

## Name of Consultation: ALN Review Consultation

### Redacted Log of Correspondence



	Query/comment	Actioned
1	<p><b>Estyn's response to the proposal to improve provision and build capacity for pupils with additional learning needs (ALN) across Blaenau Gwent county borough.</b></p> <p><b>Introduction</b></p> <p>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.</p> <p>Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.</p> <p><b>Summary/Conclusion</b></p> <p>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.</p> <p>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.</p> <p><b>Description and benefits</b></p> <p>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.</p>	Recorded

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:

- 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 it 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	<p>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.</p> <p>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.</p>	Recorded
3		
4		
5		
6		
7		
8		
9		

#### Correspondence received after the consultation period finished

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