

# STRATEGIC POSITION PAPER

## An Options Appraisal of the Region's Sensory Impairment Services



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## 1. The Remit of this Strategic Position Paper

In January 2020, I met with Chief Officers from the region's five central Wales Local Authorities (CSC) to discuss the requirements to facilitate the publication of a strategic position paper, regarding their respective provisions for children and young people with sensory impairments.

It was agreed that I would undertake an evaluation of their sensory impairment services, based on the following brief;

*“Prepare an options appraisal paper for us to consider the best strategic direction for sensory provision across the 5 Central South Wales authorities.*

*We would like you to outline the context, specifically legislative and an analysis of the effectiveness and sustainability of the current models employed in the individual LAs.*

*Against each option could you identify the strengths and potential risk but also we would ask that you identify the option/s that you consider to be the most appropriate for us to investigate further”.*

This analysis is set in the context of the Welsh Government's aspirations to enhance and extend, regional working across the country.

*National policy “We all recognise that the future requires us to work differently, but more importantly it requires us to work together, within the sector and with our partners to deliver high quality, responsive and integrated public services alongside those who need them.”*

*Mark Drakeford, Welsh Government*

Accordingly, I was happy to undertake, on behalf of the five Central Local Authorities<sup>1</sup> of Wales a concise evaluation of the merits and feasibility of a *merged* regional service for sensory impairments, across the partner authorities;

Table 1

<b>Local Authority</b>	<b>Population<sup>2</sup></b>
Bridgend	139,200
Cardiff	478,000
Merthyr Tydfil	59 495
Rhondda Cynon Taff	240,131
Vale of Glamorgan	132,165
<b>Total for the Regional</b>	<b>1,048,991</b>

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<sup>1</sup> Local Authorities = LA

<sup>2</sup> Approximate figures via the respective LA websites (September 2020).

## 2. Purpose of this Position Paper

In order to gauge the efficacy of this options appraisal, the five Local Authorities need to have a clear understanding of the current and future ALN of this group of children and young people (C&YP) i.e. those with a sensory impairment.

Principal Strategic Question -

What does a needs analysis tell us about our current level of ALN (SI) and how is this forecast to change in future years?

*(\*Further, detailed, information is available in Section 4 of this paper - see Table 5. Central South Consortium Provision Map)*

Headline Analysis of the Trend Data

- Trend data for C&YP with sensory impairments including those with complex and additional needs indicate increases and decreases over the last 9 years.
- The 2019 CRIDE reported a 5% reduction in pupil numbers on the previous year, following an 11% *increase* in 2017.
- Generally, increases in the SI population in Wales, over the last 10 years, are in line with other national and international data e.g. EPICURE, Consortium for Research in Deaf Education<sup>3</sup> VIEW.
- By comparison; in England, there was a 7% increase in the equivalent low incidence population, 2019.

How well do the current SI services meet the needs C&YP now and what outcomes are being achieved?

Parallel Strategic Issues -

- I. In broad terms what activities do the services currently deliver to families, early settings and schools?
- II. Do we understand the operational impact i.e. outcomes of these SI services on C&YP with sensory impairments?
- III. How do the SI services offered, provided and align with the future strategic direction of ALN legislation in Wales?

Appendix I<sup>4</sup> sets out a universal description of a support and intervention framework offered by sensory impairment services. This section endeavours to provide an abridged reference which attempts to address questions I and II, of the above strategic issues detailed, above.

Question III will be addressed, in part, after this position paper.

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<sup>3</sup> <https://www.batod.org.uk/information/cride-reports/>

<sup>4</sup> See the Section Appendixes at the end of this document.

Supplementary strategic influences are set out in Appendix II - Prevailing Strategic Imperatives (*detailed key drivers in appraising the value of consulting further on a regional SI service*).

The *current* legislative requirements for SI workforces in England & Wales are further detailed in Appendix III - Sensory Impairment Workforces – Current Legislative Context, of this paper.

### 3. Sensory Impairment Services - Delivery Options

What options, if any, are persuasively viable for ensuring that the additional learning needs of C&YP with sensory impairments can continue to be met in the future? This question is set in a context of;

- projected changes in the numbers, type and prevalence of this particular ALN cohort;
- retaining a high-quality, specialist workforce, given trend data over the last 9 years?;
- impending ALN new legislation.

**The options comprise;**

- making no changes to existing operational SI services
- minimal changes that build on existing collaborations
- developing a regional SI service

All of these choices must ensure that the five partner LAs can continue to meet C&YP's ALN effectively in a context of diminishing resources. Together with, assimilating and incorporating local and national strategic/operational requirements?

### 4. Partner LA Inclusion Leads - Emerging Themes

#### Evidence Collecting Methodology

I gathered the individual views of the Inclusion Leads which has *critically* informed and shaped the options appraisal and resultant risk analysis.

**Table 2**

Date	Activity Descriptor
30 <sup>th</sup> January 2020	Meeting with LA Chief Officers group to discuss the fundamental ideas concerning an opportunity to undertake this appraisal, including confirmation (subsequently) of the rationale for this position paper
4 <sup>th</sup> March 2020	One-to-one meeting with David Davies (Vale of Glamorgan)
5 <sup>th</sup> March 2020	One-to-one meeting with Sarah Bowen (Merthyr Tydfil)
6 <sup>th</sup> March 2020	One-to-one meeting with Ceri Jones (RCT)
6 <sup>th</sup> March 2020	One-to-one meeting with Jennie Hughes (Cardiff)
6 <sup>th</sup> March 2020	One-to-one meeting with Michelle Hatcher (Bridgend)
<b>16<sup>th</sup> March 2020</b>	<b>Lockdown in the UK announced by Matt Hancock</b>
31 <sup>st</sup> July 2020	MS Teams video call Sarah Bowen (Merthyr Tydfil)
24 <sup>th</sup> August 2020	MS Teams video call Ceri Jones (RCT)
25 <sup>th</sup> August 2020	MS Teams video call Michelle Hatcher (Bridgend)
27 <sup>th</sup> August 2020	MS Teams video call Jennie Hughes (Cardiff)
28 <sup>th</sup> August 2020	MS Teams video call David Davies (Vale of Glamorgan)

The initial face-to-face meetings provided a platform, for the respective inclusion leads, (*in some cases the IL asked their respective Heads of SI to join the meeting*) to detail their views, frankly and candidly, concerning the idea of consulting on a regional SI Service.

