

# **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

## **Cabinet**

**2nd October 2024**

### **REPORT OF HEAD OF SUPPORT SERVICES AND TRANSFORMATION RHIANNON CROWHURST**

#### **MATTER FOR DECISION**

**WARDS AFFECTED: All**

#### **STRATEGIC SCHOOLS IMPROVEMENT PROGRAMME (SSIP)- PROPOSAL TO REORGANISE ADDITIONAL LEARNING NEEDS (ALN) PROVISION AT CWMTAE COMPREHENSIVE SCHOOL – PERMISSION TO CONSULT**

#### **Purpose of report**

1. To obtain approval to consult on the proposed closure of the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School, with effect from 1<sup>st</sup> September 2025.

#### **Executive summary**

2. The Council is responsible for ensuring suitable provision is made for pupils with Additional Learning Needs (ALN). Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities.

3. Recent work on reviewing the number and type of planned places and assessment provision across Neath Port Talbot has indicated that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to Autism Spectrum Disorder (ASD), in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years is also in relation to ASD, Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
4. Approval is sought to consult on a proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with SpLD at Cwmtawe Community School and provide education for pupils with SpLD at their catchment mainstream secondary school.
5. There are no specialist LSCs for pupils with SpLD at primary level in Neath Port Talbot and instead learners who are experiencing literacy difficulties are well supported through good high quality learning, differentiation and where appropriate, Additional Learning Provision (ALP) delivered through Individual Development Plans (IDP). The proposal seeks to replicate this model at secondary level.

## **Background**

6. The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools in the right place and ensuring that they are fit for the 21<sup>st</sup> century learner is the challenge facing the Council. Achieving this will involve reviewing the number and type of schools the Council has in its area and assessing whether or not best use is being made of resources and facilities. This will include ensuring suitable provision for those pupils with special educational needs/additional learning needs.

7. Implementing the Strategic School Improvement Programme (SSIP) involves reviewing existing provision and determining the number and type of schools needed to deliver education effectively and efficiently across the County Borough. It will most likely lead to substantial change involving opening new schools, closing existing schools, merging or amalgamating schools, federating schools and promoting new initiatives that support collaborative working between schools. It will also involve re-organising education provision to ensure pupils gain access to and benefit from the specialist support, skills and expertise available within the County Borough.
8. The Council has decided to review its provision on the basis of:
  - the need for places and the accessibility of schools
  - educational standards
  - the quality and suitability of school accommodation
  - effective financial management
9. The Council provides for the pupils of Neath Port Talbot who require specialist support for their educational needs at two community special schools and at learning support/ inclusion centres attached to community primary/secondary schools.
10. Within Neath Port Talbot, there are currently 761 planned places across Learning Support Centres and Special Schools. This includes: 19 LSCs which offer 281 planned places for primary aged pupils with a range of Additional Learning Needs. 8 LSCs at secondary level, which offer 163 funded planned places. These Learning Support Centres offer specialist placements for children and young people with needs including Autism Spectrum Disorder; Social, Emotional and Behavioural Difficulties; Speech, Language and Communication; Hearing Impairment and Moderate / Severe / Profound Learning Difficulties. Education is also provided for pupils in 2 special schools (Ysgol Maes y Coed and Ysgol Hendrefelin), catering for the needs of children and young people with the most complex ALN.

11. Through a robust tracking and monitoring system, Local Authority data indicates that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to ASD, in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to ASD, Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
12. In response to ASD need, additional pupil places have been provided within the last 5 years at primary age in Waunceirch Primary School and Blaenhonddan Primary School, and at secondary age in Dŵr y Felin Comprehensive. 12 additional planned places for pupils with SLD / MLD have also been created within Ysgol Hendrefelin Special School and The Strategic Outline Case (SOC) in respect of the Ysgol Maes y Coed Special School Project has been approved by the Cabinet Secretary for Education and can now progress to the Outline Business Case (OBC) stage to create additional capacity at Ysgol Maes Y Coed for pupils with PMLD.

## **The Proposal**

13. It is proposed to close the LSC for pupils with SpLD at Cwmtawe Community School with effect from 1<sup>st</sup> September 2025.
14. Neath Port Talbot Council are committed to promoting high standards of literacy for all children and young people. All learners should have access to high-quality, well-differentiated 'quality first' teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance.
15. It is recognised that some children and young people find learning to read and write far more challenging than others, despite high quality opportunities and input. Research highlights the importance of

identifying the needs of these individuals early and ensuring that they access a differentiated curriculum to make suitable progress, aligning with national policy and good practice for children and young people with Additional Learning Needs (ALN Code of Practice, 2021 para 20.10).

