Hirwaun Primary School – 1429/1909 (Wales), 103/154 (RCT)</li><li>• Mountain Ash Comprehensive School – 523/1909 (Wales), 23/154 (RCT)</li><li>• Penyreglyn Primary School – 521/1909 (Wales), 22/154 (RCT)</li></ul> <p>Penywaun Primary School – 286/1909 (Wales), 4/154 (RCT)</p>
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<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 new provisions will provide additional opportunities for children to access Complex Learning Difficulties, Early Years and Autistic Spectrum Disorder specialist provision.</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>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> <p>The Learner Support Service coordinator who has responsibility for line managing the class and staff will ensure there is a robust transition plan for any pupils moving to the relocated LSC. This process will involve a collaborative approach between Access and Inclusion and the schools affected by the relocation proposal. Robust transition plans developed would be of a bespoke nature dependent on the specific needs of the individual pupils affected.</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.**

Negative impacts identified in this Impact Assessment are centred around the potential short-term disruption of pupils attending the LSCs proposed to relocate. These include a negative disadvantage to the protected characteristics – Disability & Sex.

To mitigate the potential short-term disruption of pupils attending the LSC proposed to relocate, 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. Access and Inclusion has a proven track record of successfully supporting pupils through the relocation of Learning Support Classes. Past relocations have demonstrated that pupils can adapt quickly due to the collaborative efforts of the Local Authority, families and school staff creating a smooth transition and promoting positive outcomes.

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.
- 4.c) 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.
- Data analysis is based on data derived from the Census (2021), PLASC (2024) and WIMD unless otherwise stated.
  - Qualitative reasoning gathered from RCTCBC's Directorate of Education and Inclusion Services 21<sup>st</sup> Century Schools Team.
  - Qualitative reasoning gathered from RCTCBC's Corporate Estates Team.
- 4.d) 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. The Equality Impact Assessment will be monitored and updated following the consultation including comments and data gathered during the consultation process.

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

Yes

No

## **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 [ALNAS@rctcbc.gov.uk](mailto:ALNAS@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

<b>Officer Review Panel Comments</b>	<b>Date Considered</b>	<b>Brief description of any amendments made following Officer Review Panel considerations</b>
Comments from Review panel have been noted and actioned	January 25	Further detail has been added to the Disability and Sex protected characteristic sections of this Impact Assessment.  Updated Section 4
<b>Consultation Comments</b>	<b>Date Considered</b>	<b>Brief description of any amendments made following consultation</b>
In accordance with 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. So as part of seeking views on the school organisation proposals, the consultation also included a question in compliance with the Council’s statutory obligations asking ‘how would the Council’s proposal affect you? All those that responded to this question stated that there would be a positive or no impact on them as a result of implementing the proposals.	Nov 24	No amendments were necessary following the 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 mainly positive and neutral benefits. However, the immediate negative impact of transition for pupils affected by the proposed changes will be mitigated by the development of robust transition plans. In addition, staff working in the LSC that is proposed to be relocated will continue to work alongside specialist staff in Access and Inclusion to ensure expertise is maintained and that the pupils have continuity. Access and Inclusion has a proven track record of successfully supporting pupils through the relocation of Learning Support Classes. Past relocations have demonstrated that pupils can adapt quickly due to the collaborative efforts of the Local Authority, families and school staff creating a smooth transition and promoting positive outcomes.

- 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 impact on disability is extremely positive also due to the delivery of new LSC provision enhancing the educational opportunities for pupils with significant additional learning needs and providing the required additional LSC provision. With the additional classes being established, the number of placements available for pupils with significant additional learning needs has increased by approximately 8% 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 updated 9<sup>th</sup> November 2024,  
updated on 9<sup>th</sup> January 2025

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: 10/01/25

Please submit this impact assessment with any SLT/Cabinet Reports.