In each meeting, I noted critical or significant comments from the discussions, which I have recorded, *confidentially* and *anonymously*.

A number of the ILs were definite about their interest in the concept of a regional SI Service. Others were robust in their beliefs that either minimal or no change was their preferred option.

Tables 1 & 2 below, summarises the views of the respective Inclusion leads and which informs the options appraisal and its consequent conclusions.

**Table 3**

<b>Retaining Status Quo</b>
1. It might create insecurity for families, schools and other stakeholders
2. Essential that the five LAs/region looks ahead, purposefully, as changes are impending
3. Capacity building in schools to support and promote inclusion
4. Stability for families and schools is critical, in the current climate, as families and schools face countless capacious changes
5. Prevailing management of local SI teams is robust and ensures high-quality delivery of Services
6. It might dilute the local offer
7. Conflicting and incompatible models of prevailing SI support across the respective LAs i.e. some delegate resources to schools, others retain similar resources, centrally
8. Existing 'local' collaborations were effective and meeting the ALN of C&YP
9. Established practices support effective regional cooperation and collaboration of SI teams, working across the five LAs
10. Transforming these collaborations, across all the five LAs into a unified SI Service, might present significant operational challenges to maintaining coherent support to families and schools
11. Two different Health Boards across the 5 LA
12. Potential loss of 'local' accountability with a regional SI Service
13. Large geographical area which would present logistical, organisational and travel obstacles
14. It had been discussed previously, with no follow-up or action, frustratingly
15. Needed 5 years ago – the opportunity was missed and solutions have been found
16. It could be destabilising for SI staff across the respective services
17. Exactly what would a regional service look like, how would it coordinate the various services efficiently and competently?
18. How would it operate strategically and operationally i.e. would there be lead LA, joint funding, to whom would a regional service be answerable?
19. Are there complimentary, operational models other than just a regional SI service?
20. It would impact and diminish IL's existing responsibilities (some ILs have responsibilities wider than SI services)
21. Professional impact for SI managers who might no longer have responsibility for directing and managing the SI service
22. In some LAs SI services are associated with other ALN services; a regional service would impact on these arrangements
23. Up-to-date statistics and information would be needed apropos the trends of this population, across the region, to inform a public consultation
24. Is it change for change sake?

**Table 4**

<b>Regional Service</b>	
1.	Essential that the five LAs/region looks ahead, purposefully, as changes are impending
2.	Reduce duplication of resources and limited time across the region
3.	Capacity building in schools to support and promote inclusion
4.	The Welsh government is committed to increasing and extending <i>regional</i> collaborations, local authority <i>integration</i> and advancing <i>regionalisation</i> ( <i>cited Local Government Reforms</i> )
5.	A regional SI service would prove to be more cost-effective for the five councils through economies of scale i.e. specialist's advice and SI population intelligence
6.	Facilitate the sharing of good practice from across all the LAs
7.	Build regional resources e.g. Braille support to students
8.	Addresses the forthcoming requirements to support in FE Colleges/post 16/post 19 given there is inadequate, dedicated resources and specialist staff for this sector
9.	Reduce the likelihood of ALN Tribunals where there's a paucity of provision or restricted access to specialist support staff
10.	Improve operational planning for probable changes in; the SI workforce, C&YP population, schools and concomitant legislative changes
11.	Ensure a sustainable and justifiable SI service going forward i.e. future-proofing SI provision for families and schools, across the region
12.	Improve the delivery of SI services; believe it would offer more efficient and effective support to families and schools, given the greater resources resultant from a regional SI Service
13.	Create a more resilient model of operational delivery given some of the trends they'd been experiencing in the last five years
14.	Opportunity to create a 'hub and spoke' type service model, balancing local operational delivery with a more strategic regional view of the needs of this SI C&YP populous

**Table 5\* Central South Consortium Provision Map**

The information<sup>5</sup> below represents the current data set for C&YP across the five partner LA SI services. It provides a summative insight into the range of SI provision offered and delivered by the respective LA SI Services.

It includes information about; the C&YP supported by the LAs; SI workforces, SI C&YP in Special Schools and individual *teaching resource centres (TRC)* as part of a continuum of ALN provision (*not all LAs operate separate and/or discrete SI TRCs*).

<b>The information below was collated from specific data provided by the respective Inclusion Leads.</b>	<b>Hearing Impaired</b>	<b>Visually Impaired</b>	<b>Multi-sensory Impaired</b>	<b>Totals</b>
Number of children & young people (C&YP) supported by the LA's SI service ( <i>maintained EY/LA school settings</i> )	833	372	13	1218
Number of SI C&YP supported in specialist LA resource bases	70	13	2	85

<sup>5</sup> Appendix IV contains the individual LA responses to my requested information

Number of SI C&YP supported in LA special school settings	78	101	19	198
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	x4 increase x1 decrease	x4 increase x1 decrease		
Number of <i>fte</i> SI teachers employed centrally	16	12.4	1.2	29.6
Number of <i>fte</i> SI support staff employed centrally	14.2	21.7	1	36.9
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	14	19.5	4	37.5
Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification related to HI/VI/MSI	13	21.5	2	36.5
Areas of SI provision provided, via an SLA, to another <i>local</i> LA	Two LAs hold SLAs with two other LAs from across the CSC consortium			
Number of specialist primary resource bases	4	0	0	4
Number of specialist secondary resource bases	4	0	0	4
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	2	0	0	2
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	16	0	0	15
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	5	4	0	9
Number of qualified staff ( <i>MQ</i> ) recruited in the last five years?	1	3	0	4
Number of unqualified staff ( <i>MQ</i> ) recruited in the last five years?	7	7	0	14

Additionally, I have included, in **Appendix V** (for information) a range of national data for Deaf C&YP in Wales and Visually Impaired C&YP in England<sup>6</sup>. This section evidences national trends over 9 years and details some significant interpretations.

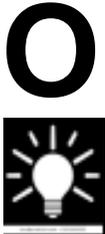
<sup>6</sup> I was unable to find/access specific data for C&YP with VI/MSI in Wales.

## 5. Options Appraisal and SWOT Analysis

- **Option 1:** Status quo i.e. no change but with some augmentation to the existing SLA arrangements, which builds on the pre-existing cross-border alliances.
- **Option 2:** In this scenario, CSC would look to create two, sub-regional sensory impairment services i.e. **SubR 1. RCT + Merthyr + Bridgend** **SubR 2. Vale** of Glamorgan + Cardiff.
- **Option 3:** Move forward with and consult on developing, publishing and ultimately consulting on a regional SI service model (experience indicates this process could take up to nine months from start to sign up).

