

## 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
Final	RC	SSIP Programme Manager	10.3.20

### 1. Details of the initiative

	<b>Title of the Initiative:</b>
<b>1a</b>	<b>Service Area:</b> Strategic School Improvement Programme
<b>1b</b>	<b>Directorate: ELLLS</b>
<b>1c</b>	<b>Summary of the initiative:</b> Establishment of specialist provision for secondary age pupils with Autistic Spectrum Disorder (ASD) at Dwr Y Felin Comprehensive School
<b>1d</b>	<b>Who will be directly affected by this initiative?</b> Pupils, parents, staff, governors and community of Dwr Y Felin Comprehensive school; pupils with ASD, schools and parents across Neath Port Talbot
<b>1e</b>	<b>When and how were people consulted?</b> Formal consultation took place between September 23 <sup>rd</sup> and November 5 <sup>th</sup> 2019. A consultation document was published on Neath Port Talbot Council website, and sent directly to relevant consultees. Officers met with pupil representatives of Dwr Y Felin Comprehensive School and information sharing meetings were held with the school community.

<b>1f</b>	<p><b>What were the outcomes of the consultation?</b></p> <p>All responses received were wholly positive and supported the proposal to establish specialist provision for secondary age pupils with Autistic Spectrum Disorder (ASD) at Dwr Y Felin Comprehensive School</p>
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## 2. Evidence

<p><b>What evidence was used in assessing the initiative?</b></p>
<p><b>Information gathered during consultation and consultation responses</b></p> <p><b>Local and National data including PLASC, and Additional Learning Needs(ALN) data</b></p> <p><b>National Autistic Society research information, <i>Diverse Perspectives</i> (2014)</b></p>

## 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>Data indicates that there are currently 434 pupils with ASD in Neath Port Talbot, an increase of almost 47% since 2012. (PLASC Jan 2019).</p> <p>197 pupils with ASD attend secondary or middle schools, a 40% increase since 2012 (PLASC Jan 2019)</p> <p>Increasing numbers of pupils with ASD has led to pressure on current provisions and this proposal will seek to address the needs of these pupils and future pupils identified as having ASD by providing an additional provision for secondary age pupils It will increase the number of specialist places available within the county borough for pupils with ASD, ensuring greater numbers of pupils are able to access specialist support.</p> <p>Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria would apply.</p>

			<p>Pupils at the proposed provision will benefit from being taught by specialist staff, experienced in working with pupils with ASD needs.</p> <p>Consultation responses have indicated that a provision of this kind is welcomed by pupils, parents, health and education professionals and schools.</p> <p>The provision will impact on secondary aged pupils of Dwr y Felin Comprehensive School as pupils admitted to the provision will become part of the school roll, taking a full part in the life and activities of the school as appropriate. Consultation responses indicate that pupils, staff and Governors welcome this provision and feel it will enhance an already inclusive school.</p> <p>It is also envisaged that the provision will be able to provide support and training for other mainstream primary schools across Neath Port Talbot, building skills, competencies, expertise and capacity of all staff working with children with ASD.</p> <p>The establishment of the ASD provision in Dwr y Felin Comprehensive school is therefore likely to have a positive impact on pupils aged 11-16.</p>
Disability	x		<p>The Council's arrangements for education across the county borough include those children and young people with a disability. The proposed provision will specifically provide education for pupils with an additional learning need, therefore the impact on these pupils is likely to be high.</p> <p>Data indicates that there are currently 434 pupils with ASD in Neath Port Talbot, an increase of almost 47% since 2012. (PLASC Jan 2019)</p> <p>This proposal will seek to address the needs of these pupils and future pupils identified as having ASD by providing a provision designed to meet their needs.</p> <p>As a self-contained provision, the facility will not have a direct impact on the ALN provision of Dwr y Felin Comprehensive School where pupils with additional learning needs, including children with statements of special educational needs, are supported in a mainstream setting with appropriate funding for this purpose.</p> <p>However, the specialist knowledge and skills-set of the staff employed to work at the provision will be available to share with mainstream staff and, as such, will indirectly benefit ALN provision at the school.</p> <p>It is also envisaged that the provision will be able to provide support and training for other mainstream primary schools across Neath Port Talbot, building skills, competencies, expertise and capacity of all staff working with children with ASD.</p>