16. Early assessment and intervention are regarded as not only essential to addressing literacy difficulties, but also as vital to preventing the emotional distress and disengagement from learning that can arise as a result of these barriers to learning. Mainstream schools are best placed to identify and meet the needs of learners with literacy difficulties within a 'literacy-friendly', inclusive environment that promotes children's rights. A focus on quality first teaching, alongside regular whole staff development is essential, as is working in partnership with parents and carers.
17. Through the successful implementation of IDPs, schools are increasingly supporting young people with a range of additional specific learning needs including SpLD. There are currently 10 pupils with SpLD across all Neath Port Talbot who hold a Local Authority Maintained IDP. All are educated and supported within mainstream schools, ensuring they are fully integrated and have equal access to all aspects of mainstream activities and opportunities.
18. The Learning Needs Code for Wales also states:  
*"The Welsh Government considers that an inclusive education, where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all... The ALN system relies on the knowledge and experience of teaching staff to identify ways of providing appropriate access to the curriculum for every child and young person. Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement. The key to this lies in the teaching staff's knowledge of each child and young person's skills and abilities. Consequently, improvements in the teaching and learning of children and young*

*people with ALN cannot be isolated from improvements in the teaching and learning for children and young people across a school or FEI as a whole.”*

19. At present, there are 0 pupils at the Learning Support Centre for pupils with SpLD at Cwmtawe Community School. Additionally, no teachers or support staff are currently employed within the Learning Support Centre.
20. Maintaining a provision with no pupils is not considered to be best use of Council resources, and as such it is proposed that the LSC provision for SpLD should close.

### **Cwmtawe Community School**

21. Cwmtawe Community School is a 11-16 Secondary School for boys and girls, situated in Pontardawe in the Swansea Valley.
22. Currently, the school has the capacity to accommodate 1284 full-time pupils. As of PLASC 2024, there are 1115 full time pupils at the school. The school also hosts a specialist ASD LSC provision for 13 places and a SpLD LSC provision for 12 places.
23. Closing the Cwmtawe Community School LSC for pupils with SpLD will have no detrimental effect on the school's full time pupil capacity.
24. The school was last inspected by Estyn in 2018, and current performance was judged to be excellent and good in all areas. It is reported that 'High aspirations for all pupils are at the heart of the work of Cwmtawe Community School. Most pupils display a positive work ethic and are committed to achieving their potential. They make strong progress in their knowledge, communication and skills and achieve high academic standards.'  
(Estyn 2018)
25. Cwmtawe Community School has a good track record for wellbeing and attitudes towards learning. Estyn report that, 'Most pupils

display positive attitudes to their learning. They are well prepared and settle quickly in lessons, ready to work. Many respond enthusiastically to the teaching and are eager to ask and answer questions. They have a positive work ethic, are highly motivated and sustain their concentration well during tasks.'

26. Estyn also report that: 'The school is a caring and inclusive community, which promotes a culture of high expectations and care for others. The school's mission statement of 'We can, and we will succeed by working together and giving of our best' has a positive effect on pupils' behaviour, wellbeing and academic progress'.
27. The Estyn report also notes that, 'The headteacher and senior leadership team work together successfully to communicate a clear vision based on a culture of high expectations for all pupils. As a result, staff have a strong commitment to 'develop young people to live life to the full and become responsible adults who contribute positively to society'.

### **Quality of school building and accommodation**

28. According to the condition survey carried out in 2015, overall, the school is graded category C for condition. The backlog maintenance for this site is estimated at circa £1,155,822. This figure represents the total cost of all maintenance work identified as being required at the school.
29. There are no capital works planned as a result of this proposal.

### **Consultation**

30. This school organisation proposal is being brought forward under the Council's Strategic School Improvement Programme. Formal consultation is required in line with the Welsh Government's School Organisation Code, November 2018, which specifies the procedures to be followed, including the content of the consultation document and those to be consulted.

31. Subject to approval, it is intended to consult on this proposal between 5<sup>th</sup> November and 16<sup>th</sup> December 2024. Responses to the consultation will be reported to Cabinet for consideration by Members.

### **Impact on pupils**

32. It is anticipated that the proposed changes will have no adverse impact on pupils. The last 5 years has seen a decline in the number of pupils attending Cwmtawe Community School Learning Support Centre for pupils with SpLD. In September 2024, there will be 0 pupils attending the centre. Therefore, the proposal to close the centre will not impact on the pupils currently attending Cwmtawe Community School.
33. For pupils within the Local Authority in receipt of an IDP for SpLD, support is provided in mainstream establishments in line with individual pupil IDPs and forms part of a continuum of support in accordance with the Additional Learning Needs and Education (Wales) Tribunal Act. The Act specifies that mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP.
34. Children and young people with SpLD receive support from specialist staff at different levels, including; consultation for individuals and groups of learners; individual casework and systemic work such as delivering high quality training. Furthermore, Neath Port Talbot Inclusion Service have an agreed SpLD pathway that clearly sets out the graduated response and when it is appropriate to involve relevant professionals. The Inclusion Service will also continue to build the knowledge and capacity of schools to identify needs at an early stage and deliver appropriate support through the delivery of professional training.
35. This proposal also ensures that pupils with SpLD have the opportunity to be taught within their catchment schools alongside their peers, thus reducing the need for additional travel to a LSC. The emotional well-being of children and young people experiencing SpLD is a priority when promoting more positive outcomes for this



group. Within Neath Port Talbot, we are committed to promoting the rights of children and young people. With reference to Article 31 of the United Nations Convention on Rights of a Child (UNRC), it is also very important to ensure a balanced approach in which the child or young person has planned opportunities to relax, play and develop a range of other skills (which they may acquire with greater ease than literacy skills) to support their emotional well-being. Provision to support the confidence and emotional well-being of learners with literacy needs is key and mainstream settings can develop this by ensuring that the children and young people feel part of a learning community which recognises and responds to their needs. Learners should have a strong sense of belonging in their local mainstream school, in which a sense of belonging is a core element of embedding a whole school approach to emotional and mental well-being.

