

Education, Leisure & Lifelong Learning Service Strategic School Improvement Programme

> PROPOSAL TO CLOSE THE LEARNING SUPPORT CENTRE FOR PUPILS WITH SPECIFIC LITERACY DIFFICULTIES AT CWMTAWE COMMUNITY SCHOOL, FFORDD PARC YNYSDERW, PONTARDAWE, SWANSEA, SA8 4EG

CONSULTATION REPORT



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CONSULTATION REPORT

Responses from formal consultation on the proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School, Ffordd Parc Ynysderw, Pontardawe, Swansea, SA8 4EG.

Introduction

The Council has consulted with interested parties on its proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School. If implemented, this proposal will take effect on September 1st 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 SpLD at Cwmtawe Community School, Ffordd Parc Ynysderw, Pontardawe, Swansea, SA8 4EG with effect from 1st September 2025.

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.

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).

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.

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.

The Learning Needs Code for Wales also states:

"The Welsh Government considers that an inclusive education, where all pupils access common opportunities in ways relevant to their needs, and which ensures that they fully belong to the school community, is of benefit to all... The ALN system relies on the knowledge and experience of teaching staff to identify ways of providing appropriate access to the curriculum for every child and young person. Meeting the needs of learners with ALN ought to be part of a whole school or institution approach to school or institution improvement. The key to this lies in the teaching staff's knowledge of each child and young person's skills and abilities. Consequently, improvements in the teaching and learning of children and young people with ALN cannot be isolated from improvements in the teaching and learning for children and young people across a school or FEI as a whole."

At present, there are 0 pupils at the Learning Support Centre for pupils with SpLD at Cwmtawe Community School.

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 Cwmtawe Community School Learning Support Centre for pupils with SpLD 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.

<u>Option 2</u> – Close the Cwmtawe Community School Learning Support Centre for pupils with dyslexia and continue to provide additional support in mainstream settings

Continue to provide specialist support for pupils with SpLD 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 (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.

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 funding will be repurposed to provide additional provision in areas where we have identified the greatest need. Currently there are no pupils accessing the funded Cwmtawe Community School Learning Support Centre for pupils with SpLD as all secondary age pupils with IDPs for SpLD 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 SpLD 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 2nd October 2024, the Council's Cabinet determined to consult on the proposal to close the specialist learning support centre (LSC) provision for secondary age pupils with Specific Literacy Difficulties (SpLD) at Cwmtawe Community School. The consultation period ran from 5th November 2024 to 16th 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

Two written responses from Pontardawe Town Council and ESTYN were received on this proposal.

The Pontardawe Town Council response received stated:

"Pontardawe Town Council does not feel strongly one way or another regarding the proposal."

Estyn response to the proposal:

Estyn overall response states that this proposal is likely to, at least, maintain the standard of education provision in the area. ESTYN note, 'The council has presented a suitable rationale outlining the reasons for the proposal'.

Additionally, ESTYN note, 'The council appropriately outlines its current approach and research in relation to meeting the needs of pupils with SpLD. It highlights that schools in Neath Port Talbot can successfully support pupils with an IDP in mainstream classes'.

The following is also noted, 'Overall, the proposer identifies clearly and fairly the expected benefits and disadvantages of closing the LSC when compared with the status quo as well as how they will manage any risk. One of the main advantages is the improved use of public money as the funding will be repurposed to provide additional provision in areas where they have identified the greatest need. It provides acceptable reasons as to why they have discounted maintaining the status quo'.

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:

List of Consultees	
Cwmtawe Community School	NAASH (Secondary Schools Forum
Parents / carers	LLAN (Primary Schools Forum)
Staff	Bordering authorities – Swansea/
Governing Body	Bridgend/ Carmarthenshire/ Powys/
Wider School Community	RCT
All other NPT schools	Pontardawe Town Council
	Cilybebyll Community Council
NPT Elected Members	WG Schools Management Division
Diocesan Directors of Education	MP and MS
- Diocese of Menevia, Swansa	For Neath
 Diocese of Llandaff, Vale of 	
Glamorgan	
Trade Unions	Regional Members of the Senedd
Estyn	ALN Partners- SNAP, Action for
	Children, Child and Adult Mental Health
	Services (CAMHS), Consultant Community Paediatrician, The Children's Centre NPT
	Hospital (Therapeutic Services), National
	Autistic Society, NPT Special Needs
	Support Group
Regional Education Consortium	Children and Young Person
(ERW)	Partnership (inc.Early Years
	Development and Childcare)
NPTCBC Integrated Transport Unit	Police and Crime Commissioner
Communities First Partnership	NPTC Officers

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Estyn's response on the proposal to close the Learning Support Centre at Cwmtawe Community 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.

Summary/ Conclusion

The proposal is by Neath Port Talbot County Brough Council and is to close the Learning Support Centre for pupils with specific literacy difficulties at Cwmtawe Community School.

It is Estyn's view that this proposal is likely to, at least, maintain the standard of education provision in the area.

