



**Neath Port Talbot**  
**Castell-nedd Port Talbot**  
County Borough Council Cyngor Bwrdeistref Sirol

Appendix A

## Education, Leisure & Lifelong Learning Service Strategic School Improvement Programme

**PROPOSAL TO CLOSE THE LEARNING SUPPORT  
CENTRE FOR PUPILS WITH VISUAL IMPAIRMENT AT  
CEFN SAESON COMPREHENSIVE SCHOOL, AFAN  
VALLEY ROAD, CIMLA, NEATH, SA11 3TA**

### **CONSULTATION REPORT**



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this document are available on request

## **CONSULTATION REPORT**

### **Responses from formal consultation on the proposal to close the Learning Support Centre for pupils with visual impairment (VI) at Cefn Saeson Comprehensive School, Afan Valley Road, Cimla, Neath, SA11 3TA.**

#### **Introduction**

The Council has consulted with interested parties on its proposal to close the Learning Support Centre for pupils with visual impairment (VI) at Cefn Saeson Comprehensive School. If implemented, this proposal will take effect on September 1<sup>st</sup> 2025.

#### **Background to the proposal**

The Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools and provisions in the right place and ensuring that they are fit for the 21st 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.

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.

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

## **The proposal and why change is being proposed**

It is proposed to close the LSC for pupils with VI at Cefn Saeson Comprehensive School with effect from 1<sup>st</sup> September 2025.

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.

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).

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.”*

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.

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

### **What options have been considered?**

The Council has the responsibility for ensuring that it is making the most effective use of resources and facilities in order to deliver the very best educational opportunities for children and young people.

#### **Option 1 – status quo, maintain existing provision in Neath Port Talbot**

The Council has a responsibility to review the number and type of schools it has and whether or not it is making the best use of resources and facilities to deliver suitable educational opportunities for the children and young people of Neath Port Talbot.

Maintaining the status quo at Cefn Saeson Comprehensive School LSC for pupils with VI is not considered to be best use of resources and facilities and would result in funding the LSC with no pupils present. This could result in financial resources not being repurposed to provide additional provision in areas where we have identified the greatest need.

Maintaining the status quo will not realise opportunities to address concerns or to alleviate the current pressure to address demand for places in other areas. On the grounds of efficient use of public money, maintaining a provision with no pupils is not considered to be best use of Council resources.

This option is not preferred by officers.

#### **Option 2 – Close the Cefn Saeson Comprehensive LSC for pupils with VI and continue to provide additional support in mainstream settings**

Continue to provide specialist support for pupils with VI in all mainstream establishments in line with individual pupil IDPs. This will form 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 (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.

This option provides a more effective use of public money as the funding will be repurposed to provide additional provision in areas where we have identified the greatest need.

This option is preferred by officers.

### **Preferred Option - Option 2**

Having considered information gathered to date, it is the view of officers that Option 2 outweighs the alternative considered as it is this option that ensures that financial resources are used efficiently and are directed towards the greatest needs. Currently there are no pupils accessing the funded Cefn Saeson Comprehensive School LSC for pupils with VI as all secondary age pupils with IDPs for visual impairment within the Local Authority are placed within mainstream classes in our secondary schools. Option 2 also ensures that Welsh first language secondary age pupils with IDPs for VI can continue with their Welsh-medium education within a Welsh-medium secondary school. It is, therefore, preferred as the basis of consultation.

## **Legislative Process**

On 23<sup>rd</sup> October 2024, the Council's Cabinet determined to consult on the proposal to close the Learning Support Centre for pupils with visual impairment (VI) at Cefn Saeson Comprehensive School. The consultation period ran from 5<sup>th</sup> November 2024 to 16<sup>th</sup> December 2024. A list of consultees is included at Appendix 1. The consultation document was made available by e-mail to consultees. It was also available on the Council's website. Hard copies were available on request.

The consultation document invited views and opinions to be submitted in respect of the proposal. Under the Welsh Government Statutory Code for School Organisation the Council is required 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.

## **Consultation Responses**

One written responses from ESTYN was received on this proposal.

### **Estyn response to the proposal:**

Estyn overall response to the proposal states that the proposal is likely to maintain or improve the standard of education provision in the area. ESTYN note, 'The local authority has given a clear rationale for the proposal'.

Additionally, ESTYN note,' The consultation document sets out a clear description of the proposal to close the unit, the projected timetable for statutory procedures and the implementation of the proposals from September 2025. There are only two options available: to retain or close the LSC. The local authority explains fairly the benefits for pupils with visual impairment of attending their local schools and the financial saving from closing the unit which would be repurposed to support areas of greater need, notably provision for pupils with autistic spectrum disorder and social, emotional and behavioural difficulties'.

The following is also noted, 'Given that there are no pupils currently using the LSC, there are unlikely to be any adverse impacts of the proposal on pupils, parents or staff. What isn't clear within the consultation document is what will happen to the space the unit currently comprises within Cefn Saeson Comprehensive School. The LSC is additional to the capacity of the school and so its closure is likely to mean a slight increase in the school's overall capacity. The school is projected to have about 63 surplus spaces by 2029. However, since the unit has only two pupils allocated to it, the extra space is likely to have a very small impact on the school's overall capacity.