36. There will be no negative impact on pupils attending Cwmtawe Community School as a result of this proposal. Additionally providing targeted support in line with individual pupil IDPs within all mainstream secondary schools in the Local Authority ensures that pupils with SpLD have the opportunity to be taught within their catchment schools, thus reducing the need for additional travel to a LSC and increasing the potential to use well-established walking and cycling routes to school for some pupils.
37. Under the School Travel Plan requirements, all schools, together with the Council's Road Safety Team, are committed to:
  - improving road safety within the local community
  - raising awareness about travel issues
  - encouraging walking, cycling and public transport for the school journey where applicable
  - encouraging independent travel where applicable

### **Impact on additional learning needs provision**

38. Specialist support for pupils with SpLD will be provided in all mainstream establishments including Welsh-medium schools in line with individual pupil IDPs and will form part of a continuum of support in line with ALN Reform. The language medium of ALN provision is integral to the effectiveness and quality of the provision

itself. Passing the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (the Act) was a turning point in this context and established the principle that the ALN system in Wales needs to be bilingual, and therefore Welsh-medium provision is equitable to the English-medium provision.

39. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities in the language of their choice.

### **Financial Impacts**

40. Cwmtawe Community School LSC is funded from the delegated schools budget and the school receives funding for additional places at Band E. In 2023-2024, the school received an additional £17,176 for the one Year 11 pupil attending.
41. The proposal seeks to close the LSC and therefore the school budget would be adjusted accordingly.
42. Should the proposal be approved, the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.
43. There are no capital receipts directly related to this proposal.

### **Integrated Impact Assessment**

44. An Integrated Impact Assessment has been undertaken to assist the Council in discharging its legislative duties under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

45. The assessment has indicated that should the proposal proceed it is likely to have a positive impact on age, disability and sex, and neutral on race, religion or belief and sexual orientation, gender reassignment, marriage and civil partnership and pregnancy and maternity. The proposal may also impact positively on opportunities to use the Welsh language. The proposal will have both neutral and positive impacts on socio economic disadvantage. It is unlikely that the proposal would impact on biodiversity.
46. Following full consultation where views of all stakeholders will be gathered, greater information will be available which will further help to inform the full assessment.

### **Valleys Communities Impacts**

47. The impact on Neath Port Talbot's valley communities will be the same as all other areas of the County Borough as the provision admits pupils from across the whole of the county borough. Currently, there are no pupils attending the centre. Provision for pupils with SpLD will continue to be provided in all mainstream secondary schools throughout the Local Authority.

### **Workforce impacts**

48. Currently there are no additional staff employed at Cwmtawe Community School Learning Support Centre for pupils with SpLD. As a result, staff will not be adversely affected by this proposal.

### **Legal impacts**

49. The proposal will close an ALN provision in a mainstream school (Cwmtawe Community School) where the pupils admitted are in addition to the admission number for the school and where the provision is recognised by the Council as reserved for pupils with ALN. As such, this constitutes a regulated alteration requiring the statutory publication of the proposal. The School Standards & Organisation (Wales) Act 2013 (the Act) provides the legislative framework by which the Council may implement a proposal. The Welsh Government's School Organisation Code, November 2018,

made under Sections 38 and 39 of the Act, imposes on the Council requirements and guidelines on matters relating to school organisation. The Council's procedures are in line with legislative requirements.

## **Risk management**

50. A risk assessment has been carried out under the Council's Risk Management Policy 2015.

51. Potential risk areas in implementing the proposal include:

- educational outcomes for pupils are not improved
- negative response from parents
- discrimination against protected characteristics resulting in a negative impact on one or more protected groups
- staff with appropriate skills and expertise not available in all schools

52. Failing to implement the proposal will result in a range of teaching/learning and financial benefits not being fully realised, particularly in relation to:

- pupils with SpLD are not fully integrated and will not have equal access to all aspects of mainstream activities and opportunities within their catchment/ community school
- Increased financial pressure through funding planned places which are no longer required

53. Given that there are no pupils currently attending the centre and that the needs of pupils with IDPs for SpLD are currently met at mainstream schools within the Local Authority, and that high quality support is available from specialist local authority staff to ensure SpLD pupils are able to fully access mainstream education, the potential effects of the identified risks will be mitigated by implementation of the proposal.

## **Impact on community usage**

54. The proposal should have no adverse impact on the communities at Cwmtawe Community School or at other mainstream schools where SpLD pupils are attending, as the proposal does not affect any community usage.

