Damien McCann, Public Document Pack

T: 01495 355001 E: committee.services@blaenau-gwent.gov.uk



Our Ref./Ein Cyf. Your Ref./Eich Cyf. Contact:/Cysylltwch â:

THIS IS A MEETING WHICH THE PUBLIC ARE ENTITLED TO ATTEND

Dydd Mercher, 14 Mehefin 2023 Dydd Mercher, 14 Mehefin 2023

Dear Sir/Madam

CABINET

A meeting of the Cabinet will be held in via MS Teams (if you wish to view this meeting please contact deb.jone@blaenau-gwent.gov.uk) on Dydd Mercher, 21ain Mehefin, 2023 at 10.00 am.

Yours faithfully

Danuer MC Can

Damien McCann Interim Chief Executive

AGENDA

Pages

1. <u>CYFIEITHU AR Y PRYD</u>

Mae croeso i chi ddefnyddio'r Gymraeg yn y cyfarfod, mae angen o leiaf 3 diwrnod gwaith o rybudd os dymunwch wneud hynny. Darperir gwasanaeth cyfieithu ar y pryd os gwneir cais am hynny.

2. <u>YMDDIHEURIADAU</u>

Derbyn unrhyw ymddiheuriadau am absenoldeb.

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg a Saesneg a byddwn yn cyfathrebu gyda chi yn eich dewis iaith, dim ond i chi rhoi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn creu unrhyw oedi. The Council welcomes correspondence in Welsh and English and we will communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to any delay.

Page

General Offices Steelworks Road Tyllwyn, Ebbw Vale NP23 6DN Swyddfeydd Cyffredinol Heol Gwaith Dur Tŷ Llwyn, Glyn Ebwy NP23 6DN

3. DATGANIADAU BUDDIANT A GODDEFEBAU

Derbyn unrhyw ddatganiadau buddiant neu oddefebau.

PORTFFOLIO POBL AC ADDYSG

4.ADRODDIAD ALL-DRO – YMGYNGHORIAD AR
GAPASITI CANOLFANNAU ADNODDAU ADY3 - 96

Ystyried adroddiad y Cyfarwyddwr Corfforaethol Addysg.

To: S. Thomas Councillor H. Cunningham J. C. Morgan H. Trollope Councillor S. Edmunds

> All other Members (for information) Interim Chief Executive Chief Officers

Agenda Item 4

Cabinet and Council only Date signed off by the Monitoring Officer: 13.06.23 Date signed off by the Section 151 Officer: 14.06.23

Committee:	Cabinet
Date of meeting:	21 st June 2023
Report Subject:	Outturn Report - Consultation on ALN Resource Base Capacity
Portfolio Holder:	Cllr Sue Edmunds, Cabinet Member for Education
Report Submitted by:	Joanne Watts, Service Manager Education Transformation and Business Change

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Governance Audit Committee	Democratic Services Committee	Scrutiny Committee	Cabinet	Council	Other (please state)
						21.6.23		

1. **Purpose of the Report**

- 1.1 The purpose of the report is to provide a detailed overview of the statutory consultation undertaken by Education in relation to the proposal to increase the capacity of ALN Resource Bases. The report provides an overview of the consultation:
 - methodology;
 - process; and,
 - outcomes including key themes emerging from the responses received.
- 1.2 A determination is sought from Cabinet in line with the proposal to proceed to Statutory Notice consultation outcome.

2. Scope and Background

2.1 **Consultation Process and Methodology**

The Welsh Government School Organisation Code – second edition (2018), dictates that proposals **must** be published for the following elements of school reorganisation:

- 1. the opening of a maintained school (including a special school);
- 2. the closing of a maintained school (including a special school);
- 3. to make a regulated alteration to a maintained school; and,
- 4. to change the category of a maintained school.
- 2.2 Therefore, the proposal to increase the capacity for Additional Learning Needs (ALN) Resource Bases across the County Borough in both Primary and Secondary settings for Autism Spectrum Disorder (ASD) and Additional Learning Needs Resource Bases (ALNRB) pupils **must** be subject to a formal consultation.
- 2.3 The consultation was initiated and conducted via a formal consultation document and accompanying online survey (please refer to **Appendix 1** for the consultation document), which was fully compliant with the statutory

requirements set out within the aforementioned Code. The purpose of consultation was to establish the views and opinions of consultees in relation to the proposal, in order to inform the Council's political decision-making process, along with the next steps associated with the proposal.

- 2.4 In accordance with the Welsh Government School Organisation Code, the Authority is required to publish a consultation report (at least 2 weeks prior to the publication of statutory notice) which:
 - summarises the issues raised by consultees;
 - responds to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons;
 - sets out Estyn's response to the consultation in full; and,
 - responds to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.
- 2.5 Formal consultation commenced on Monday 24th April 2023, upon publication of the formal consultation document on the Council's website. The process then concluded on Tuesday 6th June 2023 at 5:00pm. Consultees were asked to provide their views, opinions and feedback via one or more of the following methods:
 - attending a drop in session;
 - completion of an on-line survey; and/or,
 - in writing via the 21st Century School's email address.
- 2.6 The Council targeted consultees as directed by the Welsh Government School Organisation Code (please refer to **Appendix 2** for a comprehensive list of consultees who were provided with the necessary documentation). Electronic letters and links to the consultation document were distributed along with a link to the online survey to:
 - all Blaenau Gwent schools to staff, parents and pupils;
 - all Governing Bodies of affected schools via the Education Achievement Service; and,
 - other consultees as detailed within Appendix 2.

In total, 0 formal responses were received via letter, there were 2 emails received and 71 survey responses received.

2.7 **Public Engagement Overview**

The Council opted to run 4 drop-in sessions over two weeks in Abertillery, Brynmawr, Ebbw Vale and Tredegar to engage with consultees. There were no telephone enquires pertaining to the consultation from consultees. Education held 2 pre-planned sessions with the JCC and People Scrutiny Committee. These sessions were attended by 33 consultees (for more information please refer to **Appendix 3**). During the aforementioned sessions, a series of questions were posed and addressed by Council officers, for a detailed overview of both the questions posed and Council responses, please note **Appendix 4**.

2.8 Written Response Overview

The Council received 2 responses in total via email, both supported the proposal, as presented in the consultation document and finally, the response from Estyn is of the opinion that this proposal is likely to at least maintain the standard of provision, with the possibility of improving access to provision in the short and medium term. Please see more information within section 2.19 below. Please refer to **Appendix 5** for the redacted correspondence log.

- 2.9 The Council received 71 survey responses in total, an overview of which can be found in **Appendix 6**. However, the data below provides an overview of the correspondence outcomes in terms of the level of support for the proposal:
 - Fully support the proposal **60 (84%)**
 - Partially support the proposal 9 (13%)
 - Do not support the proposal 2 (3%)
- 2.10 **42 (59%)** respondents provided additional comments relating to the proposal. There were **29 (41%)** participants choosing not to comment, however all 29 were in full support for the proposal. Out of all the respondents, the split in terms of representation for these consultees is detailed below:
 - 6 non-teaching staff
 - 8 Governors
 - 23 parents
 - 20 Teachers
 - 1 Pupil
 - 1 Local resident
 - 12 Other including
 - 1 Headteacher
 - o **3 TA's**
 - o 1 HTLA
 - o I Diocesan
 - 1 Inclusive Practice Service
 - o 1 ALNCo
 - 1 Retired Teacher
 - 1 Town Council

2.11 Social Media Engagement

The Corporate Communications team were able to establish social media interactions and engagement with consultation posts, a summary of which is detailed below:

A total of 8 Council posts (outbound) were made via Facebook, an assessment of which revealed:

- 8 posts
- 2 shares
- Facebook reach 3,675

Webpages:

- The ALN Consultation webpage reached: 565 views and the ALN There were 14 Views via Welsh-medium.
- 2.12 The Consultation news story reached: 136 views and there were 4 Welshmedium views.

2.13 Thematic Analysis

The Education Transformation team employed a thematic analysis methodology in assessing the views of the consultees. This method is one of the most common used in qualitative research and is utilised to identify patterns emergent throughout a dataset i.e. key themes such as language. The emergent themes and patterns are important to the questions posed, in highlighting the impact of the proposal, which in turn will support Cabinet to make an informed decision on how to proceed. This process is interpretive; however, interpretation risks are largely mitigated by the presentation of all responses received (please refer to **Appendices 5, 6** and **7** for an overview of all comments, views and responses).

The primary themes arising from the analysis of responses along with the frequency of each of the aforementioned themes is detailed in **Appendix 7.** The top 5 themes were:

- This proposal will meet demand, increase capacity for ALN and cater for children's needs in both primary and secondary provision with an implementation timeline. This also allows children to stay in mainstream schools. The offer of Welsh and English provision is encouraging. There is a diverse range of schools considered across the county borough including Faith Based provision - 33
- The capacity in existing provision is full and there is a lack of specialist provision in mainstream settings, these can fail children especially when full class sizes are being affected by children who desperately need the ALN provision, as there is not enough provision 12
- Accessing learning environments for ALN learners in the correct way with highly skilled staff and training opportunities is the right approach
 -7
- There is a need to consider early years settings for ALN in mainstream settings, as a result of Covid and increased diagnosis of children 6
- Adequate funding is required to support the delivery for ALN as there has previously been a lack of investment 6
- 2.14 The themes centred around the consultees reinforcing what they felt to be the most important considerations and aspects of the proposal for the Council to take forward.
- 2.15 During recent years, school organisation consultations have received a higher proportion of negative than positive responses. However, it is important to note that this consultation received a greater level of support

than challenge, with the primary challenge focusing on the need for sustained high quality provision.

2.16 Children & Young People's responses

The young person's version of the consultation document was shared with all School Councils via the Council's Policy and Partnerships team to ensure children and young people had the opportunity to engage in the consultation process. In order to support the engagement of both children and young people, virtual sessions were arranged with both the Youth Forum and the Grand School Council.

2.17 Youth Forum Responses:

- " I think this is amazing, it's giving all C & YP equal rights to education and I am so pleased this is going to happen so soon. I wish this had happened sooner as my good friend had to change schools for this support which had a huge impact on his friendships" (Deputy Youth Mayor)
- "I think it's amazing that C & YP with ASD or Autism don't have to travel, they can stay local and benefit by staying with their friends" (Youth Forum Member)
- "I am completely for this change especially the fact the C & YP from Faith or Welsh language schools being offered the same opportunities, I also echo everything the others have said" (Youth Mayor)

2.18 School Council Response

Unfortunately, the Grand School Council meeting that was scheduled for 17th May was postponed until June 15th which is after the closure of the consultation. Therefore, no comments were captured. Session were offered to all 10 affected School's School Councils.

2.19 ESTYN Response

A formal Estyn response was received during the consultation period and based on the consultation document. The full response is provided in **Appendix 5** (response no. 1). Estyn concluded that:

- 'this proposal is likely to at least maintain the standard of provision, with the possibility of improving access to provision in the short and medium term.'
- 'The Council has provided a clear rationale for the proposal.'
- 'Future projections, based on patterns in trends over time, show an increase in demand over the next few years. This proposed increase in capacity would meet the increase in numbers.'
- 'The Council also provides outline information about any capital investment to improve resources and adapt the current accommodation ... but there could be more detail explaining how the Council arrived at these estimates.'
- 'The projections give good consideration to any costs for providing for pupils out of county and, similarly, any income from accommodating

pupils from other counties. A forecast of transport costs has been provided appropriately.'

- 'The Council has provided sufficiently detailed descriptions of the proposals and the projected timetable for statutory procedures and implementing the proposal. However, it does not detail the precise actions that will be needed to meet the implementation, particularly when action is required in September 2023.'
- 'The council has identified the potential disadvantages and risks appropriately and it appears that is has outlined some appropriate mitigation measures.'
- 'The Council has given clear consideration to pupils' travel arrangements as a result of this proposal. It has committed to ensuring that all pupils have fair access to the home to school transport policy.'
- 'The Council has given suitable consideration to the effect of the proposal on standards; well-being and attitudes to learning; teaching and learning experiences; care, support and guidance; and leadership and management. It has come to the conclusion that the plan will continue to provide a high-quality learning environment for pupils and that standards will be maintained.' Estyn have provided some further considerations to strengthen this area, which will be key to formulating implementation planning moving forward. In particular implementation planning will need to 'provide sufficient detail about any specific work or support that the council will need to provide to the individual schools in the plan ... and steps should be outlined to mitigate any disruptions to 'pupils' ... learning and wellbeing during the transition'.
- Estyn have suggested that it would be beneficial for the Council to provide further details on 'quality assurance processes and any specific measures taken to address potential inequalities or challenges.'
- 'The Council states that it does not anticipate any negative effect from the proposal on any local school and, on the contrary, that it will be a positive change for pupils. This appears to be a reasonable and fair statement.

2.20 The Council's Response:

Within the consultation document on page 23 the Council stated that the estimated amount which would be required for the capital investment. These estimates have been reviewed by the Community Services Division, the Architect Manager has looked at the rooms which were identified by schools where appropriate and provided estimates against the work schedule that would need to be carried out. For instance, in phase 1 it is anticipated spend will be around £300,000. With a potential in Phase 2 to be in the region of £270,000 for those premises that were identified with the exception of Faith Based provision as a premises has not been identified yet.

The staggered implementation plan to deliver these provisions will enable the Education Transformation team and Inclusion Service to have a detailed project action plan which will be adopted and developed in line with the delivery of this proposal and its timelines.

Estyn raised a valid point regarding the quality assurance process and addressing potential inequalities or challenges. A full detailed Equality Impact Assessment will be undertaken as part of the implementation planning.

2.21 Consultative Conclusion

In conclusion, the consultation process has demonstrated that the proposal has widespread support from key stakeholders. There is recognition by both consultees and the Council of the need to address the short, medium and long-term capacity requirements. Education remains committed to the delivery of the proposal, as do all the schools that are mentioned within the consultation document. The two phased approach will support delivery of a sustainable ALN provision in Phase 1 whilst also planning additional capacity for Phase 2, in the development of an effective and sustainable long-term solution for Blaenau Gwent vulnerable learners.

Options for Recommendation

- 3.1 There are 2 options associated with the consultation, as follows:
- Option 1 The Cabinet considers and accepts the out-turn report, associated documents and course of action, including proceeding to Statutory Notice.
- Option 2 The Cabinet provide comments in relation to improvements that can be made in relation to the proposed course of action, (proceed to Statutory Notice) in consideration of the School Organisation Code (2018) and established timeline.

4. Evidence of how this topic supports the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan

- 4.1 In accordance with the Welsh Government School Organisation Code (2018), there is a statutory requirement for Councils to consult upon and publish school reorganisation proposals. Education is a strategic priority within the Corporate Plan. In order to enable people to 'Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent'.
- 4.2 In addition, the proposal would support the Education Directorate's purpose to deliver:

'Better Schools, Better Citizens and Better Communities'

5. Implications Against Each Option

5.1 Impact on Budget (short- and long-term impact)

There are capital financial implications associated with Phase 1 of this proposal for the Council of approximately £300,000. This will be met via contributions from the Welsh Government ALN Grant funding and Sustainable Communities for Learning Programme over a 3-year period.

5.1.1 Blaenau Gwent currently has 11 ALN pupils that are educated outside the Local Authority at a cost of £600,000 per year (22/23 price base), the budget for 2023/24 is £720,000. If Blaenau Gwent was able to increase capacity in

resource base provisions, there would be opportunities to consider making education provision for some of the 11 pupils back in Blaenau Gwent.

- 5.1.2 Revenue implications associated with Phase 1 of the project have been modelled If pupils are unable to be placed locally in a resource base, then they would need to be placed in Out County placements which could see these annual costs incrementally increase in line with the projected demand by approximately £1.3m by the 2025/26 financial year.
- 5.1.3 The financial implications associated with Phase 2 of the project will be considered in full once Phase 1 has been completed and the impact assessed.

5.2 Risk including Mitigating Actions

If the proposal is not taken forward, there is both a placement and a financial risk in terms of securing suitable ALN resource bases provision in and Out of County for learners, and the associated increased cost of Home to School Transport.

5.3 *Legal*

Legal advice has been sought in relation to the Statutory Notice. In accordance with the Welsh Government School Organisation Code (2018), there is a statutory requirement for the Council to undertake formal consultation with all interested and affected parties.

5.4 Human Resources

The proposed increase in pupil numbers will require the Governing Body of all affected schools to plan for the workforce requirements in readiness for the respective expansions. Organisational Development will provide advice, support and guidance to the Governing Bodies for the workforce planning and consequential recruitment processes.

6. Supporting Evidence

6.1 **Performance Information and Data**

Please refer to the Consultation document (Appendix 1) relating to the proposal.

6.2 **Expected outcome for the public**

The public can expect a fair and equitable consultation process, which is fully compliant with the Welsh Government School Organisation Code (2018).

6.3 Involvement (consultation, engagement, participation)

Stakeholder engagement is a key focus of all school organisation proposals. The proposal will be subject to consultation in line with the Welsh Government School Organisation Code (2018), which will then be used to inform decision making processes moving forward.

In addition, in line with the code, pupils will be consulted via the Youth Forum, Grand School Council and school councils of the affected schools where possible.

6.4 Thinking for the Long term (forward planning)

The consultation details a proposal which looks to secure additional provision for both Autistic Spectrum Disorder (ASD) and ALN Resource Base (ALNRB) provision in line with local demand for places for the long-term development, and sustainability of the education system in Blaenau Gwent.

6.5 *Preventative focus*

The proposal seeks to address sustainability issues associated with the future growth and development of the ALN reform Act and resource base placements in the County Borough.

6.6 **Collaboration / partnership working**

The consultation along with the development of the proposal have been developed collaboratively with both the Inclusion Team, Headteachers, Finance, and Community Services.

6.7 Integration (across service areas)

The proposal seeks to secure integration for new and existing pupils in ALN placements supporting growth and sustainability of provision for the future needs of learners.

6.8 **Decarbonisation and Reducing Carbon Emissions**

By having provision locally it will address the Green Agenda reducing carbon emissions for learners travelling excessively for their educational needs.

