

# **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 re-organise ALN Provision at Cefn Saeson 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 visual impairment at Cefn Saeson Comprehensive 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 provision for secondary age pupils with visual Impairment at Cefn Saeson Comprehensive School and instead ensure pupils with visual impairment are educated locally within inclusive learning environments in mainstream school settings. This approach is based upon research which highlights the importance of identifying the needs of individuals early and ensuring that they access a differentiated curriculum to enable 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). Reinforcing the graduated response and, where necessary, providing external advice, guidance and intervention that is delivered by specialist staff within mainstream schools has enabled the integration of these learners and has resulted in no current demand for placements at a Learning Support Centre for pupils with visual impairment.
6. Neath Port Talbot currently do not have any specialist LSCs for pupils with visual impairment at primary level and instead learners who experience visual impairment are well supported through good

high quality learning, differentiation and where appropriate, Additional Learning Provision delivered through Individual Development Plans (IDPs). The proposal therefore seeks to replicate this model at secondary level.

7. Cabinet at its meeting of 23<sup>th</sup> October 2024 approved consultation on a proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with visual impairment at Cefn Saeson Comprehensive 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 23<sup>th</sup> October 2024.
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 visual impairment.

## **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 Learning Support Centre for pupils with visual impairment Cefn Saeson Comprehensive School with effect from 1<sup>st</sup> September 2025
19. Neath Port Talbot Council are committed to promoting high standards of learning for all children and young people. All learners should have access to high-quality, well-differentiated 'quality first' teaching across the curriculum within mainstream schools and settings, as informed by current research and national guidance. All mainstream schools and settings are provided with advice for Inclusive Learning Provision (ILP) and ALP, which further details how to include pupils with a visual impairment.

20. Through the successful implementation of IDPs, schools are increasingly supporting young people with a range of additional specific learning needs including VI. There are currently 11 secondary age pupils in receipt of a Local Authority Maintained IDP in Neath Port Talbot, none of whom attend the VI LSC at Cefn Saeson Comprehensive School (PLASC 2024).
21. 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.”*
22. There are currently 2 planned places for the VI LSC but 0 pupils are attending. Additionally, no teachers or support staff are currently employed within the VI LSC.
23. There is no primary LSC for VI. On transition to secondary provision, parents have opted for local mainstream secondary provision instead of the Cefn Saeson LSC, which has enabled continued access to peer friendships and greater ease of access to extra-curricular activities and community events.
24. Many visual impairments present in teenage years, when pupils have made firm relationships within their catchment secondary school. No pupils have opted to move to the LSC in Cefn Saeson Comprehensive School.

## **Consultation**

25. 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.
26. 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.
27. 1 written response from ESTYN was received which expressed support for the proposal.
28. The written consultation response is available for Member perusal as an appendix to the Consultation Report document.
29. 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 visual impairment at Cefn Saeson Comprehensive School, should be closed with effect from 1<sup>st</sup> September 2025.

## **Estyn response**

30. It is Estyn's opinion that the proposal is likely to maintain or improve the standard of education provision in the area. Fuller commentary is set out in the consultation report (Appendix A) and ESTYN response (Appendix B).

## **Impact on pupils**

31. 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 Cefn Saeson Comprehensive School LSC for pupils with VI. Since 2022, no pupils have attended the centre. Therefore, the proposal to close the centre will not have a

detrimental impact on the pupils currently attending Cefn Saeson Comprehensive School.

32. For pupils within the Local Authority in receipt of an IDP for VI, support is provided in mainstream, special school and LSCs (for other areas of need such as ASD) 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.
33. Children and young people with VI receive support from specialist staff at different levels, including; consultation for individual learners, individual casework and systemic work such as delivering high quality training to staff and 1:1 direct teaching as required. Furthermore, Neath Port Talbot Inclusion Service have a referral system where a pupil who is noted as being visually impaired by Heath professionals or is displaying concerning visual behaviours can be referred to the Visual Impairment Team for advice and input if deemed necessary following assessments. The Inclusion Service will also continue to build the knowledge and capacity of schools and Early Year settings to identify needs at an early stage and deliver appropriate support through the delivery of professional training.
34. This proposal also ensures that pupils with VI have the opportunity to be taught within their catchment schools alongside their peers, thus reducing the need for additional travel to a Learning Support Centre. The emotional well-being of children and young people experiencing VI 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 to



support their emotional well-being. Provision to support the confidence and emotional well-being of learners with visual impairment 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**

35. There will be no negative impact on pupils attending Cefn Saeson Comprehensive 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 VI 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.
36. 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**

37. Specialist support for pupils with VI 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 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 (ALPs) to support learners with ALN as set out in their IDP. This will ensure that pupils with VI are fully integrated and will have equal access to all aspects of mainstream activities and opportunities in the language of their choice.

### **Financial Impacts**

38. Cefn Saeson Comprehensive School LSC is funded from the delegated schools budget and the school receives funding for additional places. In 2023-2024, the school received an additional £33,928.
39. The proposal seeks to close the LSC and therefore the school budget would be adjusted accordingly.
40. Should the proposal be approved, the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.
41. There are no capital receipts directly related to this proposal.

### **Integrated Impact Assessment**

42. 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.
43. 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.

44. The integrated impact assessment is included as Appendix C.

### **Valleys Communities Impacts**

45. 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 at Cefn Saeson Comprehensive School. Provision for pupils with VI will continue to be provided in all mainstream secondary schools throughout the Local Authority.

### **Workforce impacts**

46. Currently there are no staff employed at Cefn Saeson Comprehensive School LSC for pupils with VI. As a result, staff will not be adversely affected by this proposal.

### **Legal impacts**

47. The proposal will close an ALN provision in a mainstream school (Cefn Saeson Comprehensive 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**

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

49. Potential risk areas in implementing the proposal include:

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

50. 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 VI are not fully integrated into mainstream schools and will not have equal access to all aspects of mainstream activities and opportunities within their catchment school
- Increased financial pressure through funding planned places which are no longer required

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

## **Impact on community usage**

52. The proposal should have no adverse impact on the communities at Cefn Saeson Comprehensive School, or at mainstream schools where VI pupils are attending as the proposal does not affect any aspect of community usage.

## **Scrutiny Observations**

53. (to be added after scrutiny)

## **Publication of proposals**

54. 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. 31<sup>st</sup> March 2025.

## **Recommendation**

55. 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 visual impairment at Cefn Saeson Comprehensive School

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

57. 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**

58. 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**

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

## **Officer Contact**

### **Rhiannon Crowhurst**

Head of Support Services and Transformation

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

### **Kate Windsor-Brown**

Transformation Coordinator

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

## **Appendices**

Appendix A: Consultation Report

Appendix B: Estyn Response

Appendix C: Integrated Impact Assessment

Appendix D: Draft Statutory Notice

Appendix E: Consultation Document