## **Recommendation**

55. Having given due regard to the integrated impact and risk assessments, it is recommended that, in line with Section 48 of the School Standards and Organisation (Wales) Act 2013, Members approve consultation on a proposal to close the specialist learning support centre provision for secondary age pupils with SpLD at Cwmtawe Community School.

## **Reasons for proposed decision**

56. This decision is necessary to comply with the formal consultation requirements imposed on the Council by the School Organisation Code. Subject to the outcome of consultation, implementation of the proposal will enable the Council to promote high educational standards and the fulfilment of every child's potential. It will also enable the Council to meet its duty to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough.

## **Implementation of the decision**

57. The decision is proposed for implementation after the three-day call-in period.

## **Appendices**

Appendix A: Integrated Impact Assessment

## List of background papers

- a) Strategic School Improvement Programme Principles Paper:  
September 2008  
[https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/\\$CAB-240908-REP-EL-KN.doc.pdf](https://democracy.npt.gov.uk/Data/Cabinet/20080924/Agenda/$CAB-240908-REP-EL-KN.doc.pdf)
- b) Welsh Government - School Organisation Code: November 2018  
<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>
- c) School Standards & Organisation (Wales) Act 2013  
[http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw\\_20130001\\_en.pdf](http://www.legislation.gov.uk/anaw/2013/1/pdfs/anaw_20130001_en.pdf)
- d) Additional Learning Needs and Education (Wales) Tribunal Act  
[Additional Learning Needs and Education Tribunal \(Wales\) Act 2018 \(legislation.gov.uk\)](http://www.legislation.gov.uk/ukpga/2018/12/pdfs/ukpga_20180012_en.pdf)
- e) Learner Travel (Wales) Measure: 2008 & the Learner Travel Statutory Provision and Operational Guidance: 2014  
[http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa\\_20080002\\_en.pdf](http://www.legislation.gov.uk/mwa/2008/2/pdfs/mwa_20080002_en.pdf)  
[Microsoft Word - Contents page - Learner Travel Statutory Provision and Operational Guidance.docx \(gov.wales\)](#)
- f) Home to School Travel Policy  
[npt home to school travel policy 2017.pdf](#)
- g) ALN Code of Practice 2021  
[The Additional Learning Needs Code for Wales 2021 \(gov.wales\)](#)

## **Officer Contact**

Rhiannon Crowhurst

Head of Support Services and Transformation

Email: [r.crowhurst@npt.gov.uk](mailto:r.crowhurst@npt.gov.uk)

Kate Windsor- Brown

Transformation Co-ordinator/ WESP Co-ordinator

Email: [k.windsor-brown@npt.gov.uk](mailto:k.windsor-brown@npt.gov.uk)

## Appendix A: Integrated Impact Assessment

### **Integrated Impact Assessment (IIA)**

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

#### **Version Control**

<b>Version</b>	<b>Author</b>	<b>Job title</b>	<b>Date</b>
e.g. Version 1	Kate Windsor-Brown	Transformation Coordinator	28/08/24

#### **1. Details of the initiative**

	<b>Title of the Initiative:</b> PROPOSAL TO CLOSE THE LEARNING SUPPORT CENTRE FOR PUPILS WITH SPECIFIC LITERACY DIFFICULTIES AT CWMTAWE COMMUNITY SCHOOL
<b>1a</b>	<b>Service Area:</b> Strategic School Improvement Programme
<b>1</b>	<b>Directorate:</b> ELLL
<b>1</b>	<b>Summary of the initiative:</b> Closure of specialist provision for pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School
<b>1</b>	<b>Is this a 'strategic decision'?</b>



	Yes- forming part of the Council's SSIP plan to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough
<b>1</b>	<b>Who will be directly affected by this initiative?</b> Service Users, staff, and members of the community.
<b>1</b>	<b>When and how were people consulted?</b> Informal consultation has taken place with colleagues across the education directorate and involved schools. Formal consultation will take place in Autumn 2024 Consultation will be undertaken at a formative stage and will allow for intelligent consideration and response. The consultation period will be 6 weeks to allow consultees time to consider the proposal and submit comments. A consultation document will be published on Neath Port Talbot Council website and sent directly to relevant consultees. Hard copies will be available on request. The consultation document will invite views and opinions to be submitted in respect of the proposal. The Welsh Government's School Organisation Code requires the Council to consult on its proposal and to publish a consultation report summarising any issues raised by consultees, the Council's response to those issues and Estyn's view of the overall merit of the proposal.
<b>1</b>	<b>What were the outcomes of the consultation?</b> Information to be provided following consultation period and IIA to be updated at this stage

## 2. Evidence

<b>What evidence was used in assessing the initiative?</b>
<p>A great deal of information is available with relation to the population within Neath Port Talbot. This can be accessed from the following sources.</p> <ul style="list-style-type: none"> <li>• Equality Act 2010</li> <li>• Welsh Language Standards (No.1) Regulations 2015</li> <li>• Well-being of Future Generations (Wales) Act 2015</li> <li>• Environment (Wales) Act 2016</li> </ul>

- NPT WESP 2022-2032
- Consultation Report
- Welsh Index of Multiple Deprivation (WIMD)
- School Organisation Code, 2018
- Pupil Level Annual School Census (PLASC) data has also been used along with the Local Authority data relating to school staff

Recent work on reviewing the number and type of planned places and assessment provision across Neath Port Talbot has indicated that there is a need for extra places in the areas of Autistic Spectrum Disorder (ASD), Speech and Language Difficulties (SLD), Social, Emotional and Behavioural Difficulties (SEBD) and Profound and Multiple Learning Difficulties (PMLD). This work has also been used to assess the impact of the proposal.