6.9 *Integrated Impact Assessment* See **Appendix 8** attached.

7. Monitoring Arrangements

7.1 There will be extensive monitoring in line with the consultation processes, responses and outcomes which would be answered, analysed and taken via the Council's political processes.

Background Documents / Electronic Links

Appendix 1 Consultation Document
Appendix 2 Consultee List
Appendix 3 List of Sessions (including the number of participants)
Appendix 4 Consultee Questions and Council Responses
Appendix 5 Redacted Correspondence Log
Appendix 6 Online Survey Overview
Appendix 7 Thematic Analysis
Appendix 8 Integrated Impact Assessment

This page is intentionally left blank



Blaenau Gwent County Borough Council

Formal Consultation Document proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

The Consultation Commences: Monday 24th April 2023 and concludes at 5pm on Tuesday 6th June 2023



Page 13

What is this booklet about?

This booklet has been prepared for parents/carers, school staff, school governors and the wider community of Blaenau Gwent. The booklet provides an overview of the consultation process associated with the Council's formal proposal for a **delivery model to improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough**. It will be of particular interest to parents/carers whose children are attending a Resource Base.

If you would like this information in any other format, please contact the Education Transformation team either via email or telephone, as follows:

- Email us: 21stcenturyschools@blaenau-gwent.gov.uk or,
- Call us on: (01495) 355470



1 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough **Glossary of Terms -** Please note the following terms used throughout this document:

Additional Learning	A pupil learner has ALN if there is a learning difficulty or disability which			
Needs (ALN)	calls for additional learning provision (ALP).			
Autism Spectrum	Is a complex developmental condition that involves persistent			
Disorder (ASD)	challenges in social interaction, speech and nonverbal communication			
	and restricted/repetitive behaviours. The effects of ASD and the severity			
	of symptoms are different in each person.			
Child Looked After	Is a child in the care of a Local Authority either: through a Care Order			
(CLA)	made by a court, or voluntary agreement with their parent(s) to			
	accommodate them.			
Local Authority	An organisation that is officially responsible for all the public services			
	and facilities in a particular area.			
Local Development	Sets out each local planning authority's proposals for future			
Plan (LDP)	development and use of land in their area.			
Numbers on Roll	The number of pupils at a school (not including nursery and Learning			
(NoR)	Resource Base Pupils).			
Pupil Level Annual	PLASC is an electronic collection of pupil and school level data provided			
School Census	by all maintained sector primary, middle, secondary, nursery and special			
(PLASC)	schools in January each year (more information can be found on the			
	Welsh Government website).			
Resource Base (RB)	A small setting in a mainstream school for pupils with ALN whose needs			
	cannot be met in the mainstream alone. Pupils are taught by specialist			
	teachers and learning support assistants. It is anticipated that pupils			
	accessing a resource base will also have opportunities to attend			
	mainstream classes.			
Special School	A school for pupils with a complex learning/medical need or disability,			
	whose needs cannot be met in a mainstream school or Resource Base			
	provision. The pupils at a special school will have either a statement of			
	SEN or an IDP.			
Statement of	A pupil with a statement of SEN or an IDP who has additional learning			
Additional Learning	needs which calls for additional learning provision. This means:			
Needs	 the pupil has significantly greater difficulty learning than most 			
	pupils of the same age, or			
	 the pupil has a disability that needs different educational facilities 			
	from those that the school generally provides for pupils.			
Statutory Notice	A statutory notice is the formal publication of a finalised proposal. This			
	will only be undertaken if a decision is made by the Council's Executive			
	Committee to proceed with a proposal, following consideration of all			
	responses from the consultation process. This is a legal requirement as			
	outlined in the School Organisation Code (2018).			
Statutory School Age	A child who is over the age of 5 and under the age of 16 that is eligible			
(SSA)	to attend school.			

|--|

Section 1: Introduction	Page 6-7
Section 2: Consultation Process	
 Who we are consulting with Consultation Overview Consultation with Children & Young People 	7 7-8 8
Section 3: The Proposal	
 Overview Investment Objectives Rationale and Background Information - Why change is necessary ALN Policies & Principles Standards of Provision Need for places and the impact on accessibility of schools Learning Resource Bases Covid Pandemic & Post Covid emerging theme Demand for Places Specialist Schools Early Years and Nursery Provision Additional Learning Needs Provision Welsh-medium Provision Options Considered The Preferred Option Risk and Mitigation Benefits of Proposal Expected Benefits and Advantages (when compared with the status quo – do nothing) Disadvantages. Governance model Learner travel arrangements 	$\begin{array}{c} 9\\ 10\\ 10\\ 10\\ 10\\ 11-12\\ 12\\ 12-13\\ 13\\ 13\\ 13\\ 13\\ 14\\ 14-15\\ 15-16\\ 16\\ 16-17\\ 17\\ 17\\ 17\\ 17\\ 17\\ 18\\ 18\\ 18\end{array}$
Section 4: Consultation Outcome and Next Steps	
 Consultation Report Statutory Notice Determination of Proposal Decision Notification Timeline 	19 19 19 19 19
Section 5: Details of Affected Schools	
 Schools that are directly affected Schools that are in-directly affected Surplus Capacity Statement 	20 20 20-21

Section 6: Other Considerations

Finance	21
Revenue Costs	21-22
Transport Costs	22
Capital Costs	22-23
Capital Costs/Capital Receipts	23
Admission Arrangements	23
 Impact of the proposal on the Welsh Language 	23
Equality impact Assessment	23
Community & Welsh Language Impact Assessments	23
United Nations Conventions for the Rights of the Child (UNCRC)	23-24
Engagement of Children & Young People in this Consultation	24
 Housing developments 	24
 Human Resource 	24-25
 Partnerships 	25

Section 7: Present Arrangements

•	Estyn	25
•	Quality and Standards in Education	25-26
	 Standards 	26
	 Wellbeing & Attitudes to Learn 	26
	 Teaching & Learning Experience 	26
	 Care, Support & Guidance 	26
	 Leadership & Management 	27
•	Impact of the Proposal	27
	• •	

Section 8: Overview of the Proposal

- Admission no. and arrangements and no. of nursery places
- Age range
- Pupil places
- Capacity
- Location
- Category school and language
- Schedule of accommodation
- List of facilities provided under the Proposal
- School Catchment Area
- Transition arrangements

Section 9: Pro-forma

27-29

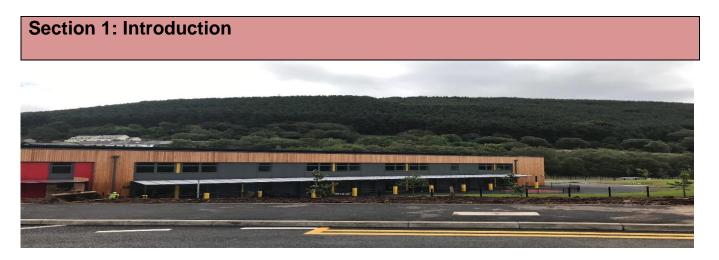
Appendix 1: Consultee list	31
Appendix 2: Location, Pupil Numbers & Projects for schools affected	32
Appendix 3: Condition Survey and Facilities review for schools affected	33
Appendix 4: Community Impact Assessment (CIA)	34-36
Appendix 5: Estyn Results for New Proposals	37-38
Appendix 6: Estyn Recommendations for New Proposals	39-40

Tables:

1. Drop in Sessions	8
2. Long List of Options	15-16
3. Risks & Mitigation	16-17
4. The Statutory Process Timeline	19
5. Potential breakdown of costs per individual Resource Base	22-23
6. Phase 1 New proposed Resource Bases	27-28
7. Phase 2 New proposed Resource Bases	28

Figures:

1. Current Primary Resource Base Provision	11
2. Current Secondary Resource Base Provision	11
3. Primary Resource Base data last 5 years	12
4. Secondary Resource Base data last 5 years	12
5. Pupil Projections for Resource Base Primary	14
6. Pupil Projections for Resource Base Secondary	14
7. Illustration of Housing Development	24



The Council are committed to providing all children and young people with high quality education and training tailored to meet their needs, which will develop their potential, extend aspiration, promote social inclusion, and contribute to the economic regeneration of the area. A review of existing and future provision for both Autism Spectrum Disorder (ASD) and ALN Resource Base is essential for pupils to enable them to fulfil their potential. Therefore, this proposal is a key priority for the Council.

The Additional Learning Needs and Education Tribunal (Wales) Act 2018 (ALNET) Legislation 2018 and the Corresponding ALN Code of Practice 2021 came into force with the focus now changing on how data is recorded in Local Authorities and schools. The focus is now on schools meeting the needs of pupils under universal and targeted provision through quality teaching and learning.

Blaenau Gwent County Borough Council ("the Council") reviews the capacity of its schools on an annual basis. As such, the Council is responding to the increased demand and growth noted over the course of the last 3 years, in line with pupil placement requests to the ALN panel for both ASD and ALN Resource Base (RB) settings.

The County Borough currently has 2 special schools which are:

- Pen y Cwm Special School which caters for complex needs; and
- The River Centre 3-16 Learning Community for Social and Emotional Behaviour Difficulties (SEBD) consisting of 3 separate sites:
 - Primary Phase (Thomas Richard Centre)
 - Secondary Phase (Pontygof site Ebbw Vale)
 - Stewards House (Ebbw Vale)

There are also seven Learning Resource Bases for Autistic Spectrum Disorder (ASD) and ALN in mainstream settings across the County Borough:

- Primary sector:
 - Abertillery 3-16 Learning Community Six Bells Campus
 - Coed y Garn Primary School
 - Glanhowy Primary School
 - Willowtown Primary School
 - Ystruth Primary School
- Secondary sector:
 - Abertillery 3-16 Learning Community ALN Secondary Campus
 - Ebbw Fawr 3-16 Learning Community ASD Secondary Campus**

6 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough ** Ebbw Fawr 3-16 Learning Community Secondary Campus also has a school transitional class which under this proposal will be formally recognised as a Council run resource base.

Section 2: Consultation Process

Prior to any decision being made on the proposal to **Improve provision and build capacity for Additional Learning Needs Pupils which includes ASD and ALN RB's across the County Borough**, the Council is required to undertake statutory consultation with all interested and affected parties. This is necessary since the proposal will see the establishment and change of ALN provisions in a number of Primary and Secondary school in the County Borough. This section provides an overview of the consultation process.

This consultation, will provide consultees with the opportunity to learn more about, understand and express their views on the Council's proposal, which will inform the final decision as to how the proposal is taken forward. The feedback and comments received during the consultation process will be collated, analysed, and included in a consultation report which will be published. Consultees who wish to register their wish to be notified of the publication of the consultation report should contact the Council using the contact details in this document. The Councils Cabinet will then make the final decision on whether to take forward some or all of the proposals based on the outcome and feedback received during the consultation.

Who we are Consulting with

This Consultation Document will be distributed, in accordance with the Welsh Government's School Organisation Code Version 2 (November 2018). **Appendix 1** of this this consultation document details the full list of consultees who will be targeted during the statutory consultation period.

Consultation Overview

The consultation period for this proposal will commence on **Monday 24th April 2023** and conclude on **Tuesday 6th June 2023**. Consultees can submit their views on the proposal; however, it should be noted that responses received during this period will not be logged as objections to the proposal. Objections can only be registered following the publication of the Statutory Notice. Should the proposal proceed, and consultees wish to make an objection, they will need to do so in writing during the statutory notice period outlined on **page 20**.

The Council would like you to consider the information set out in this document and provide your views on the proposals.

If you have any questions about the proposals or queries on the information contained within this document or suggestions or alternatives to the proposals, please contact us by using either the email address below, or by calling us on (01495) 355470.



21stcenturyschools@blaenau-gwent.gov,uk

You are also welcome to complete the online survey using the following link: <u>https://online1.snapsurveys.com/d1daqu</u>

Written comments on the proposal can be sent to: Education Transformation Team, Education Department, Floor 8 Anvil Court, Abertillery, NP13 1DB

All consultation responses should be received by 5pm on Tuesday 6th June 2023 at the latest.

The Education Transformation team has planned virtual meetings with Trade Union and Scrutiny Committee representatives. All affected School Governing Bodies, Staff, Pupils parents and the wider community will have access to a series of scheduled drop-in sessions throughout the consultation period. At all of the below events in **Table 1**, Council officers will be available to answer any questions that you may have.

Location	Date	Time(s)	Session aimed at:
Ebbw Vale Learning Action Centre James St, Ebbw Vale NP23 6JG	2 nd May 2023	3pm – 6:30pm	Governing Body, All Staff, Parents and Wider Community
Ty Bedwellty Morgan Street, Tredegar, NP22 3XN	3 rd May 2023	3pm – 6:30pm	Governing Body, All Staff, Parents and Wider Community
Abertillery Metropole Cultural & Conference Centre 2 Mitre St, Abertillery NP13 1AE	9 th May 2023	3pm – 6:30pm	Governing Body, All Staff, Parents and Wider Community
Brynmawr Rugby Club Catholic Road, Brynmawr NP23 4EF	10 th May 2023	3pm – 6:30pm	Governing Body, All Staff, Parents and Wider Community

Table 1 - Drop in Sessions

A frequently asked questions page will be developed and updated throughout the consultation period and can be found on the consultation webpage. Should you feel the need to and/or feel strongly about discussing the proposal in person, please contact us via the 21st century schools email address as follows: <u>21stcenturyschools@blaenau-gwent.gov.uk</u> and a virtual meeting over Microsoft teams can be arranged.

Consultation with Children and Young People

There will be an opportunity for the pupils of any new or existing school where there will be a ASD or ALN RB established, along with other children and young people from the county borough to participate in the consultation process. All information gathered from the consultation process will form part of the consultation report.

Section 3: The Proposal

Overview

Blaenau Gwent County Borough Council propose to increase the capacity for ALN and ASD Resource Bases across the County Borough in certain Primary and Secondary Schools. This will involve the establishment and change of ALN provisions in a number of Primary and Secondary Schools.in the Council Borough. The proposal is to increase ASD and ALN places from 61 to 86 across the Primary Schools and increase the provision at Secondary Schools from 62 to 80 places in Phase 1 (including 15 Welsh-medium places). Further the proposals include the potential to increase places by a further 40 places in Phase 2 (including a Faith Based provision). This will take effect from September 2023 on a phased basis over the next 5 years.

The Council plan to remodel existing learning environments to create classroom spaces and associated facilities to accommodate and provide appropriate resources for the proposed ALN and ASD provisions In addition, and alongside this, the Council will work with the schools to develop a long-term plan to support sustained growth and development.

Therefore, this proposal will be delivered in 2 phases:

Phase 1

- To recognise the transition group established in Ebbw Fawr 3-16 Learning Community-Secondary Phase as a 6 place RB from September 2023
- To create a 6-8 place ASD Resource Base at Tredegar Comprehensive School from September 2023
- To create a 10 place ASD/ALN Resource Base at Sofrydd Primary School from September 2024/25
- To create a 15 place ASD/ALN Resource Base at Ysgol Gymraeg Bro Helyg from September 2024

Phase 2

The development of a Medium-term plan to secure additional capacity to facilitate sustained growth and development in Primary and Secondary Schools. This will include provision at the below schools between 2025 and 2029:

- To create an ASD/ALN Resource Base at Brynmawr Foundation School for 10 pupils
- To create an ASD/ALN Resource Base at Cwm Primary School for 10 pupils
- To create, if required, an ASD/ALN Resource base at a Faith Based Primary school (such as Roman Catholic/Church in Wales Schools) in Blaenau Gwent (yet to be determined) for 10 pupils
- To create an ASD/ALN Resource Base at Abertillery 3-16 Learning Community Roseheyworth Road Primary Campus for 10 pupils

The proposal would support the Education Directorate's purpose to deliver:

'Better Schools, Better Citizens and Better Communities'

The proposal is in keeping with Blaenau Gwent's Sustainable Communities for Learning Programme investment objectives which are:

- Investment Objective 1: to raise standards and achievement in line with localised targets at Foundation Phase, KS2, KS3 and KS4; and secure improved transition into post 16 learning
- **Investment Objective 2:** to create a sustainable model for the 21st Century school estate in consideration of both capital and revenue investment, along with the condition and suitability of buildings
- **Investment Objective 3:** to establish effective management and provision of school places, by having the right schools of the right size in the right place
- **Investment Objective 4:** to implement the Sustainable Communities for Learning Programme (formally the 21st Century Schools programme) in line with local, regional and national school organisation policy; ensuring synergy between progression, development and implementation
- Investment Objective 5: meeting the needs of learners who are vulnerable and/or present with ALN

Rationale and Background Information - Why Change is Necessary





ALN Policies and Principles

The ALNET Legislation came into force in 2018 and the ALN Code of Practice has been implemented since 2021. the focus has now changed on how data is recorded in Local Authorities and schools. The focus is now on schools meeting the needs of pupils under the universal and targeted provision through quality teaching and learning.

The Council has reviewed all provision for pupils with ALN across the County Borough. This review has better enabled the Local Authority to continue to meet the needs of all pupils. In addition, a working party of key stakeholders with an ALN focus including Headteachers from across Blaenau Gwent is operational. It is the expectation that the working party will also inform future planning for supporting all pupils with an additional learning need, including Welsh medium settings.

Standards of Provision

Should this proposal proceed, it will improve the suitability of the learning environment for pupils with ALN, it will also provide access to local provision in mainstream settings for ALN pupils. This will help with individual needs of pupils such as health, safety and welfare issues identified in the application for places in Resource Bases.

Places will be available locally for pupils living in Blaenau Gwent; improving learner outcomes and inclusion on a County Borough level. Also the proposal can offer places in Blaenau Gwent for pupils from other Local Authorities, should the need arise and if space is available.

10 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

Need for additional places and the impact on accessibility of schools

The data collated below demonstrates that there is a need for ASD/ALN provision in our mainstream schools to support this proposal. Currently provision is full in our ALN resource bases and there will be no growth to support our learners if this proposal does not proceed. Blaenau Gwent already has cross border regional working arrangements in place for places in ALN provision.