**SWOT Analysis of Option A – Maintain Existing Service Arrangements (*remain as discrete SI Services, deployed and managed by existing LAs including furtherance of existing local collaborations*)**

<p><b>S</b></p>  <p><b>Strengths</b></p>	<p>No immediate disruption to families, schools and stakeholders;          No immediate change for existing SI staff;          No additional costs to the LA, short-term;          SI Service staff are accustomed to/and comfortable in how they work and perform i.e. it's how they've always done it;          No change to the current use and allocation of additional SI resources/equipment;          SI services fully staffed – maintains workforce constancy;          Relationships with and knowledge of schools is an asset;          Continuity for pupil's communication and learning needs;          Consistency of teaching interventions;          Provision of specialist equipment for pupils;          No change to SLAs to local LAs e.g. HI/VI and Habilitation works well;          No cost of a public consultation;          No need to review the role of SRC's for SI in relation to the SI teams (where applicable).</p>
<p><b>W</b></p>  <p><b>Weaknesses</b></p>	<p>No strategic resilience, if/when the SI and school populous changes i.e. rise in SI incidence;          Limited capacity to respond to likely changes in C&amp;YP's ALN;          Sustainability of local workforces remains exposed as they age/move, etc.          Increasing numbers of SI C&amp;YP with decreasing qualified workforce e.g. MQ staff is a risk for families - could lead to requests for out of authority placements;          Potential increased cost to fund requests for residential specialist school and/or FE college as pupil numbers rise – such placements could be catastrophic, financially;          At odds with Welsh Government's national drivers to foster and facilitate regional collaboration and ultimately regionalisation;          Leaves smaller LAs vulnerable to changes in service delivery i.e. how the respective SI service priorities are ordered and by whom?          Limited opportunities to review and share best practice across a regional team;          How are SI services held responsible, consistently across the region, in the future;          Parent and stakeholder views unsolicited;          No scrutiny of a successful regional SI Service in the SE of Wales;          Limited career development opportunities for SI workforce, within existing arrangements;          Retention, recognition and retainment of QTVI/VI &amp; MSI staff more challenging for LAs.</p>

 <p><b>Opportunities</b></p>	<p>Look to extend, enhance and formalise further local relationships;          Prepare for new ALN legislation via local partnerships based on current operational models;          Improve local monitoring protocols, already in place, to ensure trend data, SI C&amp;YP numbers, etc. are regularly scrutinized;          Crucial adjustments (operational and financial) can be made promptly to ensure the maintenance of high-quality SI;          Formalise sharing of regional SI practice, collect outputs and use information summatively, to inform and improve operational effectiveness across the region.</p>
 <p><b>Threats</b></p>	<p>No contingency in the event numbers of C&amp;YP and/or SI workforces becomes capacity critical;          Introduction of RSIS would mean loss of role/status for some members of the existing SI teams, this threat is assuaged;          If regionalisation becomes a mandated requirement for SI services in the future, changes will be forced on LAs rather than them being in control of such changes;          Staff within SI teams move to other local LA services for career development or further professional recognition i.e. they wish to be a part of a regional service, elsewhere;          Funding changes, at a local level, make unconnected SI service delivery increasingly more problematic for LAs.</p>

<p><b>SWOT Analysis of Option B – Nominal Improvements to Existing Service Arrangements (<i>Progress to sub-regional, SI Services, deployed and managed by a lead LA. Existing local collaboration formalised, managed and funded by a lead authority as a unified 'local' SI service:</i></b></p> <p><b>1 ~ Cardiff and Vale of Glamorgan become a unified sub-regional service</b>  <b>2 ~ Bridgend, Merthyr And RCT become a sub-regional service, coterminous with their respective Health Boards)</b></p>	
 <p><b>Strengths</b></p>	<p>As in Option B but furthermore incorporates -          Little or no disruption to families, schools and stakeholders;          Little of no change for existing SI staff;          No additional costs to the LA, short term;          SLAs and attendant costs/work upgraded;          Insignificant cost to affirm existing and/or any new agreements;          Operational staff experience minimal change;          Little or no change to the current use and allocation of additional SI resources/equipment.</p>

<p><b>W</b></p>  <p><b>Weaknesses</b></p>	<p>As in Option B but furthermore incorporates -  Minimum strategic resilience, if/when the SI and school populous changes;  This is a half-way house between existing arrangements and a full regional SI Service (<i>why make limited change</i>);  Reduced capacity to respond to likely changes in C&amp;YP's ALN locally;  Sustainability of local workforces remains perilous as staff age/ change/move on/illness, etc.;  At odds with Welsh Government's national drivers to foster and facilitate regionalisation but <i>more</i> in keeping with the spirit.</p>
<p><b>O</b></p>  <p><b>Opportunities</b></p>	<p>As in Option B but furthermore incorporates -  Curtailed opportunities to review and share best practice;  Smaller LAs less vulnerable to changes in service delivery demands i.e. SI service priorities, increasing C&amp;YP numbers;  The requirement to design a rudimentary strategic plan for unanticipated changes in C&amp;YP needs and/or impending workforce discrepancies;  Opportunity to review how SI services are evaluated and performance held accountable?  Joint planning for future legislative changes;  Modest ability to respond promptly and dynamically to changes in the SI population;  Minimal future-proofing the recruitment of specialist workforce;  Nominal progress of current systems apropos how existing SI services are appraised;  Ensure sub-regional SI Services' performance are transparent, always formative and through positive challenge and support, operational delivery held communally accountable?  Plan and respond, in a timely fashion, to future legislative changes;  Opportunity to co-produce new joint arrangements from the outset.</p>
<p><b>T</b></p>  <p><b>Threats</b></p>	<p>Existing Families will see any movement in this direction as an opportunity to reduce funding, albeit small;  All changes must be communicated promptly, transparently and with explicit detail;  Some members of current SI Staff teams may still feel threatened by any change;  Minimal improvement in the effective and efficient use of the respective LA's resources;  Repurpose overlapping funding and improve the quality and quantity of support to C&amp;YP, Families and Schools;  Inadequate to capacity to respond to significant growth following the introduction of the new ALN Legislation;  Workforce vagaries could impact on SLA arrangements in the event of compromised priorities.</p>