Following formal consultation, a Consultation Report will be prepared summarising the comments received and officer responses. Comments received will be considered and where appropriate will form part of the ongoing impact assessment. The report should be read alongside this impact assessment.

Respondents to the consultation will also be asked to complete an Equalities Monitoring form included in the consultation document and any highlighted impacts will also be carefully considered.

### 3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+	Why will it have this impact?
Age	x			The Equality Duty covers the protected characteristic of age, which refers to a person having a particular age or being within an age group.

			<p>This proposal seeks to close a specialist learning support centre for secondary aged children with SpLD. Current data indicates that there are currently 0 pupils attending the LSC in Cwmtawe Community School (PLASC 2023). Therefore closure of the LSC will have no direct negative impact on any pupils or staff at the school.</p> <p>Pupils with SpLD will benefit from attending their catchment secondary school with their peers from their primary years and will also benefit from the opportunity to experience a full mainstream curriculum.</p> <p>Neath Port Talbot council are committed to promoting high standards of literacy for all children and young people. All learners should have access to high-quality, well-differentiated 'quality first' teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance. Research highlights the importance of identifying the needs of these individuals early and ensuring that they access a differentiated curriculum to make suitable progress, aligning with national policy and good practice for children and young people with Additional Learning Needs (ALN Code of Practice, 2021 para 20.10).</p> <p>Early assessment and intervention is regarded as not only essential to addressing literacy difficulties, but also as vital to preventing the emotional distress and disengagement from learning that can arise as a result of these barriers to learning. Schools are best placed to identify and meet the needs of learners with literacy difficulties within a 'literacy-friendly', inclusive environment that promotes children's rights. A focus on quality first teaching, alongside regular whole staff development is essential, as is working in partnership with parents and carers.</p> <p>The implementation of this proposal therefore should have a positive impact on all pupils with SpLD and also on other pupils who will also benefit from differentiated teaching and learning approaches.</p>
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			It is therefore expected that this proposal will have an overall positive impact on this aspect.
Disability	x		<p>The Council's arrangements for education across the county borough include those children and young people with a disability.</p> <p>This proposal seeks to close a specialist learning support centre for secondary aged children with SpLD. Data indicates that there are 10 pupils with SpLD across all Neath Port Talbot who hold a Local Authority Maintained IDP. All are educated and supported within mainstream schools, ensuring they are fully integrated and have equal access to all aspects of mainstream activities and opportunities, therefore closure of the LSC will have no direct negative impact on any pupils with SpLD.</p> <p>Within Neath Port Talbot, there are currently 761 planned places across Learning Support Centres and Special Schools. This includes: 19 LSCs which offer 281 planned places for primary aged pupils with a range of Additional Learning Needs. 8 LSCs at secondary level, which offer 163 funded planned places. These Learning Support Centres offer specialist placements for children and young people with needs including Autism Spectrum Disorder; Social, Emotional and Behavioural Difficulties; Speech, Language and Communication; Hearing Impairment and Moderate / Severe / Profound Learning Difficulties. Education is also provided for pupils in 2 special schools (Ysgol Maes y Coed and Ysgol Hendrefelin), catering for the needs of children and young people with the most complex ALN.</p> <p>Through a robust tracking and monitoring system, Local Authority data indicates that at primary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains in relation to Autism Spectrum Disorder (ASD), in addition to Severe and Profound Multiple Learning Difficulties (SLD/ PMLD). At secondary level, the greatest area of need and therefore demand on specialist provision for the next 3 years remains is also in relation to Autism</p>

			<p>Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD). This proposal seeks to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough as any savings made from the closure of the LSC will be used to address pressures in high need ALN areas.</p> <p>The Council is required to have regard for the needs of disabled learners and learners with learning difficulties when assessing transport needs.</p> <p>Transport decisions made on Additional Learning Needs (ALN) grounds form part of the Children and Young People service's arrangements for children with additional learning needs. The Council will make suitable arrangements for learners with special needs to attend school including arrangements, as necessary, for home to school travel. An assessment of a learner's level of travel need will inform the type/level of transport that may need to be provided. The entitlement will be reviewed on an annual basis. (Home to School Travel Policy Neath Port Talbot Council). There is no negative impact on pupils with SpLD and transport needs as a result of this proposal.</p> <p>It is therefore expected that this proposal will have an overall positive impact on this aspect.</p>
Gender reassignment		x	<p>It is expected that all NPTCBC schools meet the needs of pupils and staff who are transgender.</p> <p>Local Authority and school policies are in place in all mainstream schools in terms of gender reassignment. Employees and pupils within the schools are protected by the policies adopted by the Governing Body.</p> <p>The proposal will have a neutral impact on this aspect.</p>