All learning resource bases for both ASD and ALN are based in primary and secondary mainstream settings across the County Borough. These settings cater for 3-16 year olds (no nursery ASD provision). Other than Pen y Cwm Special School, Blaenau Gwent does not have any post 16 settings in its secondary school buildings, any pupil over the age of 16 would transition in to Post 16 opportunities which could include Coleg Gwent, apprenticeships, work-based learning or employment.

The current provisions are shown below in **Figure 1 & 2**, this information is for academic year 2022/23 as at 14th December 2022.

Figure 1 - Current Primary Schools	Type of Provision	Places available	Places taken	Places available
Abertillery Learning Community 3-16 Six Bells				
Primary Campus	ALN RB	9	7	2
Coed Y Garn Primary School KS2	ALN RB	12	12	0
Glanhowy Primary School	ASD	12	14	-2
Willowtown Primary School	ALN RB	16	15	1
Ystruth Primary School	ASD	12	14	-2
	Total			
	spaces	61	62	-1

Figure 2 -	Type of	Places	Places	Places
Current Secondary Schools	Provision	available	taken	available
Abertillery 3-16 Learning Community -				
Secondary Campus	ALN RB	42	41	1
Ebbw Fawr 3-16 Learning Community –				
Secondary Phase	ASD	18	21	-3
Ebbw Fawr 3-16 Learning Community –	Transition			
Secondary Phase	group		6	-6
	Total			
	spaces	60	68	-8

The tables above show there is limited capacity in the County Borough to accommodate demand in the resource bases. In 2015 the Council undertook an ALN consultation resulting in the redesignation of a primary complex needs resource base to ASD provision and the opening of a new provision at Ebbw Fawr 3-16 Learning Community – Secondary Phase. **Appendix 2** (location, pupil numbers and projections) **and Appendix 3** (Schools condition survey and facilities) provides an overview of all the schools within the County Borough directly and indirectly affected. This information provides details of the facilities available in all schools and numbers on roll. There has been significant investment into the school estate from our Sustainable Communities for Learning programme, Welsh Governments Capital Maintenance Grant and the ALN grant to improve provision for our pupils.

11 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough The most recent investment has been in:

- Pen y Cwm Special School to improve their specialist rooms and learning environment
- River Centre 3-16 Learning Community secondary campus refurbishment
- Ysgol Gymraeg Bro Helyg, creation of a sensory room and nurture space

Learning Resource Bases

Data in **Figure 3** (Primary) and **Figure 4** (Secondary) suggests that from 2017/18 in primary Schools, places have become in demand rising from 48 to 64 places (an increase of 25%), whereas in the secondary sector it has risen by 2 places from 60 to 62 (4%). However, as the primary sector numbers have grown significantly over the last few years there is a pressing need to create additional spaces in both primary and secondary Schools to accommodate demand.

Figure 3 - last 5 years Primary resource base figures

	Last 5 years data for Resource Bases						
Primary	2016/17	2017/18	2018/19	2019/20	2021/22		
Resource Capacity	n/k	61	61	65	65		
Places taken	n/k	48	45	65	64		
Amount over							
capacity	n/k	-13	-16	0	-1		

Figure 4 – last 5 years Secondary resource base figures

	Last 5 years data for Resource Bases						
Secondary	2016/17	2017/18	2018/19	2019/20	2021/22		
Resource Capacity	n/k	60	60	62	62		
Places taken	n/k	60	60	62	62		
Amount over							
capacity	n/k	0	0	0	0		

Pupil numbers and demand for places at Resource Bases has significantly increased over the course of the last four years, resulting, on occasions, in oversubscription, along with a waiting list, which as of March 2023 has 6 pupils awaiting placement. Therefore, the Local Authority is seeking to increase the capacity (in terms of the number of places) in Resource Bases as follows:

- Phase 1 Primary from 61 to 92 places (inclusive of 15 Welsh-medium places) and Secondary from 62 places to 76 places: and,
- Phase 2 potentially Primary from 92 to 122 places (inclusive of 10 Faith based places) and Secondary from 76 to 86 places

The Local Authority is projecting a continued upward trend in terms of demand/pupil numbers going forward. If projected demand for places in Resource Bases continues it will put pressure on the Local Authority to place pupils Out of County, should we not be able to secure additional places locally. The Council seeks to address the aforementioned issues by increasing the capacity of local Resource Bases in mainstream school and River Centre 3-16 Learning Community secondary campus to facilitate the increased demand for places and secure medium-term growth.

Covid Pandemic and Post Covid emerging theme

Since the Covid Pandemic in 2020, there has been an impact on everything worldwide. This includes all services provided by the Council. Work practices changed with the introduction of digital engagement with parents, and as a result there has been a rise in numbers of children in their early years who require additional support via the health services (diagnoses) and education 12 [Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

support where they have missed that social interaction with other children. The full extent of development delay as a result of Covid and associated factors is unknown currently but is expected to increase the need of Blaenau Gwent pupils moving forward.

Demand for Places

Within Blaenau Gwent and based on the September 2022 Pupil Level Annual School Census (PLASC) data the number of pupils with Additional Needs (has increased. At present, 14% (1,389) of Statutory School Age pupils (9,389) in the County Borough have an Additional Learning Need/SEN Status. There are currently 250 children with a Statement of SEN or an IDP (Individual Development Plan) in Blaenau Gwent of Statutory School Age.

In an attempt to develop a model with the aim of predicting the number of places required, the Council has used historic data and associated trends and have considered the number of requests which were agreed by the ALN Panel. We have also considered the number of resource base and special school leavers on an annual basis. We were then able to establish the net increase on an annual basis. Based on the current numbers on roll, and the information above, we have predicted forward demand.

Therefore, demand has risen and is likely to continue to do so in line with inward migration, increased survival rates of children with complex needs and finally, placement requests from other Local Authorities with sufficiency issues. The Council is aware that the growth and demand for specialist education placements is on the increase throughout Wales. Neighbouring Authorities have undertaken consultation upon growth of special school capacity and resource bases to facilitate demand, or are considering doing so, due to sufficiency of places. If The Council does not secure sufficient places for its pupils, it is unlikely that neighbouring Local Authorities will have capacity to accommodate them, resulting in potentially very high Out of County placement costs, increased traveling time and decreased accessibility to local education options for the most vulnerable pupils with the highest level of need.

Specialist Schools

It should also be noted that in 2020 the council went out to consult on increasing the capacity for Pen y Cwm Special school to accommodate the demand for special school placements. This was approved in 2021 for September 2021 implementation. Part 1 of the consultation is near completion with the special provision offered being re-established. Part 2 is still in development.

Also, in January 2017 the River Centre 3-16 Learning Community was established. This provision is based over three sites primary (Thomas Richard Centre) Secondary (Pontygof) and Stewards House offering 64 places, 40 of which were turn around and 24 places on full time roll.

Early Years and Nursery Provision

The supporting data below shows that there is demand at this early stage of a child's life. Out of the September 2022 cohort of 129 children in early years setting 49 are transferring to nursery and are known to need support. A further 24 children have been awarded funding with a screened application for additional support. These figures can change weekly as there are 3 intakes throughout the year.

It is anticipated that as a targeted solution needs to be developed to create a solution, for children in Early Years to be supported in the mainstream environment.

Additional Learning Needs Provision

The proposal to extend the capacity and undertake physical changes to existing buildings whilst also developing a long-term growth and sustainability plan, would create equality of access to a high-quality ALN provision in a 21st Century learning environment for pupils.

Pupil projections based on current numbers:

Figure 5 - Pupil projections for resource bases at Primary

	Baseline Data	5 Years Projections				
Primary	22/23	23/24	24/25	25/26	26/27	27/28
Places available	61	61	61	61	61	61
Places taken	62	60	63	64	65	67
Leavers	1	10	12	11	11	11
Joiners next year	13	13	13	13	13	13
Total at start of next year	60	63	64	65	67	69
Amount over capacity - demand	-1	2.	3	4	6	8

Figure 6 - Pupil projections for resource bases at Secondary Pupil projections for resource bases at Secondary

	Baseline Data	5 Yea	5 Years Projections - based on Yea pupils			Year 6
Secondary	22/23	23/24	24/25	25/26	26/27	27/28
Places available	62	62	62	62	62	62
Places taken	66	77	74	69	60	61
Leavers	6	13	17	20	12	17
Joiners next year	17	10	12	11	13	13
Total at start of next year	77	74	69	60	61	57
Amount over capacity	15	13	9	-3	-2	-6
Ebbw Fawr transition group	6	6	6	6	6	6
Amount over capacity - demand	9	6	1	-8	-7	-11

Note: This doesn't take into account potential transfers from Out County placements or the Council's Special Schools

Welsh Medium provision:

Blaenau Gwent does not currently have a Welsh-medium Primary Resource Base for pupils. This will form part of the proposal. All pupils of secondary school age wanting Welsh-medium education receive their education in Torfaen in Ysgol Gymraeg Gwynllyw 3- 19 Learning Community.

Under this proposal a room has been identified within the school for a Resource Base that could accommodate up to 15 pupils. Ysgol Gymraeg Bro Helyg have stated that there are 8 pupils who have ASD/ADHD traits at the school. As yet, not all of the aforementioned pupils have received a formal diagnosis. all except 2, are in receipt of Educational Psychology engagement with referrals having been made. Nursery provision at the school is offered on a full-time basis. Therefore, the pupils needs tend to be identified relatively early on. Currently, in Key Stage 2, there are several pupils who would benefit from small-class teaching.

It is recognised that the provision of a Resource Base would not only provide tailored support to the pupils who have been identified as needing this consistent level of intervention and support; but would also free up teacher time to focus on pupils requiring additional support e.g. pupils with a Specific Learning Difficulty (SpLD). Any Resource Base in Blaenau Gwent English medium settings would take children from across other school settings in Blaenau Gwent. However, in the case of a Welsh-medium Resource Base it will only be for children educated through the medium of Welsh.

Ysgol Gymraeg Bro Helyg also have an immersion class set up to support new entrants into Welsh-medium education, which would support parental choice for those pupils who also want to transition into Welsh education.

Options Considered

A detailed option appraisal was undertaken to explore ways in which the requirement for additional ALN provision in the form of ASD and ALN Resource Bases could be addressed for both English and Welsh Medium Education along with primary and secondary need. Factors such as location, site and type of provision were considered.

The long list of options detailed within **Table 2**, were later re-evaluated and a short-list drawn up, so that the benefits, risks, timelines, costs etc. could be explored in much greater detail.

The key factors are securing places in the short to medium-term, which can be delivered over the course of the next five years:

Options	Description:	Conclusion:
1	Business as usual- maintain the status quo	This is a standard baseline comparator which must be considered, but not an option, as it does not address the identified need. Discounted
2	Build capacity immediately in many settings all at once in both Primary and Secondary Mainstream settings in the County Borough and the River Centre 3- 16 Learning Community -Secondary Phase	Merits further consideration, but financial constraints, would not permit effective and timely implementation. Possible
3	Build Capacity (including Welsh Medium places & Faith Based provision) over the next 5 years to increase both Primary and Secondary Mainstream Settings in County Borough and in the River Centre 3-16 Learning Community Secondary setting	Preferred way forward in, this will address Secondary need and Welsh Medium demand Imminently and plan medium and long-term growth. Possible
4	Send Pupils who require support to Out of County Resource Bases	Not enough capacity exists, and this would not support the vision for education in securing localised, accessible and high-quality provision. Also very costly. Discounted
5	Tackle capacity issues in just secondary school settings	Merits further investigation in line with a detailed exploration availability in secondary school buildings and cost implications associated with the delivery, model and vision for ALN. Possible

Table 2 – Long List of Options

^{15 |} Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

6	Tackle capacity issues in just Primary	There is currently immediate demand in the
	school settings	secondary sector for places
	-	Discounted

Options 1, 4 and 6 have been discounted as they would potentially:

- Not address the immediate and medium-term need
- Result in increased costs for ALN pupils if they had to be educated out of county
- Cause disruption within the existing education system
- Negatively affect provision and access to specialist facilities and services

The short list included:

- Option 1 (business as usual)- Maintain the status quo
- **Option 2** Build capacity immediately in many settings all at once in both Primary and Secondary Mainstream.
- **Option 3** Build Capacity (including Welsh Medium places and Faith Based places) over the next 5 years to increase settings in both Primary and Secondary Mainstream
- Option 5 Tackle capacity issues in just secondary school settings

The Preferred Option

Option 3 – To build capacity (including Welsh Medium places & Faith Based provision) over the next 5 years and increase provision in both Primary and Secondary settings, is the preferred option as this will addresses the immediate need at secondary provision and Welsh Medium demand and plans for medium and long-term growth and sustainability. Option 2 & Option 5 were not considered the preferred option due to:

- Financial constraints
- Fail to address long term sustainability issues

Risks and Mitigation

Blaenau Gwent Council has a proven track record of managing both school build and school organisation projects – including the requirement to increase school capacity. The following risks can be managed and largely mitigated as follows:

Risk	Mitigation
If the proposal is not taken	The Local Authority is working closely with key colleagues to
forward, there is both a	provide a local solution that is cost effective and reduces the
placement and a financial	number of pupils travelling to and accessing already limited
risk in terms of securing	Out of County placements. However, the LA has a proven
suitable Out of County	track record of working to secure appropriate placements for
provision for learners	learners throughout the region.
The consultation process	Blaenau Gwent Council's Education Directorate is
does not address	experienced in and have recently undertaken consultation
stakeholder perspective	upon proposals, whilst being fully compliant with the Welsh
and understanding of the	Government School Organisation Code (Version 2, 2018).
proposal. Therefore, the	
proposal is not supported	
and does not progress.	

Table 3 – Risks and Mitigation

The proposal to expand existing provision is delivered late Insufficient capacity for future demand.	Delivery plans are in place and can be facilitated at pace in line with the outcome of the statutory processes associated within this proposal i.e. consultation and statutory notice. The purpose of this proposal is to build extra capacity to meet a previously unforeseen demand and to allow the Council to monitor and explore long-term options to secure sustainable growth.
The projected capital investment costs exceed the budget.	The sites associated with the proposal are well known to the Blaenau Gwent Project team for Sustainable Communities for Learning, and so the cost estimates are based upon actual knowledge and understanding, with a built-in contingency to address any potential unknowns. Budget monitoring is undertaken regularly to inform future plans. Capital funding via the ALN Grant and Sustainable Communities for Learning Programme will be utilised over a 3–5-year period to deliver the proposal.

Benefits of Proposal

This proposal would ensure equality of opportunity for all pupils - particularly those with the greatest level of need, to be educated locally. The proposal further facilitates inclusion and an inclusive approach within Education, ensuring access to high quality specialist education facilities and support for pupils with ALN within the County Borough. It will also go some way to addressing the barriers parents perceive in accessing specialist education and reducing the Council's carbon footprint associated with travel for education purposes.

Should nothing change, the Council will be unable to meet the needs of all learners particularly those with ASD and ALN within Blaenau Gwent. Therefore, they would need to be placed Out of County at significant cost, with learners having to manage longer school journeys affecting families and socialisation for many pupils.

Expected Benefits and Advantages (when compared with the status quo):

- Pupils will be accessing suitable and appropriate provision within their locality;
- Pupils will be accessing suitable and appropriate provision in terms of protected characteristics e.g. faith or language;
- Creation of a local solution which will address the increased demand for ALN provision;
- Continuity and sustainability in terms of local education for pupils with ALN;
- The structure will build confidence and self-esteem in pupils, parents and staff;
- A local option for pupils transitioning from mainstream school to resources bases;
- Reduce the costs of out of county placements for pupils, whilst securing local investment within the Blaenau Gwent school estate;
- Improve access to and facilities for pupils who meet the criteria for ALN provision across the County Borough;
- Increased capacity and sustainability of placement; and
- Reduced travel time and carbon footprint for pupils

Disadvantages:

- Potential parental concerns in relation to placement in Resource Bases; and
- Pupil numbers in schools identified as potential bases may grow if there is any inward migration into the area.

Governance Model

Of the school identified within the proposal (Including Brynmawr Foundation School), the Governing body will have to agree to host an ASD/ALN base and be responsible for the day to day running of the resource base. The Governing Body or the diocese, as relevant, would need to agree to change the characteristics of the school need to agree to the placement of provision and take on the local authority arrangements via the ALN panel for children and young people to be placed.

Learner Travel Arrangements

The Council's Home to School and Post 16 Transport Policy 2023/24 states that free home to school transport will be provided as follows:

The Council will provide transport assistance for pupils with ALN:

- if existing transport arrangements are deemed unsuitable in line with pupil needs, alternative arrangements will be determined by the Inclusion ALN Panel;
- if it is not appropriate for the pupils to walk to school due to the nature of their additional learning need and/or disability; and/or,
- if it is determined by ALN Panel that there is no appropriate education provision within the County Borough suitable to meet pupil need.

The above arrangements will be subject to review in line with changes to circumstances relating to the pupil(s) transport requirements.

Pupils requiring Additional Learning Needs (ALN) transport who live:

- over 1.5 miles (for those under 8 years of age); and/or,
- over 2 miles (for those aged between 8-16 years of age)

from their nearest suitable ALN provision, will automatically qualify for free home to school transport. Please note in instances where the school is a parental choice and not the provision determined by the ALN Panel, no transport will be provided.

The Council has established a process in order to assess the travel needs of children who may require ALN transport, as follows:

- All requests to ALN Panel for consideration of change of placement will firstly be considered by the Transport team to determine their eligibility for transport on distance grounds
- The Council's ALN Panel will then consider the request for change of placement, and if agreed, determine the appropriate placement and identify if transport is required to access the agreed placement

Where transport has been agreed, the Transport Officer will contact the parent and inform them of the arrangements. In cases where transport requests are refused, parents/carers will receive notification from the ALN team, also indicating their right of appeal.

The current school location and infrastructure accommodates bus and taxi drop off and pick-up at the start and finish of the school day, with sufficient parking for staff and key partners to visit.