**SWOT Analysis of Option C – Move to a Consultation of the Efficacy and Utility of a Regional SI Service (*Develop, Publish and Consult on a Model of Operational Delivery for a Regional SI Service based on a Shared Strategic Vision*)**

**S**



**Strengths**

Regional SI Service (RSIS) ensures robust strategic resilience when the SI population and workforce experiences probable variations i.e. rise in SI incidence/ageing of MQ teachers;  
 Capacity to respond promptly, dynamically and therefore productively to changes in C&YP population/ALN;  
 RSIS workforce is durable, provides high levels of quality assurance and will be responsive and flexible to meet changing demography of SI C&YP;  
 Supports the Welsh Government’s national drivers to promote and facilitate regional collaboration and ultimately regionalisation;  
 Removes overlapping/duplication of funding thus improving the quality and quantity of support to C&YP, families and schools;  
**None** of the LAs is exposed or vulnerable to changing SI service priorities (planned or inadvertent);  
 Exceptional opportunities to review and share best practice across RSIS;  
 Develop a Regional Partnership Board (RPB) to include parents, C&YP and stakeholders, to challenge and support the RSIS’s outputs and outcomes (co-produce this Board?);  
 Indisputable transparency and accuracy vis-à-vis accountability of RSIS across the region;  
 Parent and stakeholder views inform RSIS development, expansion and communication;  
 Enhanced career development opportunities for RSIS workforce;  
 Considerably improved retention, recognition and retainment of QTVI/HI & MSI and other SI staff;  
 More efficient and effective use of the public purse;  
 Enriched value for money function with a RSIS;  
 Financial efficiencies can be reinvested into the RSIS facilitating ‘targeted’ workforce development/CPD/career opportunities;  
 An amalgamation of SI resources will ensure proportionate allocation of assets/equipment based on C&YP ALN;  
 New co-produced relationships with families, schools and stakeholders, providing new opportunities to re-evaluate and update existing primacies;  
 Consistency of pupil teaching/intervention programmes to C&YP;  
 Removes onerous SLAs between local LAs.

**W**

Likely short-term disruption to C&YP, their families, schools and stakeholders;  
 Individual LAs will share the control and management of the RSIS;  
 The inescapable political fallout from the change (will need managing);  
 Requires an innovative culture of sharing and distribution of resources across the five LAs;  
 Potential adverse publicity for the five LAs;  
 Extensive change for some existing SI staff, which may result in staff self-selecting and moving on;

 <p><b>Weaknesses</b></p>	<p>Reduction in the number of SI managers/leads;  This model is likely to be unwelcomed across some of the LA SI teams;  Some SI Service staff familiar with existing practices and performance may be disconcerted and unhappy with the change (short-term?);  Potential disruption to continuity for C&amp;YP and families, if not managed strongly;  Will require infrastructure change i.e. HR/finance/IT systems for new regional service;  Cost of a public consultation;  Additional implementation costs for the LA, short term.</p>
 <p><b>Opportunities</b></p>	<p>Consolidate and rationalise regional resources and structures to improve the efficiency, effectiveness and deployment of an integrated service which could maximise further financial expenditure;  Develop integrated KPI systems focused on outcomes, agreed outputs, progress and achievements for C&amp;YP;  Revamp monitoring and prioritisation protocols to ensure that trend data, SI C&amp;YP numbers and more are regularly scrutinized;  Annual RSIS improvement plan will enable adjustments to be made to safeguard high-quality SI support to C&amp;YP and their families;  Formalise sharing of regional SI practice, through CPD, Improvement &amp; Training programmes, to increase operational effectiveness and quality, across the region.</p>
 <p><b>Threats</b></p>	<p>Plans communicated inadequately;  Existing families may see any move in this direction as an opportunity to reduce funding;  Schools may feel this is potentially a disrupting, precarious strategic and/or operational change for C&amp;YP;  Some members of current SI Staff teams will be threatened by impending change;  Without a robust and credible consensus for change, across the 5 SI teams, any consultation on a RSIS could be ruinous;  Perceived loss of control at local levels by managers/SI leaders;  Will each LA support this move, unequivocally? Without this assurance you will not achieve the effective regionalisation of SI Services;  Loss of status or job security across some SI teams;  Professional peer pressure, among some of the team members, who may feel compelled to resist change to protect co-workers. This is a powerful driver in the workplace i.e. it maintains service identity and stability, so any change to these facets is resisted;  Fear of failure/exposure under a different regime;  Significant loss of employee confidence in the implementation change process;  Cross authority politics i.e. the size, influence and control of the respective LAs cannot be agreed.</p>

## 6. Options - Risk Appraisal

The following tables attempts to assess the risks associated with some of the *key activities/decisions* for each option. This process is based on a probability rating, detailed in the table below.

As ever, risk appraisals are principally subjective views and are not intended to be unequivocal or based on any absolute empirical values.

Their purpose is to provide a professional judgement consequent to the key risks of each key activities/decisions appraised. They are *indicative* of a risk calculation which has been subject to an analysis, by me, of what could cause harm to specific aspects of the respective SI services operational activities and consequent decisions.

It seeks to *identify* the threats and harm that might result in collective risk, within the context of the respective option's descriptors.

What I have not included with these risk appraisals is the respective help each LA would require to mitigate high-risk activities/decisions i.e. putting control measures in place based on the level, severity and likelihood of a particular risk.

### Table 3 – Understanding Risk Assessment Ratings

A risk assessment rating is the *possibility* that an event will occur with detrimental outcomes for a particular *stakeholder group(s), activities or consequence of taking this decision*.

For example; *disruption to families (chosen from Option A)* has a risk assessment rating of 1 ~ indicated green in Table 6. This suggests the likelihood of this risk is improbable and the potential impact of the choice, on this activity, is negligible.

Please note I have only selected *critical* operational/strategic risks, for each option. These risk assessment ratings are based on my professional judgement of the critical operating risks, for each option.

Using coloured blocks to indicate the individual risk rating, an aggregated visual ranking can be garnered from each option, so providing an overall appreciation of risk for each option i.e. the more green blocks estimated for an option, the less risk associated with that choice and vice-versa.