Marriage & civil partnership			x	<p>Pupils at most of the mainstream schools are below the legal marriage age. Staff at all mainstream schools receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at the school.</p> <p>Employees within all schools will be protected by the policies adopted by the Governing Body and will have access to suitable HR advice.</p> <p>The proposal will have a neutral impact on this aspect.</p>
Pregnancy and maternity			x	<p>The provision of education for any pupil identified as being within this protected group would remain unaltered by the proposal.</p> <p>Employees within all schools will be protected by the policies adopted by the Governing Body and will have access to suitable HR advice.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Race			x	<p>All Neath Port Talbot schools are inclusive for pupils of all ethnic groups and ethnicity is not a criterion under the Council's Admissions Policy. In addition, the Council is an inclusive employer.</p> <p>Employees of schools within the Local Authority will be entitled to receive protection under the relevant employment and equalities law and policies which will be adopted by the Governing Body.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Religion or belief			x	<p>It is expected that the Council's educational arrangements will meet the needs of pupils or staff members of different religions or with different beliefs within all schools.</p> <p>Religion or belief is not a criterion under the Council's Admissions Policy.</p>

			<p>Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing Body and Council in order to support the staff at all schools.</p> <p>Respect for all religious and non-religious beliefs would not change as a result of implementing this proposal. Similarly, the aspect of the curriculum relating to religion and belief would not change because of this proposal. The proposal does not seek to reduce the number of faith school places and increase the number of community (not-faith based) school places.</p> <p>The Estyn School Inspection Handbook also details how inspection would evaluate how well individual pupils benefit from the school. Under spiritual, moral, social and cultural development Estyn would look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation and disability.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>
Sex	x		<p>The Council is an inclusive employer. Across the Local Authority both male and female staff are employed within secondary education settings.</p> <p>Children of both sexes are treated and taught equally at all school within the Local Authority. There are no different methods of teaching or curricula based on sex. All schools aim to reduce, as far as possible, segregating pupils and students by gender.</p> <p>In general more boys than girls experience SpLD although often girls can experience more complex difficulties. Currently in NPT, of the pupils with a LA maintained IDP 60% are boys, matching the general trend across the UK.</p> <p>The benefits of support being provided in all mainstream schools, is likely to benefit both male and female pupils, ensuring that their peer groups are also extended</p>

				<p>beyond those pupils attending a provision and widening their curriculum opportunities.</p> <p>The proposal therefore is likely to have a positive impact on this aspect.</p>
Sexual orientation			x	<p>Inclusivity and respect of others is an intrinsic element of the National Curriculum, and all schools within the Local Authority seek to provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation.</p> <p>The proposal therefore is likely to have a neutral impact on this aspect.</p>

### What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored with information gathered regarding characteristics and circumstances of the individuals involved. From the evidence currently available the proposal should have mainly positive or neutral impacts on the protected characteristics due to the following actions-

- All current pupils with SpLD are supported within mainstream schools in line with individual development plans and the 12 planned places in the LSC remain unfilled; additionally there are no staff employed for the LSC - therefore there is no direct negative impact on either pupils or staff
- Providing SpLD pupils with support in their catchment school alongside pupils from their primary phase education is considered to be beneficial for pupil wellbeing and sense of belonging
- Policies and procedures are in place in all schools to support with inclusive practice; local authority policies are also adopted and adhered to

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?



Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			<p>Policies adopted by the Governing Body of all schools and teaching and learning will aim to eliminate discrimination, harassment and victimisation. Employees within all schools school are protected by Local Authority policies and policies adopted by the Governing Body and have access to suitable HR advice.</p> <p>Pupils are protected by Local Authority policies and policies adopted by the Governing Body.</p> <p>Pupils with an additional learning need could be at risk of discrimination, harassment and victimisation by others. Inclusion of pupils with SpLD within mainstream classes does not only support SpLD pupils but will also aim to raise awareness with other mainstream pupils and staff about SpLD, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation. Pupils with SpLD moving into their catchment secondary school will have the opportunity to maintain and develop friendships forged in primary school years which can help with self-confidence and resilience.</p> <p>The National Curriculum also promotes inclusivity and acceptance through teaching and learning within the school.</p> <p>The Learning Needs Code for Wales also states:</p> <p><i>“The Welsh Government considers that an inclusive education, where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all... The ALN system relies on the knowledge and experience of teaching staff to identify ways of providing appropriate access to the curriculum for every child and young person. Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement.</i></p>

To advance equality of opportunity between different groups	x			As noted above, there are no pupils or staff to assess within the LSC for pupils with SpLD in Cwmtawe Community School. Support for pupils with SpLD within mainstream classes ensures that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater equality of opportunity.
To foster good relations between different groups	x			The emotional well-being of children and young people experiencing SpLD is a priority when promoting more positive outcomes for this group. Provision to support the confidence and emotional well-being of learners with literacy needs is key and mainstream settings can develop this by ensuring that the children and young people feel part of a learning community which recognises and responds to their needs. Learners should have a strong sense of belonging in their local mainstream school, in which a sense of belonging is a core element of embedding a whole school approach to emotional and mental well-being.

