

Appendix C: 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

Version	Author	Job title	Date
Version 1	Kate Windsor-Brown	Transformation Coordinator	28/08/24
Version 2	Kate Windsor-Brown	Transformation Coordinator	23/12/25

1. Details of the initiative

	Title of the Initiative: PROPOSAL TO CLOSE THE LEARNING SUPPORT CENTRE FOR PUPILS WITH VISUAL IMPAIRMENT AT CEFN SAESON COMPREHENSIVE SCHOOL.
1a	Service Area: Strategic School Improvement Programme
1	Directorate: ELLL
1	Summary of the initiative: Closure of specialist provision for pupils with Visual Impairment (VI) at Cefn Saeson Comprehensive School

1	<p>Is this a ‘strategic decision’? 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</p>
1	<p>Who will be directly affected by this initiative? Service Users, staff and members of the community.</p>
1	<p>When and how were people consulted? 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.</p>
1	<p>What were the outcomes of the consultation? Information to be provided following consultation period and IIA to be updated at this stage</p>

2. Evidence

What evidence was used in assessing the initiative?

A great deal of information is available with relation to the population within Neath Port Talbot. This can be accessed from the following sources.

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016
- 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			<p>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> <p>This proposal seeks to close a specialist learning support centre for secondary aged children with VI. Current data indicates that there are currently 0 pupils attending the 2 place LSC in Cefn Saeson Comprehensive 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 VI 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 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 which further details how to include pupils with a visual impairment.</p> <p>It is therefore expected that this proposal will have an overall positive impact on this aspect.</p>

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 VI. Data indicates There are currently 38 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.</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. <i>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.</i></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 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</p>

			<p>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 VI 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 NPT 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			<p>x</p> <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			<p>x</p> <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			<p>x</p> <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			<p>x</p> <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. 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>There is no data to suggest either sex are more likely to experience VI, and in NPT currently there are an equal number of boys and girls with VI.</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 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 VI are supported within mainstream schools in line with individual development plans and the 2 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 VI 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 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 VI within mainstream classes does not only support VI pupils but will also aim to raise awareness with other mainstream pupils and staff about VI, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation. Pupils with VI 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</i></p>

				<i>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>
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 VI within Cefn Saeson Comprehensive School. Support for pupils with VI 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 VI is a priority when promoting more positive outcomes for this group. Provision to support the confidence and emotional well-being of learners with VI in 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 VI within mainstream classes does not only support VI pupils but will also aim to raise awareness with other mainstream pupils and staff about VI, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation.
- Raising awareness and promoting greater understanding of VI 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 VI 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 VI at Cefn Saeson Comprehensive 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 VI 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 VI within all mainstream schools. Support will be provided regardless of any specific socio-economic disadvantage.</p>

	There are no staff members employed within the LSC for pupils with VI in Cefn Saeson Comprehensive School, therefore no staff members will be affected by the closure of the provision.
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What action will be taken to reduce inequality of outcome
<ul style="list-style-type: none"> • Progress of pupils across NPT with an IDP identifying their need as VI will be monitored by the local authority to ensure that there are no negative impacts as a result of the implementation of this proposal. • Monitoring of the support available and of the improved awareness of VI in all mainstreams secondary schools will take place annually

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 VI 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 VI 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 VI at Cefn Saeson Comprehensive 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:				Cefn Saeson Comprehensive School Learning Support Centre for pupils with VI is an English-medium provision. Following the proposed implementation of this proposal, specialist support for pupils with VI 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-
– people's opportunities to use the Welsh language				
– treating the Welsh and English languages equally				

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

This proposal, if implemented would be closely monitored in regards 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 VI 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	Neath Port Talbot County Borough Council (NPTCBC) has a legal duty to maintain and enhance biodiversity, and in so doing, promote the resilience of

<p>To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.</p>			<p>x</p>	<p>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>
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<p>What action will be taken to improve positive or mitigate negative impacts?</p>
<ul style="list-style-type: none"> Any future impacts will be monitored closely following the proposed closure of the LSC

8. Well-being of Future Generations

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

<p>Ways of Working</p>	<p>Details</p>
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<p>i. Long term – 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>Cefn Saeson Comprehensive School is currently receiving additional funding to manage the 2 planned places within the LSC for pupils with visual impairment with 0 pupils attending. The provision is funded from the delegated schools budget and the school receives funding for which equates to approximately £33,928 per annum.</p> <p>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. Prevention – preventing problems occurring or getting worse</p>	<p>Closing the specialist provision and continuing to support pupils with VI 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 (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.</p>
<p>iii. Collaboration – 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>
<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>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.</p>
<p>v. Integration – making connections to maximise contribution to:</p>	<p>This proposal has a positive contribution to the Council’s well-being objectives as it aims to ensure that pupils with VI are supported and are able to make progress within mainstream classes and settings.</p>

Council's well-being objectives	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.
public bodies objectives	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 VI 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
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Equalities	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.
Socio Economic Disadvantage	The proposal will have both neutral and positive impacts on socio economic disadvantage.
Community Cohesion/ Social Exclusion/Poverty	The proposal will have a neutral impact on community cohesion but should have a positive impact on social exclusion and poverty
Welsh	The proposal will have a positive impact on the Welsh language
Biodiversity	The establishment of the provision has no impact on biodiversity
Well-being of Future Generations	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 VI 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 VI 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		23.12.24
Signed off by	Rhiannon Crowhurst	Head of Service/Director		23.12.24