In response, the Local Authority agree with ESTYN that the extra space is likely to have a very small impact on the school's overall capacity.

ESTYN note, 'In 2023-2024, the LSC cost £33,928 and the plan is that future funding will be used to support areas of greater need within the Inclusion service. It isn't clear from the consultation document what the funding from September 2022 until April 2025 has been used for while there have been no pupils within the LSC. It also isn't clear what will happen to the funding for the period April 2025 – August 2025 before the unit closes in September 2025'.

In response, the funding from September 2022 until August 2025 will be to support pupils with Visual Impairment within the mainstream school. There are currently two pupils who require enhanced support for their VI needs.

ESTYN conclude, 'Since there are currently no pupils attending the LSC, nor any planned to attend in the 2024-2025 academic year, there can be no adverse impact on standards, well-being, teaching, care, support and guidance or leadership by closing the unit'.

The full Estyn response is included as Appendix 2.

### **Next Steps**

If approved, the next stage of the process is to publish a statutory notice outlining the proposal. This would need to be published for a period of 28 days and formal written objections would be invited during this time.

If objections are received, an objection report will be published summarising the objections and the Council's response to those objections. The Council's Cabinet will need to consider the proposal in light of objections received when making its decision on whether the proposal is to be implemented.

## APPENDIX 1

### List of Consultees:

<b>List of Consultees</b>	
Cefn Saeson Comprehensive School Parents / carers Staff Governing Body Wider School Community	NAASH (Secondary Schools Forum)
	LLAN (Primary Schools Forum)
	Bordering authorities – Swansea/ Bridgend/ Carmarthenshire/ Powys/ RCT
All other NPT schools	Neath Town Council
NPT Elected Members	WG Schools Management Division
Diocesan Directors of Education - Diocese of Menevia, Swansa - Diocese of Llandaff, Vale of Glamorgan	MP and MS For Neath
Trade Unions	Regional Members of the Senedd
Estyn	ALN Partners-
Regional Education Consortium (ERW)	Children and Young Person Partnership (inc. Early Years Development and Childcare)
NPTCBC Integrated Transport Unit	Police and Crime Commissioner
Communities First Partnership	NPTC Officers



### **Estyn's response to the proposal by Neath Port Talbot to close the Learning Support Centre for pupils with Visual Impairment at Cefn Saeson Comprehensive School.**

#### **Introduction**

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

#### **Conclusion**

The proposals are likely to maintain or improve the standard of education provision in the area.

#### **Description and benefits**

The local authority has given a clear rationale for the proposal. Essentially, the learning support centre (LSC) for pupils with visual impairment has two planned places and neither of these have been taken up since 2021-2022. As a result, there are no teaching or support staff allocated to the unit. There are 11 pupils with visual impairment in secondary education in Neath Port Talbot (NPT) but by choice these pupils attend their local schools with support from the visual impairment team rather than attending the LSC.

The consultation document sets out a clear description of the proposal to close the unit, the projected timetable for statutory procedures and the implementation of the proposals from September 2025. There are only two options available: to retain or close the LSC. The local authority explains fairly the benefits for pupils with visual impairment of attending their local schools and the financial saving from closing the unit which would be repurposed to support areas of greater need, notably provision for pupils with autistic spectrum disorder and social, emotional and behavioural difficulties.

Given that there are no pupils currently using the LSC, there are unlikely to be any adverse impacts of the proposal on pupils, parents or staff. What isn't clear within the consultation document is what will happen to the space the unit currently comprises within Cefn Saeson Comprehensive School. The LSC is additional to the capacity of the school and so its closure is likely to mean a slight increase in the school's overall capacity. The school is projected to have about 63 surplus spaces by 2029. However, since the unit has only two pupils allocated to it, the extra space is likely to have a very small impact on the school's overall capacity.

The local authority sets out clearly within the consultation document that its preferred method of supporting pupils with visual impairment is in their local schools using advice, guidance and professional learning provided by the visual impairment team. This support is in Welsh or English depending on the language choice of the pupils. As such, there is no detriment to the provision that is currently available for these pupils.

In 2023-2024, the LSC cost £33,928 and the plan is that future funding will be used to support areas of greater need within the Inclusion service. It isn't clear from the consultation document what the funding from September 2022 until April 2025 has been used for while there have been no pupils within the LSC. It also isn't clear what will happen to the funding for the period April 2025 – August 2025 before the unit closes in September 2025.

### **Educational aspects of the proposal**

Pupils with visual impairment and their parents in NPT are choosing to attend their local schools with support from the visual impairment team rather than attending the LSC at Cefn Saeson. The consultation document suggests that they are making these choices primarily to maintain friendships and have better access to local activities and facilities. Since there are currently no pupils attending the LSC, nor any planned to attend in the 2024-2025 academic year, there can be no adverse impact on standards, well-being, teaching, care, support and guidance or leadership by closing the unit. There is also no primary unit for pupils with visual impairment and so no group of pupils expected to transfer into the LSC in the coming years.

The consultation document makes appropriate reference to the most recent inspection report for Cefn Saeson Comprehensive School. It is clear how pupils at the school will be consulted on the proposal to close the LSC. However, there is no plan to consult with pupils with visual impairment who are attending other schools, which might be a helpful addition to the programme of consultations.