**Table 6**

Likelihood	Severity Rating			
Certain - 5	20	15	10	5
Probable - 4	16	12	8	4
Occasional - 3	12	9	6	3
Remote - 2	8	6	4	2
Improbable -1	4	3	2	1
Probability Rating	Catastrophic - 4	Critical - 3	Marginal - 2	Negligible -1

**Table 4 - Option Risk Appraisal**

<b>Option A – Maintain Existing Service Arrangements (remain as discrete SI Services, deployed and managed by existing LAs including furtherance of existing local collaborations Key Risks ~ Appraisal</b>	
	<sup>7</sup> Rating
Disruption to families, schools and stakeholders;	
Immediate change for existing SI staff;	
Additional costs to LAs, short-term;	
Change to the current use and allocation of additional SI resources/equipment;	
SI services remain fully staffed – maintains workforce constancy;	
Continuity for pupil’s communication and learning needs;	
Continuity of provision of specialist equipment for pupils;	
No strategic/operational resilience, if/ when the SI and school populous changes i.e. rise in SI incidence;	
Impact of increasing numbers of SI C&YP together with the decreasing workforce (MQ staff) results in the risk of families requesting out of authority placements’ due to inadequate access to MQ staff;	
Increased cost to fund requests for residential specialist FE college placements, financially, without appropriately experienced SI staff;	
At odds with Welsh Government’s national drivers to foster and facilitate regional collaboration and regionalisation;	
Leaves smaller LAs vulnerable to changes in service delivery i.e. how SI service priorities are ordered and by whom;	
Retention, recognition and retainment of QTVI/HI & MSI staff more challenging for LAs.	
<b>Option B – Nominal Improvements to Existing Service Arrangements (Progress to sub-regional, SI Services, deployed and managed by a lead LA. Existing local collaboration formalised, managed and funded by a lead authority as a unified ‘local’ SI service:</b>	
<ul style="list-style-type: none"> <li>- <b>Cardiff and Vale of Glamorgan become a unified sub-regional service</b></li> <li>- <b>Bridgend, Merthyr And RCT become a sub-regional service, coterminous with their respective Health Boards</b></li> </ul>	
	Rating
Disruption to families, schools and stakeholders;	
Little change for existing staff;	
Additional costs to the LA, short term;	
Change to the current use and allocation of additional SI resources/ equipment;	

<sup>7</sup> Inevitably these judgements are subjective and based on the author’s knowledge and experience of similar service facing similar challenges and changes. These risk ratings are open to further debate and discussion.

Minimal strategic resilience when the SI and school populous changes;	
Capacity to respond to likely changes in C&YP's ALN locally, restricted;	
Sustainability of local workforces remains perilous as staff age/ change/move on/illness, etc.;	
At odds with Welsh Government's national drivers to foster and facilitate regionalisation but <i>more</i> in keeping with the spirit;	
Require a plan for future legislative changes with resultant operational impacts;	
Ability to respond promptly and dynamically to changes in the SI population;	
Future-proofing the recruitment of specialist workforce;	
Existing Families will see any movement in this direction as an opportunity to reduce funding, albeit small; Improvement in the effective and efficient use of the respective LA's resources;	
<b>Option C – Move to a Consultation of the Efficacy and Utility of a Regional SI Service (<i>Develop, Publish and Consult on a Model of Operational Delivery for a Regional SI Service based on a Shared Strategic Vision</i>)</b>	
	<b>Rating</b>
Changes to a regional SI Service (RSIS) ensure strategic resilience when the SI population and workforce experiences variations i.e. rise in SI incidence/ageing specialist teachers;	
A transition plan and implementation arrangements to a RSIS workforce not managed effectively i.e. does not provide well-judged levels of quality assurance together-with responsive operational tractability;	
Does not support the Welsh Government's national drivers to promote and facilitate regional collaboration and regionalisation;	
Removal of overlapping/duplication of funding facilitating sustained improvement in the quality and quantity of support to C&YP, families and schools;	
None of the LAs is exposed or vulnerable to changing SI service priorities (planned or inadvertent);	
Opportunities to review and share best practice across RSIS;	
Ineffectual Regional Partnership Board (RPB) to include parents, C&YP and stakeholders, to challenge and support the RSIS's outputs and outcomes;	
Parent and stakeholder views unsolicited regarding the concept, development, expansion and communication of a RSIS;	
Enhanced career development opportunities for RSIS workforce;	
Improve retention, recognition and retainment of QTVI/HI & MSI and other SI staff;	
Failure to move to a RSIS results in not maximising the efficient and effective use of the public purse;	
Failure to move to a RSIS will impact proportionately on the allocation of assets/equipment/resources based on C&YP ALN, directly;	

Disruption to C&YP, their families, schools and stakeholders;	Orange
Individual LAs perceive a loss of direct control and management of their SI services;	Red
Likelihood of political fallout from the change which will need managing;	Red
Potential adverse publicity for the five LAs;	Red
Impact of the reduction in the number of SI managers/leads and their respective responsibilities;	Red
Some SI Service staff familiar with existing practices and performance may be disconcerted and unhappy with the change (short-term?);	Red
Impact of infrastructure change i.e. HR/finance/IT systems for new regional service;	Orange
The additional cost of a public consultation;	Orange
Additional implementation costs for the LAs (medium-term);	Orange
Impact of consolidating and rationalising regional resources and structures to improve the efficiency and effectiveness of the integrated service and maximise financial expenditure;	Green
The time required to develop integrated KPI systems focused on outcomes, outputs, progress and achievements for C&YP;	Orange
Plans communicated inadequately and by the wrong tier of Officers;	Red
Existing families may perceive any move in this direction as an opportunity to reduce funding without the opportunity to ask questions;	Red
Schools/ALNCos may feel this is a disrupting strategic and/or operational move for C&YP at a time of excessive change;	Orange
Without a robust and credible consensus for change, across the 5 SI teams, any consultation on a RSIS could be ruinous;	Red
Risk of professional peer pressure among some of the SI team members i.e. feel compelled to resist change (to protect their co-workers?). Powerful driver in the workplace i.e. maintain identity professional to preserve stability i.e. change is resisted;	Orange
The risk associated with cross-authority politics i.e. the size, influence and control of the respective LAs.	Red

## 7. Conclusions and Recommendations

It is clear from my various discussions, with your inclusion leads, that the notion of consulting further on a model of unified regional delivery, for the existing LA SI Services, is not universally welcomed.

I've set out the explanations and my reasons for citing these reluctances, within this paper. Accordingly, I have appraised for the LA Chief Officers group, three options going forward;

- i.) **Option 1:** Status quo i.e. no change but with some augmentation to the existing SLA arrangements, which builds on the pre-existing cross-border alliances.