Section 4: Consultation Outcome and Next Steps

Consultation Report: Feedback from the consultation will be collated, analysed and presented in a Consultation Report to the Council's Executive Committee in **June 2023**. The report will be available on the Council's website two weeks prior to a decision being made to publish a statutory notice. Hard copies of the consultation report can be obtained on request via the email addresses detailed above on **page 8**.

Statutory Notice: Should this proposal (or the proposal with the appropriate modifications) be approved at Cabinet; the Council will then publish a statutory notice in **June 2023**. A copy of the statutory notice will be displayed on the Councils website and at any affected school within the County Borough. Hard copies of the statutory notice will be available on request. The statutory notice period will run for 28 days. During this time, you will be able to make formal objections should you wish to do so, as will be explained in the statutory notice. Any issues raised by interested parties will then be summarised in an objection report and presented to the Cabinet for a final decision to be made.

Determination of the Proposal: Blaenau Gwent Council will determine the proposal following the statutory notice period. After considering the responses to the statutory notice. This may lead to the approval, rejection or approval of the proposal with modifications.

Decision Notification: Once a decision has been made, an electronic copy of determination will be sent out to all interested parties and published on Blaenau Gwent Council's website within 7 days of the decision.

April	May	June	June	July	September
2023	2023	2023	2023	2023	2023
Consult	ation Period				
		Consultation report to Executive Committee			
			Statutory Notice		
				Objections	s Report
				Decision N	lotification
					Implementation September 2023 onwards

Table 4 - The Statutory Process Timeline

Section 5: Details of Affected Schools



Schools that are directly affected:

The below schools are directly affected by this proposal:

- St Joseph's R.C. Primary School, Ashvale, Dukestown, Tredegar, NP22 4AQ
- All Saints R.C. Primary School, Heol-yr-Ysgol, Ebbw Vale, NP23 6QP
- St Mary's R.C Primary School, Catholic Road, Brynmawr, NP23 4EF
- Abertillery 3-16 Learning Community, Roseheyworth Road Campus, Roseheyworth Road, Abertillery, NP13 1SR
- Brynmawr Foundation School, Clydach Dingle, Brynmawr, NP23 4XT
- Cwm Primary School, Canning Street, Cwm, Ebbw Vale, NP23 7RD
- Ebbw Fawr 3-16 Learning Community, Secondary Phase, Lime Avenue, Ebbw Vale, NP23 6GL
- Sofrydd Primary School, Sofrydd Road, Sofrydd, NP11 5DW
- Tredegar Comprehensive School, Stable Lane, Tredegar, NP22 4BH
- Ysgol Gymraeg Bro Helyg, Rising Sun Industrial Estate, Blaina, NP13 3DQ

Schools that are in-directly affected:

Schools that already have an ALN Resource Base and/or are connected via an all through school above

- Abertillery 3-16 Learning Community
 - Secondary Campus, Alma Street, Abertillery, NP13 1YL
 - o Six Bells Primary Campus, Six Bells Road, Six Bells, NP13 2NJ
- Ebbw Fawr 3-16 Learning Community, Primary Phase, Strand Annealing Lane Ebbw Vale NP23 8XF
- Coed y Garn Primary School, Parrot Row, Blaina, NP13 3AH
- Glanhowy Primary School, Coach Bach, Tredegar, NP22 4RW
- Willowtown Primary School, Brynheulog Street, Ebbw Vale, NP23 6NJ
- Ystruth Primary School, East Pentwyn, Blaina, NP13 3XG

The below information contains all schools that feeds into a secondary school under this proposal and has been broken down into areas below:

Tredegar Area:

- Bryn Bach Primary School, Merthyr Road, Tredegar, NP22 3RX
- Deighton Primary School, Stockton Way, Tredegar, NP22 3ES
- Georgetown Primary School, Oakfield Road, Tredegar, NP22 4LP

Ebbw Fawr area:

- Beaufort Hill Primary School, Bangor Road, Beaufort, Ebbw Vale, NP23 5QG
- Glyncoed Primary School, Badminton Grove, Ebbw Vale, NP23 5UL
- Rhos y Fedwen Primary School, Honeyfield Road, Rassau, Ebbw Vale, NP23 5TA

20 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

Ebbw Fach area:

- St Illtyds Primary School, Llanhilleth, Abertillery, NP13 2JT
- St Mary's C.I.W Primary School, Intermediate Road, Brynmawr, NP23 4SF
- Blaen y Cwm Primary School, Blaenafon Road, Brynmawr, NP23 4BR

Surplus Capacity Statement

Blaenau Gwent schools' capacity for September 2022 shows that there is sufficient space in our mainstream schools to support the development of an ALN resource base in both Primary and Secondary settings.

- In Primary overall there is 13% surplus spaces (places 5813 numbers on roll 5060)
- In Secondary overall there is 12% surplus places (places 3463 number on roll 3033)

Both our primary and secondary surplus places are at the lower percentage of an Amber position as per Welsh Governments data sets (between10% - 24%).

There will be no direct impact from this proposal for Pen y Cwm Special school.

Section 6: Other Considerations

Finance

Revenue Costs

In increasing provision in Resource Bases there will be a revenue implication associated with the proposal. All schools are funded in accordance with Blaenau Gwent Council's Fair Funding policy and will receive resources on the same basis as any other school within Blaenau Gwent, based upon pupil numbers and the area of the school building. It is difficult to accurately project the costs associated within the capacity increase, due to the following variables:

- o the reduction in funding for mainstream settings as a result of pupil placement,
- the level of cost avoidance as a result of pupil placement within Out of County settings from within Blaenau Gwent; and finally,
- the level of recoupment realised as a result of Out of County placement within existing resource bases.

Blaenau Gwent currently has 11 pupils (2022/23) that are educated outside the Local Authority in Independent Settings and a further 13 CLA pupils that would be placed in the nearest school to the LA in which they reside (foster/residential care) at a cost of circa £600,000 The budget for 2023/24 is expected to be £720,000.

Revenue costs associate with Phase 1 of the project are anticipated to be in the region of $\pounds756,973$ (breakdown) These figures are based on the 2023/24 price base. per annum

- 2023/24 £73,184
- 2024/25 £241,003
- 2025/26 £442,786

In years 2023/24 & 2024/25 it is anticipated the increased costs will be financed from ALN Implementation grants and the SEN reserve. From 2025/26, it is anticipated the proposal will begin to impact on the requirement for Out County placements therefore reducing this expenditure and allowing funding to be vired accordingly. However, there may be a requirement for short term cost pressures/invest to save funding to be awarded until the financial impact of reducing out of county placements materialises as pupils leave the system. Any cost pressures/invest to save funding will be proposed as part of the standards budget setting process.

If these pupils are not placed locally in a resource base, then they would need to be placed in Out County placements which could see these annual costs incrementally increase in line with the projected demand by approximately £1.3m by the 2025/26 financial year.

The revenue costs associated with Phase 2 will be considered in full once Phase 1 has been implemented and the impact assessed.

Transport Costs

Costs associated with home to school transport are increasing. The 2022/23 forecast transport costs associated with:

- Out of County placement are £247,352
- ALN bases attached to Primary school provision £286,008.74
- ALN bases attached to Secondary School Provision £226,652.30

Across all ALN offered provision, the costs associated with an academic year can be as high as $\pounds 654,508.65$, (excluding Pen Y Cwm Special School costs) this is dependent on the number of children requiring transport. These costs are regularly reviewed and subject to change in line with pupil placement. Should the proposal be implemented the Council would see an incremental reduction in the transport costs associated with Out County placements every year.

Capital Costs

The proposals will involve the remodelling of areas in the schools identified that can accommodate new provision already within the existing footprint of the schools, There are capital financial implications associated with this proposal for the Council, which are circa £570,000 over a 3–5-year period.

- Phase 1 £300,000
- Phase 2 £270,000

This will be met via contributions from within the ALN Grant and an element of Sustainable Communities for Learning Band B Programme over a five-year period. This figure is based on the assumption that the below table is applied over Phase 1 & Phase 2 of the proposal:

Table 5 – Potential breakdown of	ⁱ capital	costs per	individual	school	Resource Base	

Funding Stream	School	Capital Works	Fixtures/ Furnishings and Sensory equipment	
Secondary:				
ALN funding	Ebbw Fawr 3-16 Learning Community – Secondary Campus	0	0	
ALN Funding	Tredegar Comprehensive School	£90,0000	£40,000	
ALN Funding	Brynmawr Foundation School	£100,000	£30,000	

Primary:			
SCfL	Ysgol Gymraeg Bro Helyg (Welsh-	£100,000	£20,000
	medium)		
ALN Funding	Sofrydd Primary School	£20,000	£20,000
ALN Funding	Abertillery 3-16 Learning Community	£20,000	£20,000
_	Roseheyworth Road Primary Campus		
ALN Funding	Cwm Primary School	£90,000	£30,000
ALN Funding	Faith Based Primary School yet to be	£20,000	£20,000
_	determined		

Capital Costs/Capital Receipts

Should the proposal be approved, it will address the current shortfall in capacity for the Resource Bases in mainstream education. There will be capital costs associated with the proposal in facilitating the remodelling work within existing school building. However, the proposal will not involve the transfer of buildings or sale of any building. The proposal will be managed within existing building layouts.

Admission Arrangements

Admission to any ALN provision, whether it be a Resource Base in Mainstream Education or at a Specialist schools (Pen y Cwm Special School and The River Centre 3-16 Learning Community) is managed via the ALN Panel within the Inclusion Services Team, which is made up of representatives from schools, the Inclusion Service and wider Education representatives including the Education Psychologists. Referrals to the ALN Panel are made directly to the ALN team.

Impact of the Proposal on the Welsh Language

This proposal will impact positively on the provision of ALN for Welsh-medium pupils in Blaenau Gwent. Currently Blaenau Gwent only has one Welsh-medium primary school with another 210place school building being ready for occupation in 2024. The Council's Welsh in Education 10year Strategic Plan 2022-32 (WESP) aims to improve ALN provision for Welsh learners in the County Borough and this proposal will support the Council's directive. The school has identified 8 pupils, that could be supported via this proposal and the space within the school identified can accommodate 15 pupils which would create space for future needs of pupils with ALN.

Equality Impact Assessment

An Equality Impact Screening Assessment has been undertaken in order to assess the impact of key proposals and decisions upon protected characteristics. The assessment determined that none of the protected characteristics will be negatively affected, whilst ALN pupils will be positively affected (Please refer to **Webpage via link** <u>https://www.blaenau-gwent.gov.uk/en/council/consultations/proposal-to-improve-provision-and-build-capacity-for-additional-learning-needs/</u> for more information).

Community and Welsh Language Impact Assessment

A community impact assessment has been undertaken in order to assess the impact of key proposals and decisions upon stakeholders and the wider community (Please refer to **Appendix 4** for more information).

United Nation Convention Rights of the Child (UNCRC)

The Council in all its corporate responsibilities ensure that they will always engage positively with children and young people. If this proposal is implemented, it will realise benefits for children and

young people in accordance with the seven core aims of the United Nations Convention on the Rights of the Child, specifically:

Core aim 1 – have a flying start in life;

- Core aim 2 have a comprehensive range of education and learning opportunities;
- **Core aim 3** enjoy the best possible health and are free from abuse, victimisation and exploitation;
- Core aim 4 have access to play, leisure, sporting and cultural activities;
- Core aim 5 are listened to, treated with respect, and have their race and cultural
- identity recognised;
- **Core aim 6** have a safe home and a community which supports physical and emotional wellbeing; and

Core aim 7 – are not disadvantaged by poverty.

Engagement of Children and Young People in this Consultation

As part of this consultation process, the Education Transformation team in partnership with schools, will consult with pupils that are affected by the proposal, as well as engaging with both the Blaenau Gwent Youth Forum and Schools Grand Council.

Housing Developments

Over the course of the last 2 years, 235 houses (132 in 2020/21 and 103 in 2021/22) have been built in Blaenau Gwent. The below table projects the level of growth and is expected to continue. These potential homes either already have planning permission, are seeking legal agreement or are included in the Local Development Plan. This is likely to have an impact upon pupil place planning. The Education Transformation team monitor the impact upon schools.

Figure 7 Below - illustrates the number of housing developments which are currently in the Local Development Plan (LDP)

	Land whice time figur	d Avail h look scale es are	lability s at a the fol	Housi Study 5-year lowing fied fo		Land looks the fo	rding to Availa at a 5- ollowing ified for y.	bility St year tii g figure	tudy w mesca s are	hich Ile	Land looks the f	d Avai s at a ollowi tified f	to the lability 5 year ng figu for Ebk	Study times res are	which cale e
	2022	2023	2024	2025	2026	2022	2023	2024	2025	2026	2022	2023	2024	2025	2026
Housing Associations:	0	0	0	0	0	23	15	20	0	0	0	0	0	0	0
Private Sector Housing:	3	19	19	37	1	3	5	5	5	5	7	7	6	6	6
Total	3	19	19	37	1	26	20	25	5	5	7	7	6	6	6

The above data tells us that there are over 192 housing developments planned between 2022 – 2026. There is a potential for this to increase demand within both mainstream and special schools going forward with inward migration of families.

Human Resources

There are HR implications arising from the proposal. The proposal means that as there is an increase in pupil numbers entering ALN Resource Bases, the schools concerned with new provision will require the Governing Bodies of each school affected to plan for the workforce requirements in readiness for the respective extension.

The Council's Organisational Development Division will provide advice, support and guidance to the Governing Bodies for the workforce planning and consequential recruitment processes. Where the Governing Bodies have adopted the Council's School Redeployment and Redundancy Policy, any new vacancies arising as a consequence of an increase in numbers on roll will provide opportunities for school-based staff on the school redeployment register.

Partnerships

The 'Blaenau Gwent We Want' engagement programme is about local people, businesses and organisations having a say on how we can improve Blaenau Gwent for our future generations. In its 1st year the group have already engaged with over 1,500 people from throughout Blaenau Gwent to find out what they would like the area to be like in the future. Their feedback has been used to help us put together a number of priorities that we will work on over the next few years to help us create the Blaenau Gwent that we all want.

In its second year the Partnership Strategic Board's progress, they have continued to reflect on how we are doing and what we have been focussing on demonstrating that we are an ambitious and learning board. In this respect we have reviewed our programme of work and taken on a number of exciting new projects including ones to address climate change and food inequality.

Looking to the future we will also be taking stock on the impact COVID-19 has had on our communities and what it means for any changes we might need to make on our well-being plan for the area.

Our Well-Being Plan outlines our objectives for improving well-being in Blaenau Gwent and meeting our duties under the Wellbeing Future Generations Act (2015). The 5 objectives in the plan have been developed to reflect that Blaenau Gwent Wants:

- The best start in life for everyone
- Safe and friendly communities
- To look after and protect the natural environment
- To forge new pathways to prosperity
- To encourage healthy lifestyles

These well-being objectives are ones we consider having real power to bring about change, that are the most urgent and that the evidence tells us need the combined force of the Public Services Board partners to deliver and improve well-being.



ESTYN

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise standards achieved by their pupils (Estyn).

Appendix 5 shows the latest Estyn results for the schools included in this proposal along with **Appendix 6** any recommendations.

In terms of this proposal please see an overall assessment below on the core themes from the Estyn inspection framework

Quality and Standards in Education: The quality and standards of schools in Blaenau Gwent are monitored by the Council, in line with the national system of school categorisation and guidance in respect of schools causing concern. Estyn is the Office of Her Majesty's Chief Inspector of Education and Training in Wales and is established under the 1992 Education Act. Standards and the quality of provision are also monitored periodically through the Estyn Inspection Framework for the inspection of schools.

Since 2012, the Council has commissioned the Education Achievement Service (EAS) to support school improvement in Blaenau Gwent's schools. The EAS provide school improvement support to the following Councils: Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen. As part of this proposal, the Council will work in partnership with the EAS to secure increased levels of support for the schools.

Standards: The proposal will not affect the standards in any of the school buildings proposed for resource bases in the County Borough. The schools will continue to receive the appropriate level of challenge and support in terms of their new ALN provision from the Council's Inclusion team as well as the EAS.

Wellbeing and Attitudes to Learning: The provision of additional pupil places in resource bases is expected to enable more children to attend school in their local community. Pupil wellbeing is a priority for the Inclusion team and Council which is monitored and reported via the ALN Panel. The proposal will not impact wellbeing and attitudes towards learning.

Teaching and Learning Experiences: The teaching in Resource Bases proposed in this consultation document will follow the national curriculum with English as the language of teaching and learning. It is also prudent to note that under this proposal the Council will be establishing its first Welsh-medium provision for Welsh learners in Ysgol Gymraeg Bro Helyg which has been identified as a gap previously. This proposal will not impact negatively on teaching and learning experiences.

Care, Support and Guidance: All schools in Blaenau Gwent have highly effective policies and strategies for promoting care, support and guidance that have a strong emphasis on supporting pupils' behaviour, communication and emotional wellbeing. As a result, nearly all pupils behave well and engage enthusiastically in their learning across the County Borough. The proposal can offer an appropriate range of activities that link well to pupils' interests and abilities. The proposal will promote pupils' social, moral, spiritual and cultural development effectively.

The majority of our schools with existing Resource Based provision work closely with external agencies ensuring effective collaboration planning that will support and advise staff about individual pupils' needs. This is also paramount to the new Resource Bases being established under this proposal.

Leadership and Management: The Inclusion Team and headteacher of the proposed Resource Bases will have a clear vision and high expectations for the proposed provision. In current provisions there is clear and effective communication with governors, pupils, parents and staff via the Inclusion Team. The senior leadership teams are and will be effective, understand their roles and responsibilities and undertake their work efficiently.

Impact of the proposal

Should the proposal be approved, it will continue to provide a high-quality learning environment in support of enhanced outcomes for all ALN pupils that require placement in Resource Bases in mainstream settings. The proposal will ensure that the already excellent standards in our current settings will also be maintained. Much research and ALN reform has demonstrated that pupils achieve better outcomes when they are fully engaged in learning and in an environment that is suitable for their needs.