			<p>This proposal therefore will have a positive impact on pupils with ASD not just within the provision but in Dwr Y Felin Comprehensive school mainstream classes and in other schools across Neath Port Talbot where support and training is accessed by staff.</p> <p>The new facility will be fully compliant in terms of requirements for disabled users. This will potentially have a positive impact on pupils as yet unknown who may have an additional disability.</p> <p>During consultation pupils at Dwr Y Felin Comprehensive raised concerns regarding noise for learners in the provision, due to the proposed location below the music classrooms. It was recognised that some ASD pupils will be more affected by noise than others and this may disadvantage them. This has been noted and extra care will be taken to ensure that this is considered when planning and developing the building works.</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 2017)</p> <p>The establishment of an ASD provision in Dwr y Felin Comprehensive school will have a positive impact on disability.</p>
Gender reassignment		x	This is not a criterion that will be impacted upon by this proposal
Marriage & civil partnership		x	This is not a criterion that will be impacted upon by this proposal
Pregnancy and maternity		x	This is not a criterion that will be impacted upon by this proposal
Race	x		PLASC 2019 data indicates that 96% of the pupil population with a statement of special educational need (SEN) identify as White British and just 6% of pupils with a statement for ASD are Black, Asian or minority ethnic (BAME).

			<p>In 2014 the National Autistic Society published a report entitled <i>Diverse Perspectives</i> which detailed research undertaken on the experiences of BAME families with children with ASD. It concluded that difficulties were primarily related to their child's autism, not their ethnicity, however many also faced additional challenges that appear to reflect shared experiences within BAME communities. These include:</p> <ul style="list-style-type: none"> <li>-Challenges getting a diagnosis:</li> <li>-Barriers to accessing support services</li> <li>-Communication problems with professionals</li> <li>-Awareness and understanding of autism within communities</li> <li>-Denial and isolation, alongside feelings of blame and shame: many said that these issues could lead to parents, carers and siblings missing out on support and becoming socially isolated.</li> </ul> <p>Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria would apply. Pupils of any race would be eligible for admission to the provision, and once admitted pupils would have equal opportunities to access the support available. The proposal would therefore have a potentially positive impact on this group, by enabling families to have better access to support and services.</p>
Religion or belief	x		<p>Pupils and staff of any religion or belief would be eligible for admission to the provision and the Council's educational arrangements will meet the needs of pupils or staff members of different religions or with different beliefs.</p> <p>Research (<i>Diverse Perspectives</i>, 2014) has shown that some ASD pupils from BAME can be disadvantaged due to their culture with some participants emphasising that their faith gave them strength, while others reporting a lack of support from faith groups and at places of worship.</p> <p>This proposal would seek to improve opportunities for pupils with ASD as specialist staff appointed will be able to better understand and support pupils and families, who may be experiencing particular difficulties due to religion or belief.</p>
Sex	x		<p>Current data (Plasc Jan 2019) indicates 242 pupils with a statement for ASD, of which 198 are boys and 44 are girls. This would suggest that the proposed provision may have greater numbers of male than female pupils attending.</p>

			<p>Studies have shown that behavioural characteristics of ASD females can vary greatly compared to those of autistic males. In general, ASD girls are often isolated or have fewer friends than other girls in their peer group, particularly in their teenage years, and can struggle more than usual with adolescence. This can lead to depression and anxiety. Due to greater numbers of boys than girls in need of support this could mean that girls accessing the provision are in a minority, and so could increase feelings of isolation and anxiety.</p> <p>As the proposal aims to establish an ASD provision in a mainstream school it should provide greater opportunities for female ASD pupils to socialise and make friends with pupils attending mainstream classes, thus ensuring that friendship groups become larger than just the pupils attending the provision. Due to the support available from the experienced staff planned for the provision, and the fact that Dwr y Felin Comprehensive is recognised to be an inclusive and caring school community where children and young people with differing needs and abilities are all supported to thrive, this is likely to have a positive impact on female pupils attending the provision.</p> <p>The benefits of the provision being based in a mainstream, inclusive school is also likely to benefit male pupils, ensuring that their peer groups are also extended beyond those pupils attending the provision.</p>
Sexual orientation	x		<p>Research demonstrates an increased prevalence of autistic children and young people who are gender questioning. This proposal could have a positive impact by ensuring support can be accessed for those pupils who need it from the specialist staff employed in the provision, who will already know the pupils well and be better placed to advise and support them.</p>

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

- Implementing the proposal and establishing an ASD provision for secondary aged pupils in Dwr y Felin Comprehensive school will ensure that the positive impacts on the protected characteristics identified are realised
- Recruitment of specialist and experienced staff will be essential with extra training provided as necessary

