

# **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL**

## **Cabinet**

**5<sup>th</sup> February 2025**

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

#### **MATTER FOR DECISION**

**WARDS AFFECTED: All**

#### **Strategic Schools Improvement Programme Proposal to reorganise ALN Provision at Cwmtawe Comprehensive School - Results of Consultation and permission to advertise Notice for Objections**

#### **Purpose of report**

1. To obtain approval to publish a proposal to close 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.
2. Publication of the proposal provides a 28 day period for the submission of objections. Following the period for submitting objections, Cabinet members will need to meet to consider objections received before taking a decision as to whether or not the proposal should be implemented.

#### **Executive summary**

3. 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.

4. 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 Autism Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
5. This proposal seeks to ensure that resources are utilised effectively in line with the demand for specialist provision within the County Borough. Therefore approval is sought to publish 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.
6. 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.
7. Cabinet at its meeting of 2<sup>nd</sup> October 2024 approved consultation on a proposal to close 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.
8. The outcome of consultation informs this report, which needs to be read in conjunction with the consultation report (appendix A), the

consultation document (appendix E) and the Cabinet report of 2<sup>nd</sup> October 2025.

9. The proposal seeks to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough. Current demand is not in relation to pupils with Specific Literacy Difficulties (SpLD).

## **Background**

10. 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.
11. 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.
12. 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

13. 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.
14. 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.
15. 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 Spectrum Disorder (ASD), Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD).
16. 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.

17. The proposal seeks to ensure that resources are utilised effectively in line with the need for specialist places within the County Borough.

### **The Proposal**

18. It is proposed to close the LSC for pupils with SpLD at Cwmtawe Community School with effect from 1<sup>st</sup> September 2025.
19. 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.
20. 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).
21. 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.

22. 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.
23. The Learning Needs Code for Wales 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.”*
24. 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.
25. 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.

## **Consultation**

26. 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.

27. Consultation on this proposal commenced on November 5<sup>th</sup>, 2024 with comments invited until December 16<sup>th</sup> 2024. Consultees specified in the School Organisation Code were emailed the consultation document.
28. 2 written responses were received. ESTYN expressed support for the proposal while Pontardawe Town Council stated that they do not feel strongly one way or another regarding the proposal.
29. The written consultation responses are available for Member perusal as an appendix to the report document.
30. It is the opinion of officers that, given the level of support from the school for the proposal, there are no issues arising from the consultation suggesting that the proposal should be reconsidered. The specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School, should be closed with effect from 1<sup>st</sup> September 2025.

### **Estyn response**

31. It is Estyn's opinion that the proposal is likely to, at least, maintain the standard of education provision in the area. Fuller commentary is set out in the consultation report (appendix B).

### **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.

### **Impact on travel arrangements**

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. The integrated impact assessment is included as Appendix C.

### **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.

### **Publication of proposals**

55. Member approval is sought to publish the proposal in line with the requirements of the School Organisation Code. A draft statutory notice accompanies this report (Appendix D). It is intended to publish the proposal on 4<sup>th</sup> March 2025, allowing 28 days for receipt of objections, i.e. until 31<sup>st</sup> March 2025.

### **Scrutiny Observations**

56. (To be completed following Scrutiny)

### **Recommendation**

57. Having given due regard to the responses to consultation, and 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 the statutory publication of a proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School.

58. The proposed date of implementation to be 1<sup>st</sup> September 2025.

59. Notice of the proposal to be published on 4<sup>th</sup> March 2025, allowing 28 days for receipt of objections.

### **Reasons for proposed decision**

60. This decision is necessary to comply with the formal publication requirements imposed on the Council by the School Organisation Code and associated legislation. A draft statutory notice is attached as appendix D. 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**

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

## **Officer Contact**

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## **Appendices**

Appendix A: Consultation Report

Appendix B: Estyn Response

Appendix C: Integrated Impact Assessment

Appendix D: Draft Statutory Notice

Appendix E: Consultation Document