Section 8: Overview of the Proposal

Table 6 below details Phase 1 of the proposal including the category, language, age range and other relevant details in relation to the proposed new ALN provisions:

	New propose	ed Resource Ba	se							
	Ebbw Fawr 3-16 Learning Community – Secondary Phase	Tredegar Comprehensive School	Sofrydd Primary School	Ysgol Gymraeg Bro Helyg						
Admission number and arrangements		o Resource Bases t's Inclusion team								
Age range	11-16	11-16	3-11	3-11						
Pupil places in Resource Base	6	6-8	10	10-15						
Capacity of the school	1191	767	162	215						
Location	Lime Avenue, Ebbw Vale NP23 6GL	Stable Lane, Tredegar NP22 4BH	Sofrydd Road, Sofrydd NP11 5DW	Rising Sun Ind Estate, Blaina NP13 3DQ						
Category school and language	Community English Medium	Community English Medium	Community English Medium	Community Welsh Medium						
Transport arrangements and policy	Transport will be delivered in accordance with the Blaenau Gwe Home to School and Post 16 Transport Policy 2023/24. Please ref to Section ? for more information.									
Cost per Pupil 2021/22	£5,649	£5,591	£5,386	£4,981						

Results of Estyn Inspections	Please see resul	Its and recommend 39 & 7 Pag		dix 6 Page 38-											
Building Condition															
Categorisation															
Building Suitability	А	A/B	С	В											
Categorisation															
Schedule of	Rooms to be determined post consultation and capital investment														
accommodation															

Table 7 below details Phase 2 of the proposal including the category, language, age range and other relevant details in relation to the proposed new ALN provisions:

	New pr	oposed Resource Bas	se	
	Brynmawr Foundation School	Abertillery 3- 16 Learning Community Roseheyworth Road Primary Campus	Faith Based Primary School location	Cwm Primary School
Admission number and arrangements	Admissions to R	esource Bases are co-ore team on the bas		Gwent's Inclusion
Age range	11-16	3-11	3-11	3-11
Pupil places in Resource Base	10	10	10	10
Capacity of the school	820	980 for whole primary sites	n/k	210
Location	Intermediate Road, Brynmawr NP23 4XT	Roseheyworth Road, Abertillery. NP13 1SR	Yet to be determined	Canning Street Cwm, Ebbw Vale NP23 7RD
Category school and language	Foundation English Medium	Community English Medium	Voluntary Aided English Medium	Community English Medium
Transport arrangements and policy		delivered in accordance w ansport Policy 2023/24.		
Cost per Pupil 2021/22	£5,056	£5,449	n/k	£5,837
Results of Estyn Inspection s		sults and recommendation (Page 40		· · · /
Building Condition Categorisation	С	В	n/k	С
Building Suitability Categorisation	С	В	n/k	С
Schedule of accommodation	Rooms to	be determined post cons	sultation and capita	linvestment

School Catchment Area

The Resource Base catchment area covers all of the County Borough. The placement of pupils in bases will depend on the needs of the pupils. This will not change as part of this proposal.

Transition Arrangements

There will be no change for pupils, currently in any of the Resource Bases or Special Schools in the existing county borough bases.

Section 9: Consultation Pro-forma

Consultation Questionnaire

Please provide your comments on the proposal in this consultation document to extend the capacity for pupils in Resource Bases by establishing and changing the ALN provision in a number of Primary and Secondary Schools across the County Borough. You may also wish to indicate which of the following reflects your views:

This can be done in 3 ways:

- 1. Via the link provided electronically via: <u>https://online1.snapsurveys.com/d1daqu</u>
- 2. Via the below proforma and send to: <u>21stcenturyschools@blaenau-gwent.gov.uk</u>

ſ	I fully support the proposal	
	I partially support the proposal	
	I do not support the proposal	
Your comme	ents:	

Name:	Date:
E-mail:	
Address:	Postcode:

Please indicate if you are:

Primary: Teacher/Non-Teaching School Staff / Governor / Parent / Pupil /Local Resident / Other (please state) _____

Secondary: Teacher/Non-Teaching School Staff / Governor / Parent / Pupil /Local Resident / Other (please state) _____

3. Send by mail to Joanne Watts Service Manager - Education Transformation and Business Change, Education Department, Floor 8 Anvil Court, Abertillery, NP13 1DB

Thank you for your time and contribution to the consultation. Your views, comments and responses will be recorded and reported to the Council's Executive Committee in the Consultation Outcome Report.

All comments to be received no later than 5:00pm on Tuesday 6th June 2023

Appendix 1 - Distribution List for the Consultation Document

Parents (and where possible prospective parents) carers and guardians, and staff members of schools affected by the proposals	The Welsh Ministers
In the case of proposals affecting secondary provision, parents of pupils attending primary schools from which pupils normally transfer to that secondary school	Constituency and Regional Assembly Members (AMs) and Members of Parliament (MP's) representing the area served by/intended to be served by any school which is the subject of the proposals
The maintaining or proposed maintaining authority for any school likely to be affected by the proposals	ESTYN
Any other local authority (including those in England where appropriate) likely to be affected – including in the case of dedicated ALN provision, any authority placing or likely to place pupils with ALN in it to distribute to schools in their areas as appropriate	Teaching and staff trade unions (NUT; NASUWT; ATL; UCAC; UNISON; GMB) representing teachers and other staff at any school which is the subject of the proposals
The Church in Wales and Roman Catholic Diocesan Authority for the area in which any school likely to be affected is located	The relevant Regional Education Consortium
Any other appropriate religious body for any school likely to be affected by the proposals	The Police and Crime Commissioner for the area served by/intended to be served by any school which is the subject of the proposals
The Governing body of any school which is the subject of the proposals	Any community or town council for the area served by/intended to be served by any school which is the subject of the proposals
The Governing body of other schools which the proposer consider are likely to be affected by the proposal;	In the case of proposals affecting nursery provision, any independent or voluntary providers who may be affected including Mudiad Meithrin. Also all Registered Private/Voluntary Early Years Settings /Providers in Blaenau Gwent;
In the case of proposals affecting nursery provision, the Early Years Development and Childcare Partnerships where present	In the case of proposals affecting ALN provision, any relevant health or third sector bodies with an interest
In the case of proposals affecting secondary provision, any further education institutions serving the area of the school (Coleg Gwent)	In the case of proposals affecting Welsh Language provision, the Welsh Language Commissioner

In addition to the above, the following are also included in the distribution:

The Headteacher of each school maintained by	Other Directorates of Blaenau Gwent County
Blaenau Gwent LEA	Borough Council
All Elected Members of Blaenau Gwent County	Blaenau Gwent Association of School Governors
Borough Council	
The Careers Service	Libraries
RhAG (Parents for Welsh Medium Education)	SNAP Cymru

			AILT	hrough Sc	hools (3-	16)						Primary	Scho	ola												Secon	danv	Specia	i Scho	ol Pro	noieiv
		Abertil	ery Learn	ing Comm	unity	Ebbw Learni																				School		River & Learni	Centre ng	3-16	
		Secondary Campus	Ros diey worth Road Prên ary Campus	Sk Bels Phrary Campus	Titery Sheet Primary Campus	Primary Rhase	Secondary Phase	AI Shink R.C	Beaufort HB	Blinn y Own	Brynbach	Coed y Gam	CMI	Delghoon	Georgetown	Garhowy	Glynood	Rhosy Fedwan	St Josephe R.C.	StMary CIW	StMary's R.C.	Sofydd	MI OWDOWN	Ying of Gymrang Bro Hely g	Ystruth	Brymmer	Tredegar Compre- hensive	Primery Secting	Secondary Setting	Stewards House	Ren Y Cwm Special School
	Location of School	Eblaw Fach	Ebbw Fach	EblawFach	Ebbw Fach	Ebbw Valo	EllowVale	Ebbw Vale	EbbwVale	Ebbw Valo	Tredegar	Ebiw Fach	Ebwvale	Tredegar	Tredogar	Tredegar	EbbwVale	Ebbw Vale	Tredegar	Ebbw Fach	Ebbw Fach	Eblw Fach	Ebhw Vale	Ebbw Fach	Ebbw Fach	Ebbw Fach	Tredegar	Tredegar	Ebbw Vale	Ebbw Vale	Eldw Vale
School	School Category Community, Voluntary /Controlled /Voluntary Aided/ Foundation	c	c	с	U	ú	ů	VIA	ů	c	c	c	c	c	ů	ü	C C	ů	WA	c	×	c	с	c	c	F	c	ů	c	в	с
	Language English, Weish- medium	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	w	E	E	E	E	E	E	E
	Capacity (Sept 22)	750		980		284	1191	188	210	270	210	210	210	210	420	298	320	177	107	210	210	162	420	215	294	820	767	N/A	N/A	N/A	N/A
	Nursery Capacity (Jan 23)	N/A	45	28	41	58	N/A																			N/A	N/A	NA	NA	N/A	NA
5 = 5	2019					N/A	N/A	179	214	271	192	197	183	164	376	265	265	122	99	207	174	148	381	208	276	701	664	N/A	N/A	N/A	N/A
5 i j	2020	654		176		233	940	176		251	202	175	180	175		251	301	121	93	204	176	142	378		282	655	688	N/A	N/A	N/A	N/A
	2021	705		795		244		177		239	204	160	178	187	388	232		128	97	198	175		389	220	284	620	745			N/A	N/A
2 - 7	2022	699		788		224	1089	176	202	232	200	160	172	195	400	238	293	109	95	208	176	131	398	222	291	559	708	N/A	N/A	N/A	N/A
2	2023	722		780		233	1103		200	240	208	155	175	201	392	248	313	94				120	415		295	564	729	N/A	N/A	N/A	N/A
2 2 2	2024	737		760		228	1119		201	232	194	158	177	205	384	245	281	101				109	406		300	532	749	N/A	N/A	N/A	N/A
100	2025	_		769		221	1122		195	244	195	153	172			245		109				100	417		290	535	772	N/A	N/A	N/A	N/A
· · · ·	2026	735		728		231	1073		198	238	192	169	173	208	_	265	239	119				97	406		298	533	761	N/A	N/A	N/A	N/A
ě.	2027	712		741		238	1019		198	258	180	166	176	202	342	269	216	129				80	403		288	538	784	N/A	N/A	N/A	N/A

Appendix 2 - Summary of schools locations, Pupil Numbers and Projections

Appendix 3 - Schedule of Accommodation Condition Surveys and Facilities overview

		All Through Abertillery L				Ebbw F Learnin Commu	9		Primary Schools										Secon	dary	Special School Provision River Centre 3-16 Learning Community											
		Secondary Campus	Rose heyworth Road Campus	Six Bells Campus		Primary Phase	Secondary Phase	All Saints R.C.	BeaufortHII	Bleen Y Cwm	Bryn Bach	Cond Y Gam	Cwn	Deighton	Georgetown	Gianhowy	Gyncond	Phos-Y-Fedwer	St Highdra	St Joseph's R.C.	St Mary's R.C	StMary's CLW	Sofrydd	Willowbown	Ysgol Gymaeg Brohelyg	Ystruth	Poundation Foundation	Tredegar Comprehensive	Primary Setting	Georgery Setting	S termined a Mora are	Pen Y Cwm Special School
School	Condition Survey	e	B	A	A		A	с	в	в	B/C	в	c	в	в		D*new build open Sept 2024	в	в	в	в	8	в	8	в	BIC	c	в	0	A* just completed remodelling	B	•
	Nursery		1	< -	1	< - 1		1	1	1	1	1	1	< _	1	1	 Image: A second s	1	1	1	1	< - 1		*	1	1						
eling Silte	Classrooms/ Shared teaching areas	1	1	4	1	1	1	1	1	1	1	ł.	1	1	1	1	1	1	1	1	1	1	1	1	4	1	1	1	1	1	i.	4
8	Staffroom	4	4	4	1	4	4	1	4	1	1	4	1	1	1	4	4	1	∢	1	¥ -	1	1	1	4	1	1	*	1	4	1	<
2	Headteachers office	1	1	1	1	4	1	1	1	1	1	1	1	1	1	1	4	\$	1	4	1	1	1	1	1	1	1	< - 1		×		1
1	Reception	4	4	s.	1	s.	4	1	4	¥	¥	4	< -	Υ.	1	1	4	1	< _	\$	1	1	1	Υ.	4	4	*	1		4		<
8	Storage	1	1	< - 1	1	1	4	1	1	∢	₹	1	1	1	1	ł.	¥	1	< _	1	₹.,	4 - C	1	¥ -	<	1	₹	¥	4	4		¥
Facilities	Multi-purpose use/Hall	1	1	1	1	1	1	1	1	1	1	1	ł.	1	1	1	1	1	1	1	*	1	1	*	1	1	1	1		1		1
<u>e</u>	Kitchen	1	1	1	1	1	1	1	1	∢	4	1	< .	< -	1	ł.	 Image: A second s	1	∢	1	1	<	1	1	1	1	< .	1		1		¥
	Cloakroom		1	<	¥			1	< -	1	∢	1	< - 1	< _	1	4	 Image: A second s	1	< _			<	1	₹	1	₹		< - 1				<

33 | Consultation document: Proposal to Improve provision and build capacity for Additional Learning Needs (ALN) Pupils across the County Borough

Appendix 4 – ALN Resource Base Community Impact Assessment

Community Impact Assessments are a structured way for the Council to fully understand the implications of our decisions and whether they are detrimental or discriminatory to certain groups or sections of the community. They help us to consider the impact of Council decisions and policies within and between communities more generally. The Community Impact Assessment process will ensure that our decision-making process is robust and impacts on all communities within Blaenau Gwent ensuring that they are fully considered in Council decision making processes. By carrying out impact assessments, the Council is working to promote equality for all our service users, employees and the wider community that we serve.

There are 7 Resource Rases in the County Borough. For ease of information they have been split into the three distinct valleys.

Ebbw Fawr area	Ebbw Fach area	Tredegar area
 Ebbw Fawr 3-16 Learning Community – Secondary Campus Willowtown Primary School 	 Abertillery 3-16 Learning Community Six Bells Primary Campus and Secondary Campus Ystruth Primary School Coed y Garn Primary School 	 Glanhowy Primary School

The Welsh Index of Multiple Deprivation (WIMD) updated in 2019 analysis and describes the patterns seen in Wales between different deep-rooted deprivation categories.

The Proportion of young children in income deprivation in each local authority, trend overtime from 2012-2013 to 2016-2017 <u>Welsh Index</u> of <u>Multiple Deprivation 2019</u>: deprivation analysis relating to young children | GOV.WALES shows that in Blaenau Gwent 2012/13 there was an average of 41 children in comparison to 2016/17 of 37 this is still significantly higher that the Welsh Average of 30 in 2012/13 and 28 in 2016/17. The proportion of young children in income deprivation in Wales decreased year on year from 30% in 2012-13 to 27% in 2015-16, however the deprivation rate has since increased slightly to 28% in 2016-17.

Proposed Development:

If approved the proposal would secure an additional 43 places for pupils in phase 1 alone requiring a place in a Council run Resource Base. Phase 2 could see another potential 30 places in primary and 10 in secondary settings. The increase would bring significant benefits to current and new pupils requiring placements along with benefits for the wider community and families of pupils having closer provision available to them.

Proportion of Pupils:

The Council's proposal seeks to ensure a continued high quality learning environment for pupils that require ALN provision, by extending the capacity of mainstream setting Resource Bases in order to cater for many of the County Borough's pupils who are/or would otherwise be placed Out of County in line with their needs and/or availability and sufficiency of pupil places. The chosen locations have been decided on mainstream school building capacity to locate resource bases across the borough and the need for more ASD resource in the River Centre 3-16 Learning Community Secondary setting.

There are approximately 2 pupils from outside the County Borough being educated at primary and secondary Resource Bases in the County Borough. This represents less than 2.2% of the total allocation of places with the majority of its pupils, residing within Blaenau Gwent. Future availability of places for "out of county" pupils will be subject to demand from within Blaenau Gwent in the first instance.

Current facilities and/or services offered:

As part of the consultation document there is a full list of facilities recorded against all school that will be affected by the proposal. In forming Resource Bases there will be an added component for a sensory room as part of each Resource Base developed.

Travel Time:

Given the proposal is to remodel rooms on existing mainstream sites there will be no impact on travel distances for existing pupils. As the catchment area for ALN places covers the entire County Borough, the maximum distance likely to be travelled is no more than 8 miles, approximately 20 minutes by car/bus. Distances/travelling times will increase for those pupils with a placement from further afield.

How would parents' and pupils' engage should the proposal be agreed?

The Council recognises the importance of an effective and smooth transition process to ensure there is little, if any disruption should the proposal to expand capacity of Resource Bases in its mainstream setting and River Centre 3-16 Learning Community setting be approved. The Inclusion team will form part of the project team to collaboratively contribute to the overall development of new provisions.

Parents/carers and pupils will be provided with relevant information to aid their understanding of the proposal and the most appropriate support they can offer their children during the period of transition. The Inclusion team and school representatives will also work together with other services and where necessary, in identifying families who may need additional support. Parental and community engagement will remain a key priority throughout this process.

The wider implications the changes would have on public transport provisions:

The proposal is not expected to have any significant implications for public transport provision in the area given pupils' transport is largely provided by contracted vehicles.

Wider community safety issues:

The proposal would have no direct impact on the wider community, places in Resource Bases will be offered to meet pupils needs.

- The existing Resources Bases will remain in their current locations.
- It will benefit families of pupils who require ALN Resource Base places by their child having the education within the County Borough within which they reside.
- No significant safety issues are anticipated.

What would be the impact on health and well-being?

With the creation of additional Resource Bases it will positively impact on pupil's health and wellbeing. With smaller numbers in the classrooms the focus is on pupils and their needs, so the proposal will have a very positive impact on the health and wellbeing of those who attend, who will have access to the highest standard in terms of facilities, education and care.

Transport Impact Assessment:

The Learner Travel (Wales) Measure 2008 places a duty on the Council to assess the travel needs of pupils under the age of 19. In addition to those pupils who qualify for free transport provision due to meeting the eligibility criteria, the Council is under a legal obligation to assess the travel needs of pupils who walk to school. There will likely be an impact upon transport and travel, however, any implications on transport arrangements will be more positive than if the Council were to use provision from outside of the Borough to meet the pupil's needs.