**Appraisal judgement – nonthreatening choice;** little change and probably welcomed by a number of the LAs. Overall risk rating would be low i.e. Green

- ii.) **Option 2:** In this scenario, CSC would look to create two, sub-regional sensory impairment services i.e. SubR 1. RCT + Merthyr + Bridgend SubR 2. Vale of Glamorgan + Cardiff.

This would offer a modest scale of improvement, above and beyond the existing SLAs/parochial partnerships, across what I indicate would be the two sub-regions.

There is some attainable benefit to be realised vis-à-vis the formation of two sub-regional SI services i.e. they would align to one of two, prevailing Health Boards.

Nonetheless, it would seem oddly inexplicable to take these small steps, towards realising some of the evident and tangible benefits of a full regional SI service, and not consider moving forward with a full consultation on a RSIS.

However, this might be considered, by the respective LAs, as a graduated and pragmatic approach toward the expansion to a full, regional SI service, in the future? Overall risk rating would be **low** i.e. Green

**Appraisal judgement – measured choice;** minor change and probably welcomed by a number of the LAs

- iii.) **Option 3:** Move forward with and consult on, developing, publishing and ultimately implement a regional SI service model. Experience indicates this process could take up to nine months from start to sign up.

I believe this option would strategically future proof these very important, individual and exclusive ALN services for C&YP and their families.

**Appraisal judgement – challenging;** major change not entirely welcomed by a number of the LAs, nevertheless the potential benefits and rewards for C&YP, families and stakeholders could be significant. It would provide a level of strategic and operational resilience unparalleled by the two other options detailed above.

Overall risk rating would be medium/**high** i.e. **amber/red**

*Conclusively*, there are significant and inherent high levels of risk associated with taking forward Option 3.

*Without* an explicit consensus of support from all of the local authorities; respective Politicians, Corporate Management Teams and key players who would be responsible for the delivery and implementation of a RSIS.

To progress this strategic option, without an unequivocal agreement/backing by the groups above would result in adverse publicity for Political Leaders/CEO/Chief Officers, from the respective LAs.

The collateral fallout from any public oppositional exposure would make the task of convincing families, schools and stakeholders of the merits of a regional SI service, **very difficult**.

In my opinion, the critical question to be answered is; 'how risk-averse the respective LAs are for change?'

I think the value of change or not, is summed up impeccably by Ex USA President Bill Clinton who said:

**"The price of doing the same old thing is far higher than the price of change."**

### **A Regional SI Service - South East Consortium**

Colleagues will be aware, the South East Consortium operates a regional SI service which has recently undergone a [Value for Money Review](#). This regional SI service supports approx. 1,900 families.

In regards the existing regional SI Service cited mentioned above; a further possibility might be to '*test stakeholder's appetite*' by setting up a half-day seminar; inviting parents, schools and local CVS organisations who are currently and positively working with and supporting the South East Consortium's regional SIS.

This would enable them to meet with representatives from CSC's parents, school representatives, key SI Staff and other stakeholders, to hear about their experiences of a regional SI service.

They would be able to ask questions, without contrary backstories and uncorroborated half-truths, enabling them to understand the benefits of a unified, integrated and dynamic SI service across five SEC LAs.



Mark Geraghty  
SEND Consultant

September 2020

## APPENDICES

### I. A Summary of the Support and Interventions Offered by Sensory Impairment Services

The following statements have been simplified and are intended to provide a broad outline of the SI services currently delivered across the five Welsh LAs. Its purpose is to summarise and illustrate an operational framework which will be referenced in subsequent sections of this paper.

Local Sensory Inclusion Services (SIS<sup>8</sup>) are specialist teams which support C&YP with sensory impairments; in early years, educational settings and across local communities in Wales.

They are staffed by trained Teachers of the Deaf (QToDs), Qualified Teachers of the Visually Impaired (QTVIs), Qualified Teachers of MSI and other specialist support staff. All of whom provide an all-in-one service from the point of diagnosis until the child or young person leaves full-time education (and occasionally beyond).

In broad terms SIS support; children, young people, families, colleagues in health, education and other multi-agency settings, to meet the specific educational/ALN of C&YP with sensory impairment.

SIS commonly receive recommendations from health agencies but also parents/carers, schools and other stakeholder agencies, but always concerning medical advice regarding hearing and/or visual loss.

**a) Hearing impairments** - There are two main types of deafness. The first happens when there is a fault in the inner ear – usually in the cochlea. This is called 'sensorineural deafness' and is permanent.

The level of hearing loss may be described as mild, moderate, severe or profound and may not be the same in each ear, with only a few children totally deaf.

Amplification of residual hearing may be made possible with a hearing aid. The more profound the hearing loss, the greater the likelihood that the child will be given a cochlear implant, which allows electrical signals to be sent directly to the auditory nerve, providing a sensation of hearing.

The second type of deafness happens when sounds fail to pass efficiently through the outer and middle ear to the cochlea and auditory nerve. This is most commonly caused by a build-up of fluid in the middle ear, often referred to as 'glue' ear.

This is known as 'conductive deafness' and is the most common type of hearing loss. A conductive loss is likely to fluctuate and be temporary. It is often treated by inserting grommets into the eardrum: ventilation tubes which allow fresh air to enter the middle ear to keep it free of fluid.

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<sup>8</sup> I have generalised all the various service titles into a single generic term – Sensory Inclusion Service.

## Assessment and Supporting Children & Young People with Hearing Loss

Most children with a significant sensorineural hearing loss will have been identified before they enter an early year setting. Other children, particularly those with a fluctuating conductive loss, may not. Early years practitioners have an important role to play in noticing and recording aspects of a child's development that might indicate a hearing loss.

The following signs are indicative children with a hearing loss:

- Delayed development of speech
- Watching your face and lips carefully when you're speaking.
- Often failing to respond when called by name.
- Pausing after an instruction has been given, then watching other children to see what to do.
- Speaking unusually loudly or quietly.

A significant hearing loss can have a major impact on other aspects of a child's development – particularly on communication and social interaction skills. The child may use sign language, speech or a combination of the two. Unless steps are taken to help the child feel confident in social situations, they are likely to be withdrawn – remaining on the edge of groups of children or preferring a one-to-one activity with an adult.

### How Do Sensory Services help and Support Practitioners?

Firstly, it is vital to work closely with the child's parents. They will have an enormous amount of information about the nature of their child's hearing loss and the best means of communication. Secondly, a child with a significant hearing loss is likely to be having regular input from a specialist teacher of the Deaf (QToD) or specialist support assistant.