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			Pupils with an additional learning need could be at risk of discrimination, harassment and victimisation by others. The establishment of an ASD provision at Dwr y Felin Comprehensive school will not only support pupils attending but will also aim to raise awareness with mainstream pupils and staff about ASD, promoting greater acceptance and understanding and eliminating discrimination, harassment and victimisation
To advance equality of opportunity between different groups	x			<p>The establishment of the provision at Dwr y Felin Comprehensive school would address the increased numbers of pupils aged 11-16 who have a statement of ASD needing specialist support. These pupils would therefore benefit most from this provision. Admission to the provision would be via a special admission panel of the Council and specific entry and exit criteria would apply. All pupils with a statement of ASD would be eligible for admission to the provision from any of the protected groups.</p> <p>As the provision is being established in a mainstream school it is expected that pupils who attend the provision will also have the opportunity to experience and take part in a wide range of activities open to all pupils, thus providing greater equality of opportunity.</p>
To foster good relations between different groups	X			Raising awareness and promoting greater understanding of ASD pupils will help to foster good relationships between pupils attending the mainstream school and those attending the provision. Work undertaken with other mainstream schools by staff employed at the provision will also help to promote understanding and awareness of ASD and foster good relationships.

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

- Implementing the proposal and establishing an ASD provision for secondary aged pupils in Dwr y Felin Comprehensive school will ensure that the positive impacts identified are realised
- Dwr y Felin Comprehensive school staff will raise awareness of the purpose of the provision , and staff and pupils will support pupils in the provision with integration and further promote inclusion throughout the school
- Outreach work with other mainstream school will be undertaken following the establishment of the provision to further promote awareness of ASD

**4. Community Cohesion/Social Exclusion/Poverty**

	+	-	+/-	Why will it have this impact?
Community Cohesion			x	It is not expected that the establishment of the ASD provision will impact on community cohesion
Social Exclusion	x			The establishment of the provision will aim to support those pupils with ASD who may have difficulty participating fully in society, and will give them the opportunity to experience similar life experiences to mainstream pupils
Poverty	x			The provision will aim to ensure that pupils are not at risk of participation poverty by providing opportunities for them to be included in activities experienced by their mainstream peers.

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

- Implementing the proposal and establishing an ASD provision for secondary aged pupils in Dwr y Felin Comprehensive school will ensure that the positive impacts identified are realised
- Staff recruitment will ensure that experienced specialist staff are appointed who are able to provide the best opportunities for pupils
- Dwr y Felin Comprehensive school staff will raise awareness of the purpose of the provision , and staff and pupils will support pupils in the provision with integration and further promote inclusion throughout the school

**5. Welsh**

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:				Although the provision is planned to be established in an English medium secondary school, staff who are able to speak Welsh will be available to support pupils who transition from a WM school or who speak Welsh as their first language.  Pupils attending the provision from a WM school or who speak Welsh as their first language will benefit from the specialised support available to them.
- people's opportunities to use the Welsh language	x			
- treating the Welsh and English languages equally	x			

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

- Recruitment of staff who are able to speak Welsh would be deemed desirable for the provision
- Support for Learning and Inclusion available from Welsh speaking staff

## 6. 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	The establishment of an ASD provision in disused rooms at Dwr y Felin will have no adverse impact on biodiversity or Ecosystem resilience.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	

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

## 7. Well-being of Future Generations

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

Ways of Working	Details
i. <b>Long term</b> – looking at least 10 years (and up to 25 years) ahead	Data indicates that the number of pupils with ASD who require support is increasing. This provision will support the Councils wellbeing objective 1 – ‘to improve the wellbeing of children and young people’ through establishing a specialist provision to support pupils currently identified as well as those who will be identified in the future.