Description and benefits

The council has presented a suitable rationale outlining the reasons for the proposal. As part of its wider work, the Council is currently reviewing the number and type of schools in the region to assess whether best use is made of resources and provisions. This evaluation of suitable provision will include assessing settings for those pupils with additional learning needs. The council states that as part of the Strategic School Improvement Programme (SSIP) it will re-organise provision for specialist support, skills, and expertise available within the County Borough.

In its assessment of current provision and demand for specialist provision for pupils with Additional Learning Needs (ALN), the proposer provides a detailed summary. As part of its own tracking, the council has indicated the greatest areas of need and demand on specialist provision in the next three years. At primary level this is Autism Spectrum Disorder (ASD), in addition to Severe and Profound Multiple Learning Difficulties (SLD/PMLD). At secondary level this is ASD, Moderate Learning Difficulties (MLD) and Social Emotional and Behavioural Difficulties (SEBD). In response to ASD need, the council has provided additional places over the past 5 years.

The council appropriately outlines its current approach and research in relation to meeting the needs of pupils with SpLD. It highlights that schools in Neath Port Talbot can successfully support pupils with an IDP in mainstream classes. There are currently ten pupils with SpLD across its schools who hold a Local Authority Maintained IDP. All are educated and supported within mainstream schools.

In 2020/2021, there were six pupils at the Learning Support Centre (LSC). Currently no statutory aged pupils attend the facility in the academic year 2024/ 2025. There are also no teachers or support staff currently employed within the centre.

The council appropriately concludes that it needs to adapt its current additional provision to provide sufficient support for areas identified as the greatest need. It also suggests that specialist support will be provided in mainstream schools including Welsh-medium schools, in line with the Additional Learning Needs Code for Wales. This appears to be a fair and reasonable plan based on the declining numbers at the LSC. If approved, the proposal of closing the LSC provision for SpLD will take effect from September 2025.

Overall, the proposer identifies clearly and fairly the expected benefits and disadvantages of closing the LSC when compared with the status quo as well as how they will manage any risk. One of the main advantages is the improved use of public money as the funding will be repurposed to provide additional provision in areas where they have identified the greatest need. It provides acceptable reasons as to why they have discounted maintaining the status quo. For example, currently no pupils attend the provision. The council has completed a risk assessment and suitably highlighted the potential areas of risks in implementing the proposal.

The council has considered the impact of the proposal on transport arrangements. Under the council's transport policy, free transport is provided for primary school pupils who reside over two miles and secondary over three from their nearest appropriate school. The proposal indicates that all pupils with IDPs will receive targeted support within their catchment school, thus reducing the need for additional travel costs to alternative settings. This appears to be a fair assessment.

The council has suitably demonstrated the impact of current and future position of Cwmtawe Community School in terms of surplus places. Full-time pupil numbers have declined from 1228 in 2019/20 to 1115 in 2023/2024. Data also suggests that numbers will decrease further over the next five years. The proposer indicates that the closure of the LSC will not have a negative effect on the school's full time pupil capacity.

The proposal takes sufficient account of the impact of the proposals on Welsh medium provision within the local authority and the extent to which the proposal supports the targets in the local authority's Welsh in Education Strategic Plan (WESP). The council has undertaken an impact assessment on the Welsh language and states that the proposals will result in Welsh-medium provision being equitable

to English-medium provision. For example, following implementation, specialist support for pupils with SpLD will be provided in Welsh-medium schools in line with individual pupil IDPs.

The council has appropriately considered the financial implications of the proposal. In 2023-2024, Cwmtawe Community School LSC received an additional £17,176 for one pupil. As the proposal seeks to close the LSC, the school's budget would be adjusted and funding repurposed.

The local authority has provided a Community Impact Assessment as part of this proposal.

Educational aspects of the proposal

The council appears to have considered the quality of outcomes, provision and leadership and management at the school. They have included brief highlights of the outcomes of their last Estyn inspection report in 2018, returning good and excellent judgements in all areas. While the section provides a useful insight, it does not include further up-to-date evaluations of the school's effectiveness. For example, the proposer has not included the local authority's view on the current quality of leadership and management of the school.

The council states that as there has been a significant decline in numbers attending the LSC, the impact on pupils with ALN and their parents will be limited. It provides a detailed summary of its support programme for children and young people with SpLD within mainstream schools. This includes the involvement of specialist staff, casework, and high-quality training. The proposer carefully stresses the need to build capacity and knowledge in the system in order to continue to effectively support pupils with SpLD.

The council has undertaken an impact equality assessment to consider the impact of the proposal on the protected characteristics. As a result of this assessment, it has concluded that the proposal is unlikely to have any impact on the protected characteristics.

The proposal will close an ALN provision in a mainstream 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 statutory publication of the proposal. As part of the proposal, the council appears to take due consideration of the factors set out in the 'School Organisation Code' (para. 1.14, page 16) in relation to proposals affecting special schools and specialist resource bases in mainstream schools.