It is important to make time to seek their advice and input, where required. Practitioners can help the young child with hearing impairment by:

- providing additional visual clues to support information you give verbally;
- making sure that the child can see your face and lips when you're speaking, and that you gain their attention before speaking;
- checking that the child has understood you, repeating or giving extra clues if necessary;
- considering learning sign language;
- monitoring noise levels – a hearing aid amplifies everything, not just your voice.

**b) Visual impairments** - The term 'visually impaired' is used to describe a child who has sight problems severe enough to interfere with their learning. The majority of children with a visual impairment still have some vision – only five per cent are totally blind.

Most blind or partially sighted children have their sight problem from birth, though a small number lose their sight later in life following illness or an accident.

### Assessment and Supporting Children & Young People with a Visual Impairment

Most children with a marked visual impairment will arrive in the nursery with their condition already diagnosed. Early years practitioners' observations can still contribute to the

ongoing assessment of the child's functional use of vision, linking with the Qualified Teacher of Visually Impaired Children (QTVI).

Practitioners can look out for signs of impaired vision in children by noticing the child who:

- displays undue sensitivity to light;
- closes or covers one eye when attempting visual tasks;
- often trips or bumps into things;
- holds books unusually close to their face;
- tilts their head to an unusual angle when trying to focus.

Since 80 per cent of communication is non-verbal, the young child with impaired vision is at a huge disadvantage when developing interpersonal skills. Unable to discern the facial expressions of others, they cannot 'read' reactions to things they say and find verbal turn-taking very difficult. These children cannot learn by watching, only by doing.

Restricted vision also leads to restricted mobility. In a typically developing child, vision is a huge motivator: seeing the desired toy just out of reach prompts the child to stretch for it or crawl towards it, but the visually impaired child doesn't know the toy exists.

The development of play – leading to concepts such as conservation, classification and one-to-one correspondence – is also negatively affected by visual impairment. When a child cannot observe others at play, it limits their skills.

Finally, independence and self-help skills are significantly delayed in a child with sight problems.

### **How Do Sensory Services help and Support Teaching Practitioners?**

Close links with parents and specialist professionals are vital. Additionally, practitioners can help the young child with a visual impairment by:

- making wall displays colourful, clear and uncluttered;
- offering toys with good colour contrast and books with simple illustrations;
- offering activities that draw upon all the senses;
- saying the child's name before giving instructions;
- giving individual demonstrations of tasks;
- warning of changes in routine;
- giving the child longer to explore new toys and activities;
- considering providing a secure, familiar place to play;
- if a toy rolls out of reach, leading the child towards it to encourage independent exploration;
- describing the things, you or others do, to the child;
- helping the child connect with others and to link present with past experiences;
- encouraging other children to approach the child;
- taking care not to overprotect the child, becoming a barrier between them and others.

### c) **Dual sensory loss** (*sometimes erroneously referred to as deafblindness*)

Additionally, when a C&YP has difficulty seeing and hearing, they can be referred to as having a dual sensory loss (incorrectly referred to as deafblind).

Usually, such C&YP will have difficulty with communication, mobilising and accessing information.

The majority of people in the UK with dual sensory loss are older adults, the incidence in C&YP is very low much lower than HI and VI C&YP. There are genetic causes such as Usher Syndrome and also dual sensory impairment can be caused by injury or infection.

Dual sensory loss can often be misdiagnosed especially when it is part of a complex, comorbid condition.

## II. **Prevailing Strategic Imperatives** (*key drivers in appraising the value of consulting further on a regional SI service, or not*):

I have not tried to respond to **all** of the bullet points, below, but publish these as an aide memoir for LA Officers when considering the merits of - change or no change? A robust Value for Money Review would, however, look to assess and evaluate each of these descriptors.

- ✎ Are the current service delivery models still fit for purpose and do they represent 'value for money?'
- ✎ What alternative delivery models could be considered which would ensure, as a minimum, that the five LAs continue to meet their statutory responsibilities?
- ✎ What are the benefits and risks to consulting further on a joint arrangement?
- ✎ How would you ensure that a regional SI service identifies ALN/SI children's needs, appropriately?
- ✎ Safeguard C&YP's ALN so they can continue to be met now, and in the foreseeable future?
- ✎ Specialist interventions can be carried out efficiently, effectively and by appropriately qualified staff?
- ✎ Would a regional SI service have the capacity to support, explicitly, C&YP's preparation for life, as an adult? (*this will include living independently, entering paid employment and/or accessing higher education thus participate as valued and valuable members in 'their communities'?*)
- ✎ How a local (and regional?) SI services would ensure it has sufficient resources, remains sustainable and continues to represent value for money?
- ✎ Can local (and regional?) SI services continue to build inclusive capacity in educational settings and prepare families to support their children as young adults and beyond, as the trends in the SI population vacillate?

- ✎ Could a regional service (or a version of it) work harmoniously and effectively, in each locality areas, responding to ALNs while according to the local context?
- ✎ What quality improvement lessons can be learnt from best practice, elsewhere?

### III. Sensory Impairment Workforces – Current Legislative Context

#### The Requirement Hold a Mandatory Qualification (MQ) in Hearing/Visual and/or Multi-sensory Impairment

I have searched, exhaustively, the legislative requirements for teachers to hold the Mandatory Qualification (MQ) to teach/support C&YP with a hearing, visual or multi-sensory impairment (HI/VI & MSI).

The Department for Education (England) which has legal oversight for ensuring all teachers hold a [MQ](#) and who are required to ensure training providers meet the required standards for delivering the training, specify:

*‘To teach a class of pupils with hearing impairment (HI), vision impairment (VI), or a multi-sensory impairment (MSI), a teacher **must** hold a mandatory qualification. This qualification is required in addition to qualified teacher status’.*

The requirement for peripatetic or advisory teachers to hold this qualification is not the same i.e. it’s not a mandatory prerequisite, as it is for those who teach a class of wholly or mainly HI/VI/MSI, C&YP.

Consequently, theoretically, Welsh LAs *could* employ HI/VI/MSI teachers to support discrete C&YP i.e. not taught in a class of wholly or mainly HI/VI and/or MSI C&YP, in inclusive mainstream or special school settings and who don’t hold an MQ.

However, to complete a statutory assessment of a child who has a hearing/visual and/or multi-sensory impairment, LA’s **must** ensure this part of the assessment is carried out by a teacher holding the relevant MQ.

Theoretically, LAs could ‘buy-in’ a teacher holding the appropriate MQ to undertake these assessments or employ one teacher from each MQ area, who specifically completed these legal appraisals for the LA.