Staff Impact Assessment:

There will be no impact on existing staff albeit the increase in capacity in new Resource Bases may provide new and different opportunity to recruit additional staff. Nevertheless, in addition to their role as statutory consultees, meaningful consultation will take place with any affected staff and recognised trade unions on the possible impact and outcome of the statutory consultation. Discussions will take place through agreed joint consultative processes with recognised trade unions (JCC) and collective consultation.

Additional Learning Needs Provision:

This proposal specifically addresses sufficiency issues in relation to the number of places available for pupils with ALN in the Borough and will therefore, have a positive impact.

School & date last inspection	Key Question are outcomes		Key Question 2	2: How good is p	rovision?			Key Question 3: How good are leadership and management?								
	Standards	Wellbeing	Learning experiences:	Teaching:	Care, support and guidance:	Learning environment:	Leadership:	Improving quality:	Partnership working:	Resource management:						
Abertillery 3-16 Learning Community 2018 inspection	Adequate needs improvement	Adequate needs improvement	Adequate needs improvement	Adequate needs improvement	Adequate needs improvement		Unsatisfactory and needs urgent improvement									
Coed Y Garn Primary School 2022 Report	Good	Good	Good	Good	Good	Good	Good	Good	Good	Good						
Glanhowy Primary School 2018 Report	Good	Good	Good	Good	Good		Good									
Willowtown Primary School 2017 Report	Adequate	Good	Good	Good	Good	Good	Good	Good	Good	Adequate						
Ystruth Primary School 2017 Report	Good	Good	Good	Good	Good	Good	Good	Good	Good	Good						
Ebbw Fawr 3-16 Learning Community 2016 Report	Good	Unsatisfactory	Good	Adequate	Unsatisfactory	Good	Adequate	Adequate	Good	Adequate						

Appendix 5 -Estyn Inspection results

Tredegar Comprehensive School 2016 Report	Good	Excellent	Good	Good	Good	Excellent	Good	Good	Excellent	Good
Ysgol Gymraeg Bro Helyg 2020 Report	Good	Good	Good	Adequate	Good		Good			
Sofrydd Primary School 2016 Report	Good	Good	Good	Good	Good	Good	Good	Good	Excellent	Good
River Centre 3-16 Learning Community Secondary Campus 2022 Report										
Brynmawr Foundation School 2019 Report	Unsatisfactory and needs urgent improvement	Unsatisfactory and needs urgent improvement	Unsatisfactory and needs urgent improvement	Unsatisfactory and needs urgent improvement	Adequate and needs improvement		Unsatisfactory and needs urgent improvement			
Cwm Primary School 2020 Report	Good	Good	Good	Good	Good		Good			

Estyn Reports via links:

Abertillery 3-16 Learning Community - ALC Estyn Report 2018	Tredegar Comprehensive School- Tredegar Comp Estyn Report 2016
Coed y Garn Primary School - <u>Coed -y- Garn Primary Estyn Report</u> 2022	Brynmawr Foundation School - Brynmawr Foundation Estyn Report 2019
Glanhowy Primary School - Glanhowy Estyn Report 2018	Sofrydd Primary School - Sofrydd Estyn Report 2016
Willowtown Primary School- Willowtown Estyn Report 2017	River Centre 3-16 Learning Community - The River Centre Estyn Report 2022
Ystruth Primary School- <u>Ystruth Estyn Report 2017</u>	Cwm Primary School- Cwm Primary Estyn Report 2019
Ebbw Fawr 3-16 Learning Community - EFLC Estyn report 2016	Ysgol Gymraeg Bro Helyg - Ysgol Bro Helyg Estyn Report 2020

School	Recommendations for Improvement:
Abertillery 3-16	R1 Improve standards, in particular outcomes at the end of key stage 4.
Learning	R2 Improve standards of behaviour in the secondary phase.
Community	R3 Improve the quality of teaching.
	> R4 Improve planning for progression of skills, including the Welsh language, and the breadth of the secondary phase curriculum.
	R5 improve the quality and impact of leadership at all levels, including in self-evaluation and planning for improvement.
	R6 Provide robust financial management to address the deficit budget.
Coed Y Garn	R1 Address the issues related to the school site, identified at the time of the inspection
Primary School	R2 Challenge all pupils through consistent and effective teaching
	R3 Ensure that teachers provide opportunities for extended independent writing
	> R4 Ensure that teachers' feedback moves individual pupils on to the next stage in their learning effectively
Glanhowy Primary	R1 Improve spelling and standards of handwriting.
School	R2 Raise standards in use of oral Welsh.
	> R3 Ensure that pupils understand more clearly what they should achieve during lessons in key stage 2.
	R4 Ensure assessment is consistent and accurate when judging higher levels of attainment.
Willowtown	R1 Improve standards of reading and writing.
Primary School	R2 Improve standards in Welsh.
	R3 Provide pupils with opportunities to develop their numeracy skills in subjects across the curriculum.
	R4 Share best practice in teaching and learning across the school more effectively.
	R5 Ensure that there is appropriate and effective use of the pupil deprivation grant.
Ystruth Primary	R1 Improve pupils' competence in speaking Welsh.
School	R2 Provide further opportunities for pupils to apply their numeracy skills across the curriculum.
	R3 Improve the balance between child-initiated and adult-directed activities in the Foundation Phase
	R4 Improve the clarity of targets within individual education plans to better meet the requirements of pupils with additional learning
	needs.
Ebbw Fawr 3-16	R1 Improve the implementation of the school's procedures for safeguarding pupils' wellbeing in the secondary phase, by dealing
Learning	effectively with any incidence of bullying.
Community	R2 Improve pupils' independent learning and oracy skills in the secondary phase.
	R3 Improve the quality of teaching, especially in the secondary phase.
	R4 Ensure that self-evaluation and improvement planning draw on the whole range of evidence gathered by the school.
	R5 Reduce the rate of fixed-term exclusions in the secondary phase.
l l	R6 Ensure that the school meets requirements for the daily act of collective worship in the secondary phase.

Appendix 6 – Estyn Inspection Recommendations

Tredegar	R1 Improve standards in English at key stage 4.
Comprehensive	R2 Ensure that all self-evaluation activities focus consistently on pupil standards and progress.
School	
Ysgol Gymraeg	R1 Ensure that teaching and learning experiences develop the independence of all pupils in the foundation phase consistently.
Bro Helyg	R2 Improve provision to develop pupils' ICT skills across the school.
	R3 Strengthen self-evaluation and planning for improvement procedures in order to prioritise and address the most important areas.
Sofrydd Primary	R1 Improve pupils' spelling, punctuation, handwriting and the presentation of their work.
School	R2 Develop the roles of the school and eco councils by giving members more responsibility.
	R3 Improve opportunities for pupils in the Foundation Phase to choose activities and to develop more independence in their learning.
	R4 Improve opportunities for older pupils to read in Welsh.
River Centre 3-16	R1 Address those issues identified in the health and safety letter.
Learning	R2 Establish a clear purpose and vision for the school and implement a staffing structure that is fit for purpose and adequately reflects
Community	roles and responsibilities.
	R3 Ensure that the curriculum is sufficiently engaging, broad and balanced and prepares pupils well for their next stage in life and
	learning.
	R4 Improve the behaviour of pupils, particularly on the secondary campus.
	R5 Improve the quality of the learning environment and culture, particularly on the secondary campus
	R6 Improve the outcomes for pupils, particularly those on the secondary campus.
	R7 Establish systems, procedures and routines across the school that are clearly understood by staff and relevant partners.
Brynmawr	R1 Improve pupils' standards across the school, including their literacy and numeracy skills.
Foundation School	
	R3 Improve the effectiveness of teaching to motivate, engage and challenge pupils to make good progress in lessons.
	R4 Strengthen leadership at all levels to improve leaders' ability to identify areas for development and to plan effectively for
	improvement.
Cwm Primary	R1 Ensure that pupils in the foundation phase have meaningful opportunities to develop as independent learners.
School	R2 Ensure that teachers match activities to the needs of pupils of all abilities, particularly the least able.
	R3 Improve the quality of presentation, spelling and punctuation in key stage 2.

Parents (and where possible prospective parents) carers and guardians, and staff members of schools affected by the proposals	The Welsh Ministers
In the case of proposals affecting secondary provision, parents of pupils attending primary schools from which pupils normally transfer to that secondary school	Constituency and Regional Assembly Members (AMs) and Members of Parliament (MP's) representing the area served by/intended to be served by any school which is the subject of the proposals
The maintaining or proposed maintaining authority for any school likely to be affected by the proposals	ESTYN
Any other local authority (including those in England where appropriate) likely to be affected – including in the case of dedicated ALN provision, any authority placing or likely to place pupils with ALN in it to distribute to schools in their areas as appropriate	Teaching and staff trade unions (NUT; NASUWT; ATL; UCAC; UNISON; GMB) representing teachers and other staff at any school which is the subject of the proposals
The Church in Wales and Roman Catholic Diocesan Authority for the area in which any school likely to be affected is located	The relevant Regional Education Consortium
Any other appropriate religious body for any school likely to be affected by the proposals	The Police and Crime Commissioner for the area served by/intended to be served by any school which is the subject of the proposals
The Governing body of any school which is the subject of the proposals	Any community or town council for the area served by/intended to be served by any school which is the subject of the proposals
The Governing body of other schools which the proposer consider are likely to be affected by the proposal;	In the case of proposals affecting nursery provision, any independent or voluntary providers who may be affected including Mudiad Meithrin. Also all Registered Private/Voluntary Early Years Settings /Providers in Blaenau Gwent;
In the case of proposals affecting nursery provision, the Early Years Development and Childcare Partnerships where present	In the case of proposals affecting ALN provision, any relevant health or third sector bodies with an interest
In the case of proposals affecting secondary provision, any further education institutions serving the area of the school (Coleg Gwent)	In the case of proposals affecting Welsh Language provision, the Welsh Language Commissioner

In addition to the above, the following are also included in the distribution:

The Headteacher of each school	Other Directorates of Blaenau Gwent
maintained by Blaenau Gwent LEA	County Borough Council
All Elected Members of Blaenau	Blaenau Gwent Association of School
Gwent County Borough Council	Governors
The Careers Service	Libraries
RhAG (Parents for Welsh Medium	SNAP Cymru
Education)	

This page is intentionally left blank

Appendix 3 – Demand Analysis Table - Pupil projections based on current numbers: Pupil projections for resource bases at Primary

	Baseline Data		5 Yea	rs Projec	tions				
Primary	22/23	23/24	24/25	25/26	26/27	27/28			
Places available	61	61	61	61	61	61			
Places taken	62	60	63	64	65	67			
Leavers	15	10	12	11	11	11			
Joiners next year	13	13	13	13	13	13			
Total at start of next year	60	63	64	65	67	69			
Amount over capacity - demand	-1	2	3	4	6	8			

Pupil projections for resource bases at Secondary

	Baseline Data	5 Years Projections - based on Year 6 pupils				Year 6
Secondary	22/23	23/24	24/25	25/26	26/27	27/28
Places available	62	62	62	62	62	62
Places taken	66	77	74	69	60	61
Leavers	6	13	17	20	12	17
Joiners next year	17	10	12	11	13	13
Total at start of next year	77	74	69	60	61	57
Amount over capacity	15	13	9	-3	-2	-6
Ebbw Fawr transition group	6	6	6	6	6	6
Amount over capacity - demand	9	6	1	-8	-7	-11

Note

This doesn't take into account potential transfers from Out County placements or the Council's Special Schools

Page 58

EDUCATION DIRECTORATE BLAENAU GWENT

Consultation events: ALN Resource Base Provision

JCC Meeting via Teams Wednesday 26th April 2023 12:00pm via Microsoft Teams

		Question	Answer
	1	Will you need to recruit staff for these positions and what are the implications on Staffing costs?	Staff will be recruited by the school, in the short-term an ALN grant is in place to pay staffing costs, however in the long-term it is envisaged that this cost will be offset with the reduction of Out of County (OOC) placements.
Page	2	This consultation seems to come out of nowhere and the focus seems to be reduction of OOC places. Surely there are more ways to do this via support for schools	All the LA's resource bases are full to capacity, to insure we meet the needs of pupils now we have to implement phase 1 accommodating secondary ASD in Tredegar and recognizing the Transition group already established in Ebbw Fawr 3-16 Learning Community – Secondary Phase and provide parity for learners in Welsh-medium school to access resource base. As well as this consultation there is a mapping exercise being undertaken with schools to review what provision they have (such as nurture spaces/sensory rooms) so that
Je			we can support all schools.
59	3	How young are you suggesting starting the provision at?	There is specialist support for Foundation Phase currently in Special Schools, we are targeting the Key Stage 2 upwards as that is where the demand is in phase 1.
	4	Fully support the plans and roll out of this consultation but can you tell us why these schools have been taken for consideration?	The feasibility started with what schools had capacity to host a provision, where the demand was, the gaps in provision and the demographics. The longer term aim is that local provision will be developed which will contribute to reducing the carbon footprint further.
	5	Will there be any specific professional development for staff who would consider become a resource base teacher?	The Inclusion team will work with schools, ALNCos and teachers to provide support and professional development for staff creating good practice.

People and Education Scrutiny group – Friday 28th April 2023 12pm via Microsoft Teams

		Question	Answer
	1	Just an observation, this development is really timely, increasing the support for vulnerable learners. Looking at the consultation there is a fair geographical spread with inclusive practice for faith provision.	This is very assuring response that we are doing the right thing for our learners.
	2	Echo the comments above however there are a few things in the consultation document I didn't understand. Such as phase 1 number of places? Why not create more?	The numbers included in phase 1 places are based on available space in the school, and what the school stated would be suitable.
		And why do you say in one part of the document that there are 60 places and in another part of the consultation document you refer to 66 places.	There are 60 places available in our resource bases and these are all taken, the 66 places includes the 6 places in the Ebbw Fawr 3-16 Learning Community Secondary Phase transition group which will also be recognised under this proposal.
Pane	3	Does this mean that some of the Out of County places will be supported locally?	There is an immediate demand for secondary provision. The rational is that we want BG learners educated in BG. It will also depend on the needs of individuals as some OOC provision is a specialized area of expertise.
RD RD	4	The provision is much needed and will be good for learning and parents to accommodate children with ALN into their local school community. It will also make for a smoother transition into college. This has been needed for years and I am pleased that it will now happen.	Again this is very pleasing to hear, there has been a lot of preparation and feasibility work being carried out prior to consultation to ensure we have the right approach Phase 1 is where the need is and Phase 2 can shape the future of ALN.

Youth forum Meeting via Teams Tuesday 11th May 6:00pm via Microsoft Teams (cancelled rescheduled for Monday the 5th June 2023

No questions

This page is intentionally left blank

Name of Consultation: ALN Review Consultation

Redacted Log of Correspondence





	County Borough Council Llywodraeth Cy County Borough Council Llywodraeth Cy Welsh Governm	
	Query/comment	Actioned
1	Estyn's response to the proposal to improve provision and build capacity for pupils with additional learning needs (ALN) across Blaenau Gwent county borough.	Recorded
	Introduction	
	This report has been prepared by His 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 that 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 its opinion only on the overall merits of school organisation proposals.	
Dane 63	Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.	
ה ע ע	Summary/Conclusion	
	Blaenau Gwent County Borough Council proposes to increase the capacity for ALN and ASD Resource Bases across the county borough in some primary and secondary schools. This will include establishing and changing ALN provision in a number of primary and secondary schools in the county borough. The proposal is to increase ASD and ALN places from 61 to 86 across primary schools and increase provision in secondary schools from 62 to 80 places in Phase 1 (including 15 Welsh-medium places). Furthermore, the proposals include the potential to increase places by a further 40 places in Phase 2 (including Faith-based provision). This will take effect on a phased basis from September 2023 over the next 5 years.	
	Estyn is of the opinion that this proposal is likely to at least maintain the standard of provision, with the possibility of improving access to provision in the short and medium term.	
	Description and benefits	
	The council has provided a clear rationale for the proposal. It has outlined the most up-to-date information about the capacity of each primary, secondary and specialist setting. Overall, this information shows that current provision is running over capacity. Future projections, based on patterns in trends over time, show an increase in demand over the next few years. This proposed increase in capacity would meet the increase in numbers. During phase 1, the proposal addresses the need to increase Welsh-medium provision in the county.	

The council also provides outline information about any capital investment to improve resources and adapt the current accommodation. This has been costed roughly in a table, but there could be more detail explaining how the council arrived at these estimates. However, there is a lack of detailed information on how the council arrived at cost estimates for capital investment and increased revenue expenditure. Similarly, reference is made to an increase in revenue expenditure and the possible effect on recruitment, but more information could be included about the way in which the council will ensure the correct staffing levels over time. The projections give good consideration to any costs for providing for pupils out of county and, similarly, any income from accommodating pupils from other counties. A forecast of transport costs has been provided appropriately.

The council has provided sufficiently detailed descriptions of the proposals and the projected timetable for statutory procedures and implementing the proposal. However, it does not detail the precise actions that will be needed to meet the implementation, particularly when action is required in September 2023.

The potential advantages and disadvantages of the proposed changes have been outlined appropriately. The advantages include:

- Pupils will have access to suitable and appropriate provision within their local area;
- Pupils will have access to suitable and appropriate provision in terms of protected characteristics e.g., faith or language;
- Creation of a local solution which will address the increased demand for ALN provision;
- Continuity and sustainability in terms of local education for pupils with ALN;
- The structure will build confidence and self-esteem in pupils, parents and staff;
- A local option for pupils transitioning from mainstream school to resources bases;
- Reduce the costs of out of county placements for pupils, whilst securing local investment within the Blaenau Gwent school estate;
- Improve access to and facilities for pupils who meet the criteria for ALN provision across the county borough;
- · Increased capacity and sustainability of placements; and
- Reduced travel time and carbon footprint for pupils

The potential disadvantages include:

Page 64

- Potential parental concerns in relation to placement in Resource Bases; and
- Pupil numbers in schools identified as potential bases may grow if there is any inward migration into the area.