	<p>The cost of providing education outside the County Borough for pupils with specialist needs is high, and can amount to circa. £80k per pupil per year. This annually presents a significant demand on the Council's education budget. Meeting the special needs education of pupils in local settings, i.e. within the County Borough, avoids having to secure expensive out-of-county provision, at the present time and in the future</p>
<p>ii. <b>Prevention</b> – preventing problems occurring or getting worse</p>	<p>By establishing a specialist provision the Council will be providing support and specialist teaching for children and young people with ASD in Neath Port Talbot. This will avoid costly out of county placements thus reducing the demand on the Council's education budget. It will help to prevent absenteeism and possibly exclusion rates as pupils will be educated in a setting that meets their needs which should improve their wellbeing and desire to attend school. It will also ensure that pupils are able to access the support they need to make progress, ensuring that they are able to gain qualifications and life skills for the future.</p>
<p>iii. <b>Collaboration</b> – working with other services internal or external</p>	<p>A range of Council services are involved in establishing the provision should the proposal be approved, including Support for Learning, Education Development Service, Environment Department, Access Managed Services and Transport Services</p>
<p>iv. <b>Involvement</b> – involving people, ensuring they reflect the diversity of the population</p>	<p>The formal consultation process sought the views of the following groups  Dwr y Felin Comprehensive School: Pupils, Parents/carers, Staff, Governing Body, Wider School Community  All other NPT schools  NPT Elected Members  Neath Town Council  NAASH (Secondary Schools Forum)  LLAN (Primary Schools Forum)  Bordering authorities – Swansea/ Bridgend/ Carmarthenshire/ Powys/ RCT  WG Schools Management Division  Diocesan Directors of Education- Diocese of Menevia, Swansea, Diocese of Llandaff, Vale of Glamorgan  MP (for Aberafan)–Stephen Kinnock,  MP (for Neath) – Christina Rees  AM (for Aberafan) – David Rees  AM (for Neath) – Jeremy Miles  Trade Unions  Regional Assembly Members</p>

	Estyn Local Members 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 Group NPTCBC Officers SEN Partners
<b>v. Integration – making connections to maximise contribution to:</b>	The proposal to establish an ASD provision in Dwr y Felin Comprehensive school has a positive contribution to the Council's well-being objectives as it aims to ensure that pupils with ASD are supported and are able to make progress
<b>Council's well-being objectives</b>	To improve the wellbeing of children and young people
<b>Other public bodies objectives</b>	Promote wellbeing through and in the workplace

## 8. 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.

Having considered the views expressed by interested parties, the Council has determined to proceed with its plan and subsequently published a statutory proposal on 7<sup>th</sup> January 2020 for a period of 28 days, known as the 'objection period', allowing for further written responses. No objections were received during this time.

If the proposal is implemented then Dwr y Felin Comprehensive school staff will monitor the progress and wellbeing of pupils in the provision to ensure that identified positive impacts are being implemented.

Monitoring will take place on a regular basis by Support for Learning and Inclusion officers, EDS officers and outside bodies including Estyn.

## 9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
<b>Equalities</b>	The establishment of the provision will have a positive impact on age, disability, sex, race, religion or belief and sexual orientation. It will have a neutral impact on gender reassignment, marriage and civil partnership and pregnancy and maternity.
<b>Community Cohesion/ Social Exclusion/Poverty</b>	The establishment of the provision will have no effect on community cohesion, but should have a positive impact on social exclusion and poverty
<b>Welsh</b>	Staff who are able to speak Welsh will be available to support pupils who transition from a WM school or who speak Welsh as their first language. Pupils attending the provision from a WM school or who speak Welsh as their first language will benefit from the specialised support available to them.
<b>Biodiversity</b>	The establishment of the provision has no impact on biodiversity
<b>Well-being of Future Generations</b>	This proposal directly contributes to the Council's wellbeing objective 'to improve the wellbeing of children and young people'

### Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised
- **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

The establishment of an ASD provision for secondary aged pupils in Dwr Y Felin Comprehensive School will provide vital support and specialist teaching for pupils with ASD. It will support ALN reform and ensure that the Council is able to fulfil its legal obligations to meet the needs of pupils with ALN.

It will have positive impacts on age, disability, race, religion/belief, sex and sexual orientation and will assist the Council's ability to meet the Public Sector Equality Duty. Additionally it will have a positive impact on social exclusion and poverty, and a positive impact on opportunities to use the Welsh language and in treating Welsh and English equally.

The Wellbeing of Future generations has been considered and the establishment of an ASD provision directly impacts on the Council's wellbeing objective –'to improve the wellbeing of children and young people'.

## 10. 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?
Recruitment of staff	Inclusion services and Dwr y Felin Comprehensive School	By April 2020	Suitably qualified and experienced staff appointed
Building works undertaken	SSIP/Environment	By summer 2020	Work completed and ready for occupation

## 11. Sign off

	Name	Position	Signature	Date
Completed by	Rhiannon Crowhurst	SSIP Programme Manager		10.3.20
Signed off by	Andrew Thomas	Head of Service/Director		10.3.20