**What action will be taken to improve positive or mitigate negative impacts?**

This proposal, if implemented would be closely monitored in regards to the Public Sector Equality Duty (PSED). From the evidence currently available the proposal should have mainly positive impacts on PSED due to the following actions-

- Inclusion of pupils with SpLD within mainstream classes does not only support SpLD pupils but will also aim to raise awareness with other mainstream pupils and staff about SpLD, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation.
- Raising awareness and promoting greater understanding of SpLD in mainstream classes helps to foster good relationships between all pupils.
- Staff at all mainstream schools will continue to raise awareness of inclusivity and will ensure that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater equality of opportunity.

**4. Socio Economic Duty**

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>The proposal, if implemented, should have a positive impact on groups who experience socio economic disadvantage.</p> <p>The proposal aims to provide local, accessible, sustainable, community-focused provision for pupils with SpLD within their catchment school within the Local Authority.</p> <p>For some pupils, distance to their catchment mainstream school would be closer than to a provision, this could result in the ability to work/cycle to school potentially leading to reduced travel costs for parents</p> <p>The proposal would therefore have a positive impact in this regard.</p>
Negative/Disadvantage	<p>As there are currently no pupils or staff at the LSC for SpLD at Cwmtawe Community school there should be no direct negative impact at the current time as a result of this proposal.</p>
Neutral	<p>Currently, specialist support for pupils with SpLD is provided in all mainstream establishments in line with individual pupil IDPs and forms part of a continuum of support in line with the ALN Reform Act. The implementation of this proposal will not affect the current provision for pupils with SPLD within all mainstream schools. Support will be provided regardless of any specific socio-economic disadvantage.</p> <p>There are no staff members employed within the LSC for pupils with SpLD in Cwmtawe Community School therefore no staff members will be affected by the closure of the provision.</p>

What action will be taken to reduce inequality of outcome
<ul style="list-style-type: none"> <li>• Progress of pupils across NPT with an IDP identifying their need as SpLD will be monitored by the local authority to ensure that there are no negative impacts as a result of the implementation of this proposal.</li> <li>• Monitoring of the support available and of the improved awareness of SpLD in all mainstreams secondary schools will take place annually</li> </ul>

## 5. Community Cohesion/Social Exclusion/Poverty

	+	-	+	Why will it have this impact?
Community Cohesion			x	It is not expected that the closure of a provision with no pupils or staff will impact on community cohesion
Social Exclusion	x			Continuing to support pupils with SpLD within mainstream classes ensures that all pupils have equal access to opportunities in ways relevant to their needs and ensures that they fully belong to the school community, thus providing greater social inclusion.
Poverty	x			Continuing to support pupils with SpLD within mainstream classes ensures that pupils are not at risk of participation poverty by providing opportunities for them to be included in activities experienced by their peers in their catchment school.

### What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored in regards to Community Cohesion/Social Exclusion/Poverty. From the evidence currently available the proposal should have mainly positive and neutral impacts on Community Cohesion/Social Exclusion/Poverty due to the following actions-

- There are no pupils or staff at the learning support centre for pupils with SpLD at Cwmtawe Community School so there is no direct impact
- Implementing the proposal will ensure that the positive impacts identified are realised
- Secondary school staff will continue to raise awareness of inclusivity and promote inclusion further throughout the schools

## 6. Welsh

	+	-	+/	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	x			Cwmtawe Community School Learning Support Centre for pupils with SpLD is an English-medium provision. Following the proposed implementation of this proposal, specialist support for pupils with SpLD will continue to be provided in all mainstream establishments including Welsh-medium schools in line with individual pupil IDPs and will form part of a continuum of support in line ALN Reform. The language medium of Additional Learning Needs (ALN) provision is integral to the effectiveness and quality of the provision itself. Passing the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (the Act) was a turning point in this context and established the principle that the ALN system in Wales needs to be bilingual, and therefore Welsh-medium provision is equitable to the English-medium provision. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities in the language of their choice.
– treating the Welsh and English languages equally	x			

### What action will be taken to improve positive or mitigate negative impacts?

This proposal, if implemented would be closely monitored in regard to Welsh. From the evidence currently available the proposal should have mainly positive and neutral impacts on the Welsh language. Actions to improve positive impacts will include:

- Ensure that specialist Welsh language SpLD resources are available for all pupils (DACC (Datblygu Addysg Cynhwysfawr Cymraeg) Welsh-medium ALNCo group to monitor this)
- Ensure appropriate language support for secondary schools wishing to move along the language continuum i.e. teachers increasing the use of Welsh within lessons.