The council has identified the potential disadvantages and risks appropriately and it appears that is has outlined some appropriate mitigation measures.

The council conducted an evaluation of the potential options to meet the requirements and broad details are provided in the consultation document, alongside conclusions and decisions. It identifies reasons for rejecting any proposal and why this is the preferred proposal.

The council has given clear consideration to pupils' travel arrangements as a result of this proposal. It has committed to ensuring that all pupils have fair access to the home to school transport policy. The council states that this proposal will not have a detrimental effect on pupils' travel arrangements.

Educational aspects of the proposal

The council has given suitable consideration to the effect of the proposal on standards; well-being and attitudes to learning; teaching and learning experiences; care, support and guidance; and leadership and management. It has come to the conclusion that the plan will continue to provide a high-quality learning environment for pupils and that standards will be maintained.

We feel that this aspect could be strengthened by considering the following:

• Highlight how the council and the school improvement partner will ensure that there is no effect on the standards of all pupils, particularly in the schools that need to raise standards

• Highlight how the council will ensure that there is no negative effect on well-being and attitudes to learning, particularly in schools that need to improve aspect of well-being

• Highlight how leaders intend to ensure the staffing levels that are needed for the increase in capacity and to maintain the quality of experiences

• Highlight how these members of staff will be trained appropriately to work with a complex cohort of young people, particularly in schools that need to improve aspects of teaching

Highlight the way that leadership capacity will not be affected negatively by these changes, particularly in schools that need to improve aspects of leadership. Overall, the document does not provide sufficient detail about any specific work or support that the council will need to provide to the individual schools in the plan.

Although the consultation focuses on provision for ASD or ALN pupils, it is not clear whether the changes will mean a change of setting for the current pupils. In this case, the effect of this on individual pupils will need to be considered, and steps should be outlined to mitigate any disruptions to their learning and well-being during the transition.

The council has conducted an equality impact assessment and came to the conclusion that the proposed changes will not have a negative effect on any particular group in society. An up-to-date link to the report has been provided. However, it would be beneficial to provide further details on the quality assurance process and any specific measures taken to address potential inequalities or challenges.

The council states that a community impact assessment was conducted for these proposals and broad details of the findings have been provided in the document. It is noted that no negative impact on the community is anticipated as a result of the proposal.

The council states that it does not anticipate any negative effect from the proposal on any local school and, on the contrary, that it will be a positive change for pupils. This appears to be a reasonable and fair statement.

Consideration should also be given to the potential growth in pupil numbers in schools identified as potential bases due to inward migration into the area. Appropriate planning and resources should be in place to accommodate increased demand without compromising the quality of education provided.

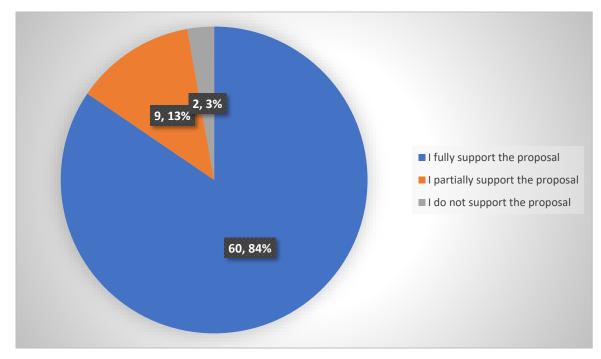
	In addition and in line with the school organisation code, the council has given appropriate consideration to the effect of the proposal on inclusion and the quality of the learning environment.	
2	Firstly, the consultation in the proposal is fully supported by Home to School Transport. However, from the Councils Procurement section it was felt that we needed to record the following risk.	Recorded
	Since Covid there has been a reduction in the number of operators available to undertake Home to School Transport contracts. This shortage has been experienced not just by Blaenau Gwent but all Council's throughout Wales. As such there is a high risk the Home to School transport section may not be able to procure the additional transport required to undertake the conveyance of pupils to the additional ALN settings as outlined in the survey.	
3		
4		
5		
6		
7		
1 09		
¢g₀		
ge		
0		
ð		

Correspondence received after the consultation period finished

	Da	ate	Name and contact details	Query/comment	LA rep	Date & Time	Response	Actioned
1								
2								

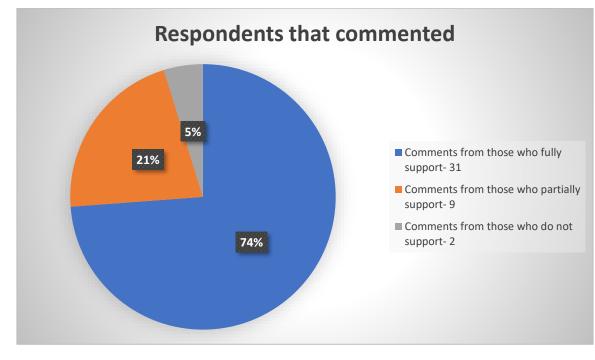
The formal consultation concluded on Tuesday 6th June at 5pm. The below analysis provides information on the 71 respondents that completed this questionnaire.

1. The chart below captures the views of individuals who fully support, partially support and do not support the proposal.



It is encouraging to see that the majority of respondents over 84% (60) fully support the proposal, with an additional 13% (9) partially supporting the proposal.

2. When respondents were asked to record comments, out of the 71 above there were only were 42 (59%) that commented and 29 (41%) respondents that did not comment. After analysis it is interesting to note that all 29 responded that didn't comment are in full support the proposal.



2.a The chart below shows the percentage of respondents out of the 42 that shared comments on the proposal.

Page 67

It is important to note that over 74% of comments received from respondents are in full support of the of the proposal.

3. The below comments from recipients have been split into 3 categories, those who fully support the proposal, those who partially support and those who do not support the proposal.

Comments of those respondents who fully support the proposal.

- 1. There are not enough ALN spaces to cater for every child that needs it and as a result children are not always having their needs met. I fully support the proposal.
- 2. In the documentation I see no information about resources being taken away or having an adverse effect on any of the schools and with that knowledge support the proposal
- 3. It is important to have a geographic spread across Blaenau Gwent to enable pupils to attend a facility close to home. All effort should be made to ensure that they can move on to a secondary school that is close to their home and primary school so that their friendship group can stay together. The proposals seem to do this.
- 4. There is a significant need for ALN provision within the education sector to cater for pupils with ASD/ALN that are not profound enough for specialised provision.
- 5. I fully support the proposal of this, as there are many children within the mainstream classes who are in desperate need of the additional support that they cannot currently receive due to lack of resources and full resource bases within schools. There are many children in both primary and secondary who would benefit from this within Blaenau Gwent
- 6. More available places can only be good news for children of Blaenau Gwent. Very encouraging to see another base for secondary children with ALN.
- 7. My daughter is needing to go to a new primary school for ALN. When my daughter is old enough its only Abertillery comp that will except her for her complex needs. We need more secondary schools for children with complex needs.
- 8. I support the proposal to increase provision for ALN pupils, however If we have a consultation on these suggested proposals how are works already being carried out on sites. For e.g., a member of staff has been appointed already to run the provision at Tredegar Comprehensive, before the results of consultation are back. What if all these proposals aren't supported?
- 9. This is a must for everyone, everybody should be given equal opportunities to learn and also be able to this at their local schools.
- 10. I think this would be an excellent move to give extra help to the children.
- 11. There are definitely children that need this extra help, there seems to be a lot more children presenting with problems nowadays, I fully support and hope it has the go ahead.
- 12. The importance of a secondary facility in Tredegar is so important given the primary unit in the town is having outstanding results. This will offer a smoother transition into secondary education for all of their pupils.
- 13. With so many of the ALN Resource Bases at full capacity, increasing capacity would be highly beneficial. Adding more provision for ASD will ensure more learners will be able to access learning in the correct setting with highly skilled staff and with staff to learner ratios more fitting to their needs.
- 14. Much needed provision.
- 15. I believe this is a great proposal for all schools, there should be more done to help those who require ALN. I hope there will be more spaces to be given at ALC secondary campus. From first-hand experience i have seen how the short supply in the system effects the children physically and mentally and for each child to reach their potential they need the right support in the right areas
- 16. There is not enough provision in Blaenau Gwent to support the children with ASD and ALN. Children are struggling in mainstream as the spaces currently are not available. They have to travel across the borough to access the few spaces that are available. The transition

from primary to secondary spaces needs to be seem less for these children. These spaces are needed now not in 6 years' time.

- 17.1 think this is fantastic for the kids with my child in Brynmawr comprehensive school now and uses ALN a lot making a bigger faculty for kids like him would be great, as a mum of 5 i want my son to stay in a mainstream school to achieve all his goals and hopefully this would help a bit more.
- 18. Following my experience with my son there is a lack of specialist provisions for children with behavioural issues. Following my own experience, the specialist provisions set in mainstream schools are failing the children drastically. Since moving to the Riverside Centre there has been little or no issues with my son.
- 19. The proposal also needs to include support for children with behavioural issues and trauma within the mainstream school system in Blaenau Gwent. We are seeing an increase in children with BESD, Trauma and anxiety after Covid. Inclusion is a wonderful thing but when whole classes are being affected for years by the emotional needs of another in the class something needs to be done. As a school we are putting everything at our disposal to support children with ALN but it's not enough. We have children that have experienced trauma and need experienced trained staff. Impossible to find. They need access to a quiet space in a school that is fighting for space. Whole classes are regularly moved outside and learning experiences ruined as it's the only option when a child is so upset, they are throwing furniture around the classroom. We do not have space for a nurture/sensory room, we are using cupboards! Referrals to panel aren't successful because panel cannot offer anything more they can only say follow the school based idp and review. We do not want to request change of placement for these children, they are part of our school and if we did there are no spaces. We are at breaking point!
- 20. It is essential for pupils to receive the best education possible, and this means offering a more specialised provisions for learners who are struggling to cope in mainstream school. There are increasing pressures on schools who are trying to support pupils to the best of their abilities however there are barriers to learning for some pupils with ALN and there are no alternative provisions for these pupils. Parents are also having to decide against Welsh medium schooling in order to receive a more suitable education. ALN provision should be available in both Welsh and English, parents shouldn't have to choose to remove their children from Welsh education due to lack of provisions.
- 21. We also need provision for Welsh Medium Schools.
- 22. I believe this would be a valuable improvement across the county.
- 23. There is not enough provision for ALN in the county.
- 24. I think it is needed in the area as ALN is growing.
- 25. Improvement is desperately needed with more capacity for the growing number of students with ALN.
- 26. More provision will help children to attend local schools, and to be in the same schools as their siblings. This will be better for children and parents.
- 27. More ASD/resource base support is required for the increasing needs evident in mainstream and it is promising to see that phase 1 and phase 2 cover a diverse range of schools across both primary and secondary phases.
- 28. There is an immediate need for a significant increase in the provision of ALN facilities for Welsh-medium learners within Blaenau Gwent and I think the proposals, whilst welcomed, are coming too late given the current timescales.
- 29. There is a lack of Welsh-medium provision for ALN learners in the county and the situation is now reaching a point where Bro Helyg is unable to cope with a number of intensive needs children within normal classes that are large in size. Although I have noted that September 2024 is fine, I now feel strongly that it is necessary to open in January or Easter 2024 as there is no place for Welsh-medium children anywhere else in Blaenau Gwent.

- 30. It's definitely needed to increase capacity in different schools so that children from their local area attend the correct school for them. There is such a big need and lots of. Children with these additional needs.
- 31. I feel that schools don't have enough resources ie. Funding to fully support all children with additional needs & this is affecting their education & will cost more in the long run as these children will need help for later in life.

Comments of those respondents who partially support the proposal.

32. While I welcome the proposal to create these extra provisions in ASD/ALN places in the schools in the borough it shows how out of touch the council is with the situation of ASD/ALN in the community. In my daughter's class there is 4 children with ASD/ALN either diagnosed or going through assessment at this time. These places will by no means meet the need that there is in our community and the council need to look at providing much more resources for the children in our community. While we welcome the provision and support of Welsh language schools there seems to be too much focus on this than spending on supporting children with ASD/ALN this needs to change or we are going to end up with a generation of children being left in the side-lines without the education support they require to make the best of their lives. This support needs to be led by the Welsh Government and followed up by the councils throughout Wales.

33.1 am interested in finding out how schools of religious character, particularly VA schools, fit into the proposals.

34.There needs to be clarification around ASD/ALN - the range of ALN and specific needs is vast and cannot be met in the same base or setting. To focus on ASD, there is also the danger that there will be the assumption that a diagnosis of ASD will automatically necessitate a specialist setting; this is not the case. There is a definite need for an Early Years specialist setting, to determine the needs of pre-statutory age children, prior to determining the correct setting for them as they commence statutory schooling. Post-Covid, across the LA, we have seen an increase in the numbers of CYP experiencing significant issues with SEMH and SEBD so there is possibly also a need for further nurture-specific specialist settings. Great to see the plans for a Welsh medium SNRB. However, until the second Welsh medium school opens and grow, there is the risk that as the number of Welsh-speaking CYP with and ALN requiring ALP at any given time could fluctuate, there could be 'spaces' available whilst there are other CYP awaiting specialist placement. For this reason, it may be prudent (and equitable) to consider making the Base bi-lingual in the first instance.

35. My son attends Ebbw Fawr resource base it is exceptional the lack of ks3 ASD provision is a massive issue I work in a primary school and the number of children with ASD is increasingly continually I think that the existing children should stay put at Ebbw Fawr established as it would be detrimental to their education and a new provision provided wherever possible to meet the needs of the children coming through one that will take the ever increasing demands

36. I think that early years (2 years on) should be a focus and each town in Blaenau Gwent should have an ALN early years provision to help children to be able to help children be able to be in a school environment early intervention is key and more children are diagnosed from 1 year. My son was diagnosed at 18 months. Having an early year's provision will open spaces to pen y cwm as some children will be given the tools to cope with mainstream school and it will allow children who need the placement in a specialist provision to have it. I was also surprised that when Autism Day came not one school in BG that I looked at held anything for it my sons school included so I looked at other school's websites talked to parents and nothing. Building awareness having schools involved and teachers and pupils to understand how complex autism is. They wear odd socks for down syndrome shouldn't something be done for Autism.

37.I support the proposal only if adequate funding is made available to provide extra staff with the relevant qualifications and expertise and also that it is recognised that children with ALN can have very different needs to children with ASD.

38. The proposals for Phase 1 are well thought out and strive to provide an effective means of meeting the immediate needs of the pupils in Blaenau Gwent. However, the proposal around a Faith School based provision in Phase 2 needs further development and consultation not just with the immediate school communities but importantly with the two dioceses - who are the trustees of the schools, and the Governing Bodies - who are the admissions authority.

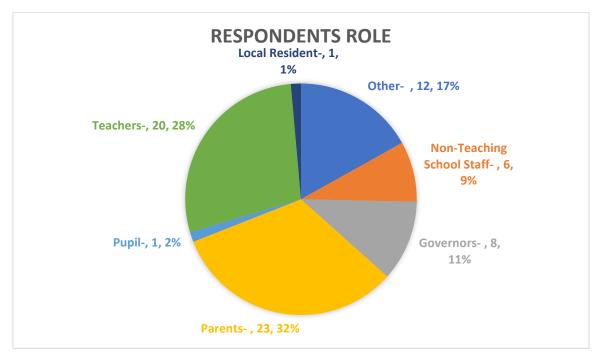
39.I feel that there is a further need for placement of those children with ASD who do not meet the requirements for Pen y Cwm but are not able either to access the curriculum at KS3 and KS4. You need a provision for these children. I appreciate that Pen y Cwm is full but there are children in KS1 and KS2 who are unable to access the mainstream environment. Could there be extra funding for schools to have another ASD base for these children within their current schools?

40.Nantyglo & Blaina Town Council supports the proposal in principle, it is thought that the proposals outlined in Phase 2 should include such provisions for such a centre within the Nantyglo and Blaina area (as in Phase 1).

Comments of those respondents who do not support the proposal.

41.We do want extra provision, but the provision proposed in the consultation does not go far enough and still leaves a lot of children falling through the gaps left by a lack of investment in the future of ASD/ALN education needs

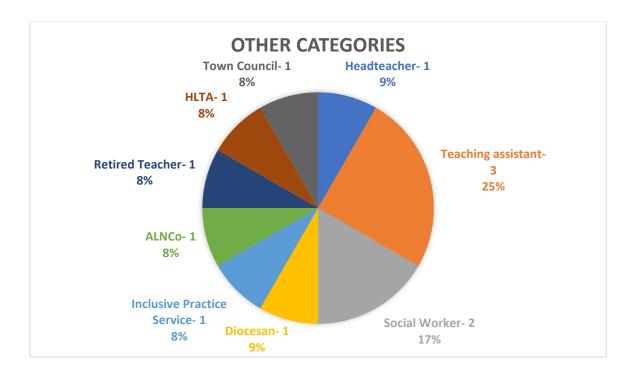
42.I do not agree with this proposal, I think it has been developed very quickly without enough discussion with those experienced in meeting the needs of pupils with ALN. I believe we can improve provision for learners by providing more money to schools to help them cater for pupils needs within their local school rather than sending them away to another setting. This particularly applies to primary aged school children who should be learning in their local school and have their needs met there. I believe that by increasing the number of places they will soon be filled, and this does not promote inclusion.



4 The below data chart shows each respondents category such as pupil/parent etc within the community.

The above data shows that there were over 34 that were or are part of the teaching profession, with 23 parents also commenting.

5. There were 12 respondents that recorded 'other' in relation to the above chart, a full breakdown of representation is captured below.