## 7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	<p>Neath Port Talbot County Borough Council (NPTCBC) has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of ecosystems under the Environment (Wales) Act 2016. The Council's Biodiversity Duty Plan demonstrates how we will fulfil that duty and will act as a driver for conservation activities throughout Neath Port Talbot (NPT).</p> <p>The Biodiversity Duty Plan not only delivers our statutory duties with regards to biodiversity but also explains how, through meeting the Biodiversity Duty, we are delivering well-being objectives and the ways of working under the Well-being of Future Generations (Wales) Act 2015.</p> <p>This is not a criterion that will be impacted upon by this proposal</p>
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	

What action will be taken to improve positive or mitigate negative impacts?
<ul style="list-style-type: none"> <li>Any future impacts will be monitored closely following the proposed closure of the LSC</li> </ul>

## 8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
<p>i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead</p>	<p>This proposal will support the Councils wellbeing objective 1 – ‘all children get the best start in life’ by ensuring that resources are utilised effectively in line with need.</p> <p>Cwmtawe Community School is currently receiving additional funding to manage the 12 planned places within the LSC for pupils with SpLD with 0 pupils attending in September 2024. The provision is funded from the delegated schools budget and the school receives funding for additional places at Band E which equates to approximately £17,176 per annum. Should the proposal be approved, the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.</p>
<p>ii. <b>Prevention</b> – preventing problems occurring or getting worse</p>	<p>Closing the specialist provision and continuing to support pupils with SpLD within the Local Authority’s mainstream schools in line with individual pupil IDPs forms part of a continuum of support in line with the ALN Reform Act. In line with the Additional Learning Needs Code for Wales, mainstream schools have a duty to deliver additional learning provisions (ALP) to support learners with ALN as set out in their IDP. This will ensure that pupils with SpLD are fully integrated and will have equal access to all aspects of mainstream activities and opportunities.</p>
<p>iii. <b>Collaboration</b> – working with other services internal or external</p>	<p>A range of Council services are involved in ensuring that appropriate support is provided to pupils with IDPs and this forms part of a continuum of support in line with the ALN Reform Act,</p>

iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population	Informal consultation has taken place with a range of stakeholders to help shape the proposal. Additionally the proposal will be subject to a comprehensive consultation with a wide range of stakeholders for a six week period.
v. <b>Integration</b> – making connections to maximise contribution to:	This proposal has a positive contribution to the Council’s well-being objectives as it aims to ensure that pupils with SpLD are supported and are able to make progress within mainstream classes and settings.
<b>Council’s well-being objectives</b>	The Council’s well-being objectives and the supporting improvement priorities are set out in the Council’s Corporate Plan. This proposal directly supports wellbeing objective – ‘to ensure all children get the best start in life’ by ensuring that resources are utilised effectively in line with need.
<b>public bodies objectives</b>	This proposal indirectly supports the Public Services Board priority to promote well-being through and in the workplace

## 9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

If the proposal is implemented then school staff within mainstream settings will monitor the progress and wellbeing of pupils with SpLD to ensure that identified positive impacts are being implemented. Monitoring will take place on a regular basis by Support for Learning and Inclusion officers, ESO officers and outside bodies including Estyn.



## 10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
<b>Equalities</b>	The proposal will have a positive impact on age, disability and sex, and neutral on race, religion or belief and sexual orientation, gender reassignment, marriage and civil partnership and pregnancy and maternity.
<b>Socio Economic Disadvantage</b>	The proposal will have both neutral and positive impacts on socio economic disadvantage.
<b>Community Cohesion/ Social Exclusion/Poverty</b>	The proposal will have a neutral impact on community cohesion but should have a positive impact on social exclusion and poverty
<b>Welsh</b>	The proposal will have a positive impact on the Welsh language
<b>Biodiversity</b>	The establishment of the provision has no impact on biodiversity
<b>Well-being of Future Generations</b>	This proposal directly contributes to the Council's wellbeing objective 'to ensure all children get the best start in life'.

### Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised X
- **Make adjustments** - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions
- **Justification** - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities
- **STOP** - redraft the initiative as actual or potential unlawful discrimination has been identified

Please provide details of the overall conclusion reached in relation to the initiative

In conclusion the proposal would have a mainly positive or neutral impact in all areas, and directly contributes to ensuring that pupils are given the best start in life. It will ensure that pupils with SpLD are given the opportunity to access high-quality, well-differentiated 'quality first' teaching across the curriculum within our mainstream schools and settings, as informed by current research and national guidance. It provides the opportunity to redistribute resources to better meet the needs of ALN pupils across NPT.

### 11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Ensure all schools have the appropriate policies in place and are aware of how to support pupils with SPLD in mainstream settings	Inclusion Team	Ongoing	Monitoring indicates good progress is made

### 12. Sign off

	Name	Position	Signature	Date
Completed by	Kate Windsor-Brown	Transformation Coordinator		04.09.24

<b>Signed off by</b>	<b>Rhiannon Crowhurst</b>	<b>Head of Service/Director</b>		<b>04.09.24</b>
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