ALN Resource Base Consultation - Thematic Analysis

The primary themes arising from the analysis of responses including: social media and face to face engagement; written, email and survey correspondence are detailed below. The frequency of reference to each theme (from the most to the least prevalent) is also noted:

Theme	Frequency
This proposal will meet demand, increase capacity for ALN and cater for children's needs in both primary and secondary provision with an implementation timeline. This also allows children to stay in mainstream schools. The offer of Welsh and English provision is encouraging. There is a diverse range of schools considered across the county borough including Faith Based provision	33
The capacity in existing provision is full and there is a lack of specialist provision in mainstream settings, these can fail children especially when full class sizes are being affected by children who desperately need the ALN provision, as there is not enough provision.	12
Accessing learning environment for ALN learners in the correct way with highly skilled staff and training opportunities is the right approach	7
There is a need to consider early years settings for ALN in mainstream settings, as a result of covid and increased diagnosis of children.	6
Adequate funding is required to support the delivery for ALN as there has previously been a lack of investment.	5
It is good to see there is recognition that all efforts are made to ensure transition for pupils from primary into secondary provision for ALN learners in mainstream bases.	5
No adverse effect on current provision, reviewing current provision as well will support ALN needs i.e. possible increase in numbers at current provision.	4
On occasion referral panels haven't been successful in placing pupils as they cannot offer places and some schools are at breaking point. The council is out of touch and more needs to be done to support learners.	4
This proposal will increase capacity, however the places are needed now and not over a 6 year period.	3
There needs to be more clarification around ASD/ALN and how both can be met in the settings identified.	3
I believe there needs to be more links with the school improvement partners to support learning outcomes	3
It is good to see that Welsh-medium provision is included in the proposal however, there is a need for the provision before September 2024 as	2

identified within the consultation document. There is also a need by WG to lead on this otherwise we will have a generation being left aside.	
The proposal has been developed too quickly and without discussion of experts in this field.	2
Good to see that transport costs to provisions is noted in consultation document however it is also prudent to note that there is risk that due to Covid there may not be as many bus companies/taxis available to accommodate the need for transport.	2
There should be more discussion around phase 2 with the diocesan of schools along with governing bodies and schools.	1
What will happen to the appointment of staff if this proposal does not go forward?	1
From a parent's perspective it will be good to keep siblings together in a mainstream school if one has to attend a RB, better for parents.	1
It will open spaces in Pen y Cwm for additional pupils which is much needed.	1
Perhaps there should be consideration of trialling a bilingual base.	1
Noted the absence of promotion by the council/education the celebration of Autism Day in Blaenau Gwent.	1



Blaenau Gwent County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions to promote equality and improve outcomes for groups with protected characteristics. PLEASE NOTE: that you no longer need to complete a screening template. All decisions, policy reviews or policy implementation will now require a completed Integrated Impact Assessment.

- Section 1-Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2-Socio-economic Duty Sections 1 to 3 of the Equality Act 2010
- Section 3-Corporate Plan
- Section 4-Wellbeing of Future Generations (Wales) Act 2015
- Section 5-Welsh Language (Wales) Measure 2011
- Section 6-Children's Right "The Right Way"
- Section 7-Community Safety
- Section 8 Armed Forces
- Section 9-Data
- Section 10-Consultations Statutory Consultation Doctrine of Legitimate Expectation and Gunning Principles
- Section 11-Monitoring
- Section 12-Decision of proposal



Lead Officer	Head of Service	Service Area & Department	Date
Joanne Watts	Lynn Phillips	Education, Education Transformation and Business Change	18.4.23

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this. What is the proposal that needs to be assessed?

There are no associated policy developments and proposal, however, the Council is consulting upon a proposal to increase Capacity of ALN provision in the County Borough for Autistic Spectrum Disorder ASD and ALN Resource Bases across the County Borough



Section 1

Outline how the proposal will impact on any people or groups of people with protected charateristics, please refer to the Equalities Act 2010 (Wales) for further information Equality Act 2010: guidance - GOV.UK (www.gov.uk) and the EHRC guidance <u>The Essential Guide to the Public</u> Sector Equality Duty: EHRC

Briefly outline below if there will be any positive or negative impacts as a result of the proposal being considered.

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Age (people of all ages)	Yes	No	Any pupil from age 3 – 16 will have access to additonal spaces in a Autisum Spetrum Disorder (ASD)/ Additional Learning Needs (ALN) Resource Base in mainstream education
Disability (people with disabilities/ long term conditions)	Yes	No	The implementation of additional resource bases will ensure improved access to a high-quality, fully accessible teaching and learning environment, in line with 21st Century School standards, whilst also being DDA compliant. The additional facilities will ensure the health and safety of, along with improved wellbeing for a greater number of pupils in need of specialist provision.
Gender Reassignment (anybody who's gender identity or gender expression is different to the sex they were assigned at birth)	No	No	



			County Borough Council
Marriage or Civil Partnership (people who are married or in a civil partnership)	No	No	
Pregnancy and Maternity (women who are pregnant and/or on maternity leave)	No	No	
Race (people from black, Asian and minority ethnic communities and different racial backgrounds)	No	No	
Religion or Belief (people with different religions and beliefs including people with no beliefs)	Yes	No	This proposal is considering a ALN/ASD RB in a Faith Based School as part of Phase 2
Sex (women and men, girls and boys and those who self-identify their gender)	No	No	
Sexual Orientation (lesbian, gay, bisexual, heterosexual, other)	No	No	



<u>NOTE:</u> Section 2 only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the <u>Preparing for the Commencement of the Socio-economic Duty</u> Welsh Government Guidance.

Section 2 Socio-economic Duty (Strategic De The Welsh Governments Socio-econ Please consider the below vulnerat > Single parents and vulnerable fa > People with low literacy/numer > Pensioners > Looked after children > Homeless people	nomic Duty pr ble groups an amilies	nd consider how the pro	oposal could Imunity holds	affect them: > People who have e > People of all ages l > People living in the (WIMD)	s at the forefront of decision making. experienced the asylum system leaving a care setting e most deprived areas in Wales the criminal justice system
Socio Economic disadvantage definitions.	-	posal have a positive, neutral impacts on the	How could	you mitigate the apacts outlined?	Please highlight any evidence that has been considered.
Low Income / Income Poverty (cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)	Neutral				
Low and/or No Wealth (enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)	Neutral				



		Councy Borough Council
Material Deprivation (unable to	Neutral	
access basic goods and services		
i.e. financial products like life		
insurance, repair/replace broken		
electrical goods, warm home,		
hobbies etc.)		
Area Deprivation (where you live		
(rural areas), where you work	Neutral	
(accessibility of public transport)		
Impact on the environment?		
	Neutral	
Socio-economic Background		
(social class i.e. parents		
education, employment and		
income)		
Socio-economic Disadvantage		
(What cumulative impact will the	Neutral	
proposal have on people or		
groups because of their protected		
characteristic(s) or vulnerability or		
because they are already		
disadvantaged)		
5.		



Section 3-Corporate Plan Please outline any Corporate Plan linkages of the proposal - <u>BG Corporate Plan 22-27</u>				
Priority 1 - Maximise learning and skills for all to create a prosperous, thriving, resilient Blaenau Gwent	The Education Directorate is committed to providing high quality services to its citizens and uses various engagement methodologies in order to understand if the service is making the intended outcomes or if amendments to service delivery need to be considered			
Priority 2 - Respond to the nature and climate crisis and enable connected communities	By placing provisions in much needed areas, it is recognised that it can support and connect communities in school for ALN pupils i.e. much needed revolving door and pupils being part of their school community.			
Priority 3 - An ambitious and innovative council delivering quality services at the right time and in the right place	Effective engagement is crucial to ensure the Council runs effectively, the services delivered are appropriate and meet the needs of those that use them			
Priority 4 - Empowering and supporting communities to be safe, independent and resilient	Blaenau Gwent Council, together with its fellow local authorities across Gwent, have worked with schools, not only to challenge racism and hate crime, but to also promote inclusion and celebrate the region's diversity			



Loundy Borough Council
s) Act 2015 – The Five Ways of Working (ICLIP) requires the Council to consider how any proposal improves the economic, social, environmental
s of working as a baseline) tainable Development Principles in forming the proposal?
act of the proposal on the ability of communities to secure their well-being.
eating a long term local solution for Pupils with ALN within the County Borough,
s preventing problems from ocurring or getting worse oviding the right services for the right pupils in the right location preventing escalation of specia ping pupils in mainstream settings with the support they need.
will impact on other services provided in our communities (these might be Council services or organisations or groups) The present with ALN needs are integrated into mainstream setting enabling them to thrive along
ł



Collaboration	Consider how you are working with Council services or services delivered by other organisations or groups in our communities. Education Transformation team and Inclusion Service have worked collaboratively to ensure pupils have the provision they need to thrive.
Involvement	Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities. All interested parties will be consultees in this process if approved.

How does your proposal link to the Welsh Goverments Priorities for Wales? Please indicate below.

1. A PROSPEROUS WALES ... an innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.

Having localised resource bases for pupils who need this intervention will reduce travel and transport costs and contribute to a low carbon society.

2. A RESILIENT WALES ... a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change). Think about how your activity will have regard to protecting and enhancing biodiversity.



See above

3. A HEALTHIER WALES ... a society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

This supports pupils mental well-being by not having to travel potentially out side of the County Borough for their Education.

4. A MORE EQUAL WALES ... A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

There will be more options for parents to consider based on their child's schooling. English medium, Faith Based and Welsh-medium.

5. A WALES OF COHESIVE COMMUNITIES ... attractive, viable, safe and well-connected communities.

Enables pupils to feel connected to their communities weather this is mainstream school or local area rather than being education out of county.

6. A WALES OF VIBRANT CULTURE AND THRIVING ... a society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

This proposal will enable Welsh-medium pupils to access ALN provision via the medium of Welsh in a Welsh-medium school and continue to be involved in the mainstream activities such as the Urdd and sports via the medium of Welsh.

7. A GLOBALLY RESPONSIBLE WALES ... a nation which, when doing anything to improve the economic, social, environmental and cultural wellbeing of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Promoting the opportunities for 1m speakers by 2050.



Section 5-Welsh Language (Wales) Measure 2011 and Welsh Language Standards (The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact that any proposal may have on opportunities to use the Welsh language. <u>Welsh Language Standards</u>				
Requirement	Does the proposal have any positive, negative or neutral impacts in regards to the below?	What can be done to mitigate any	Please demonstrate any evidence used to form this opinion.	
Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i>	Yes	No	Under Blaenau Gwents Welsh in Education Strategic 10-Year Plan Outcome 6 Additional Learning Needs within the first 5 years of the plan.	
What opportunities are there to promote the Welsh Language? e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community	Yes	No	Parents will have the opportunity to keep their child who would need ALN provision in Welsh medium education if the proposal proceeds	
What opportunities are there for a person or person to use the Welsh Language? <i>e.g. staff, residents and visitors</i>	Yes		One of the proposed bases will be located in Ysgol Gymraeg Bro Helyg.	
Has the Welsh Language been considered in order to treat the Welsh language no less favourably than the English language?	No	No	Should the Proposal be approved provision will be implemented in both English/Welsh Primary and Secondary locations.	



Section 6 – Children's Rights Approach - The Right Way

The Children's Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children's rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children's Rights Approach?	Will the proposal have any negative impacts on the Children's Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Participation (child or young person as someone who actively contributes to society as a citizen)	Yes	Νο	Having a localised provision for pupils will enable them to stay in the Blaenau Gwent Borough for their education supporting the Citizenship approach.
Provision (the basic rights of children and young people to survive and develop)	Yes	No	Should this proposal be approved, ALN pupils needs will be met and help them develop.
Protection (children and young people are protected against exploitation, abuse or discrimination	No	No	



Section 7– Community Safety

Duty to Consider Crime and Disorder Implications

Section 17 of the Crime and Disorder Act 1998 places a duty on the local authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder, anti-social and other behaviour adversely affecting the local environment, the misuse of drugs, alcohol and other substances, re-offending and serious violence.

Impacts	Will the proposal have any positive impacts on crime and disorder?	Will the proposal have any negative impacts on crime and disorder?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
Crime (consider impact on each: victims, offenders and neighbourhoods)	No	No	
Anti-Social Behaviour and behaviour adversely affecting the local environment (consider impact on each: victims, offenders, neighbourhoods and green spaces)	No	No	
Misuse of drugs, alcohol and other substances	No	No	



(Think vulnerable children, adults, families and communities)			
Re-offending	No	No	
(Think young people and			
adults, victims, families,			
communities) Serious Violence	No	No	
(Think vulnerable young	INO	INO	
people, vulnerable adults,			
victims, families,			
communities)			
Counter Terrorism	No	No	
(People and places that			
are vulnerable to terrorism or violent extremism)			
of violent extremisin)			
Community Cohesion	No	No	
(Asylum seekers, Migrants,			
Victims or Hate Crime,			
Community tensions)			



Section 8- Armed Forces C	ection 8- Armed Forces Covenant Duty AFC Draft Statutory Guidance - Final.pdf				
Impacts	Will the proposal have any positive impacts on the armed forces community?	Will the proposal have any negative impacts on the armed forces community?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.		
 Health Provision of services Planning and funding Co-operation between bodies and professionals These healthcare functions are within scope of the Duty in the following settings: NHS Primary Care services, including general practice, community pharmacies, NHS dental, NHS optometry services and public health screening services. NHS Secondary Care services, including urgent and emergency care, 	No	No			



			Councy Borough Council
services, specialist care,			
mental health services, and			
additional needs services			
(as applicable).			
 Local authority-delivered 			
healthcare services,			
including sexual health			
services and drug and			
alcohol misuse services			
Education	No	No	
Admissions			
 Educational attainment 			
and curriculum			
 Child wellbeing 			
Transport			
Attendance			
 Additional needs support 			
 Use of Service Pupil 			
Premium funding (England			
only)			
These education functions			
are within scope of the			
Duty in compulsory			
education settings, that is,			
primary, secondary, and,			
for England only,			
compulsory further			
education. The Duty does			
not cover nursery (early			
years education), higher			
education, or other			



voluntary adult education settings			
 Housing Allocations policy for social housing Tenancy strategies (England only) Homelessness Disabled Facilities Grants 	No	No	

)	Section 9-Data-Please outline any data or evidence that has been used to develop the proposal, this can be previous consultations, local/national data, pilot projects, reports, feedback from clients etc.			
•	Data/evidence –What data/evidence was used? - provide any links.	What were the key findings?	How has the data/evidence informed this proposal?	
	Previous 5 year of numbers on roll for Resource Bases Projections for demand over the next 5 years for Resource Bases	The capacity for Resource Bases across the County Borough are 98% full with only 1 or 2 places in primary and secondary available	The data provided has enabled the level of demand to be realised for the next 7 years.	
		The cost for sending pupils out of county for their education is high and should this proposal proceed, there will be opportunities for pupils to be educated in provision in county with a cost reduction.	Cost Savings can be made to the Council by providing this proposal, however, the most important factor is that pupils of Blaenau- Gwent where possible will be education in Blaenau Gwent (a Local Solution) for sustainability of the school estate.	



	_
Are there any data or information gaps and if so what are they and how do you intend to address them?	

None

92

Section 10-Consultation. Please provide details of consultation undertaken to support the proposal. Please consider the Gunning Principles: -Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind. Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and Page opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

Briefly describe any planned consultations or consultations that have been carried out to date. Please consider the above principles.

Please consider the following questions; -

1.Who did you consult?

Formal consultation will be undertaken with all relevant stakeholders in order to gather their views. The consultee list complies with the Welsh Governments School Organisation Code, November 2022 Version 2

2. When did the consultation take place and was adequate time given for a response?

- The consultation is due to commence if approved by Cabinet Monday 24th April to Tuesday 6th June (this is in compliance with the above School Organisation Code and its (formal 42 consultation period)
- Once concluded an Outturn report will be developed and submitted to Cabinet for approval to proceed to the Statutory Notice Period which will also be in compliance with the School Organisation Code (28 days plus the day it was published)
- Once the Statutory Notice Period has concluded a formal Objections report will be produced and submitted to the Cabinet



		County Borough Council			
	 If the proposal to implement is approved by Cabinet a Decision Notification response will be produced and sent around to inform consultees of decision to implement. 				
	3.Was there enough information provided to response effectively?				
	A full consultation document was created in line with the Education Team also have/are in the process of arranging the process of arranging the process of arranges.	ne School Organisation Code above, stipulation what information needs to be included, the ng Drop in sessions in the 4 areas of Blaenau Gwent. Abertillery/Brynmawr/Ebbw Vale/Tredegar as are planned to capture the views of the Children & Young People.			
	n/a				
	5. Have the findings been considered in regards to the	decision?			
	n/a				
	Section 11-Monitoring and Review				
D w					
age 93	How will the implementation of the proposal be monitored, including the impacts or changes made?	The Inclusion Team will support the schools identified in this proposal to develop their ALN Resource Bases on a phased implementation. The Education Transformation team will support with the transformation change areas of the school(s) to accommodate this proposal. Annual reports to DMT, CLT Scrutiny and Cabinet			
		Inclusion team have monitoring tools developed to support pupils and an ALN panel is established to place pupils in the right environment for their needs. Such as Resource Bases/Specialist schools.			
	What monitoring tools will be used?	Data analysis and budget availability/challenges will dictate future policy development.			
		Education Transformation Team use Prince 2 Methodology to support any project implemented.			
	How will the results be used for future development?	Annual reports, Planning of School Places in Mainstream education are reviewed annually by the Education Transformation Team Facilities Officer, this in conjunction with the Inclusion team ALN Panel will ensure that the right provision for the right pupil is in place across the County Borough			



	An ALN review takes place annually by the Inclusion Team and pupils that require additional support will be discussed at ALN Panel.
Who is responsible for ensuring this happens?	Service Manager for Inclusion

Section 12 - Decision

Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.

Pag	Continue with the proposal in its current form	Yes 🗆 x	No
e 94	Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes 日	<u>No-</u>

Name of person con	Name of person completing the IIA		
Name: Sharon Rowlands			
Job Title:	b Title: Education Transformation Team Sustainable Communities for Learning Officer		
Date:	13.4.23		



Head of Service App	Head of Service Approval Name: Joanne Watts		
Name:			
Job Title: Service Manager for Education Transformation and Business Change			
Signature:	I Walks	Date:	18.4.23

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via <u>lissa.friel@blaenau-gwent.gov.uk</u> or <u>emma.scherptong@blaenau-gwent.gov.uk</u>.

This page is intentionally left blank