Notwithstanding this, I have also sought advice from [NatSIP](#) on this specific matter. They confirm my interpretation of the law and affirm:

*... agree with your interpretation of the law, as it stands. As far as we understand the MQ does apply to Wales. Current legislation and Code of Practice (England) do say that the MQ is a ‘**must**’ for a class and is a ‘**should**’ for visiting teachers. Mandatory ‘no’, but recommended ‘yes’!*

*The MQ is required for statutory contributions to assessments, EHCPs, etc. (or the current equivalent in Wales, Statements) NatSIP 2020*

Almost all C&YP on ALN support are educated in mainstream schools (see **Table 1**) rather than specialist settings (or SRC). Schools in Wales have a high level of autonomy in how they support children with ALN, guided by the *current* ALN Code of Practice<sup>9</sup>.

Schools can choose to seek the support of particular professionals/specialist support and/or programmes or to provide their staff with training in related areas. The exception would be where a child's statement of ALN specifies the *type and level* of specialist teacher/Sl support intervention. In the case of C&YP with Sensory Impairments<sup>10</sup>, their *frequency* and *distribution* of incidence are extremely idiosyncratic i.e. exceptionally low and irregular in occurrence, by comparison with other areas of ALN.

#### IV. Individual Provision Maps for Each LA

This section itemises the SI Service provision, workforce and C&YP population for each of the partner LAs, in the Central Wales consortium. A summary of these individual provision maps can be found in **Section 4. Table 3** of the position paper.

##### Bridgend LA

<b>Provision Map Bridgend LA – Detailing Overall C&amp;YP Numbers and SI Staffing March 2020</b>				
Number of children & young people (C&YP) supported by the LA's SI service ( <i>maintained EY/LA school settings</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	266	78	7	0
Number of SI C&YP supported in specialist LA resource bases	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	7	0	0	0
Number of SI C&YP supported in LA special school settings	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	23	26	8	0
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	<input checked="" type="radio"/> increased	<input checked="" type="radio"/> increased	<input type="checkbox"/> increased	<input type="checkbox"/> increased
	<input type="checkbox"/> decreased	<input type="checkbox"/> decreased	<input type="checkbox"/> decreased	<input type="checkbox"/> decreased
Number of <i>fte</i> SI teachers employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3	1.8	0	0
Number of <i>fte</i> SI support staff employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	5	5	0	0
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification (MQ)	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	0

Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3	2	0	0
Areas of SI provision provided, via an SLA, to another <i>local</i> LA	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	0
Number of specialist primary resource bases <sup>11</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1 *	0	0	0
Number of specialist secondary resource bases <sup>12</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1 *	0	0	0
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification (MQ)	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	0
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify e.g. Physical Impaired Staff
	2	0	0	0
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	0
Number of qualified staff (MQ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	1	0	0
Number of unqualified staff (MQ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	0
<i>Please leave this section empty</i>				

## Cardiff LA

<sup>9</sup> I understand a new ALN Code of Practice will be published in early 2021

<sup>10</sup> A sensory impairment is when one of the senses – sight, hearing, smell, touch, taste or spatial awareness – is not working as it should. These children have problems with hearing, vision and/or both referred to as a dual sensory impairment.

<sup>11</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<sup>12</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<b>Provision Map Cardiff LA - Detailing Overall C&amp;YP Numbers and SI Staffing March 2020</b>				
Number of children & young people (C&YP) supported by the LA's SI service ( <i>maintained EY/LA school settings</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	220 (not incl HIRB or OLA) 12 home 14 nursery	124 14 home 7 nursery	3 0 home 1 nursery	
Number of SI C&YP supported in specialist LA resource bases	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	36 HI RB 4 other SRB	10 (NB there's no VI base in Cardiff- these are children in learning bases supported by VI service)	2	
Number of SI C&YP supported in LA special school settings	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	25	39	8	
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	<input type="checkbox"/> increased <input type="checkbox"/> decreased	<input type="checkbox"/> increased X <input type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased
Number of <i>fte</i> SI teachers employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	5.8	6.8	1	
Number of <i>fte</i> SI support staff employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	2	1	
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	5.8	8	1	Trainee sp teacher VI x2 trainee sp teacher MSI x1
Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification related	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	2	1	

to HI/VI/MSI				
Areas of SI provision provided, via an SLA, to another local LA	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	VOG	VOG	
Number of specialist primary resource bases <sup>13</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	
Number of specialist secondary resource bases <sup>14</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	6 HIRB (NB-staff employed by the schools)			
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify e.g. Physical Impaired Staff
	12 HIRB (NB-staff employed by the schools)			
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	4			
Number of qualified staff ( <i>MQ</i> ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	4 (incl HIRB)	0	0	
Number of unqualified staff ( <i>MQ</i> ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify

<sup>13</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<sup>14</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

	5 (incl HIRB)	3		1 VI teacher undertaking MSI training
<i>Please leave this section empty</i>				

### Merthyr Tydfil LA

Provision Map Merthyr Tydfil LA - Detailing Overall C&YP Numbers and SI Staffing March 2020				
Number of children & young people (C&YP) supported by the LA's SI service <i>(maintained EY/LA school settings)</i>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	42	0	0	
Number of SI C&YP supported in specialist LA resource bases	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	
Number of SI C&YP supported in LA special school settings	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	4	9	1	
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	<input type="checkbox"/> increased <input checked="" type="checkbox"/> decreased	<input type="checkbox"/> increased <input checked="" type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased
Number of <i>fte</i> SI teachers employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	
Number of <i>fte</i> SI support staff employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	4.5 <sup>15</sup>	0	
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	
Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	4.5		

related to HI/VI/MSI				
Areas of SI provision provided, via an SLA, to another <i>local</i> LA	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	N/A	Yes		
Number of specialist primary resource bases <sup>16</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	0
Number of specialist secondary resource bases <sup>17</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	0
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	0
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify e.g. Physical Impaired Staff
	0	0	0	0
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	0
Number of qualified staff ( <i>MQ</i> ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1 <sup>18</sup>	1 <sup>19</sup>	0	0

<sup>15</sup> 4.5 LSAs are supporting statemented pupils and budget is seconded to schools

<sup>16</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<sup>17</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<sup>18</sup> 1 x TOD

<sup>19</sup> 1 x Grade 2 Braille LSA

Number of unqualified staff (MQ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	3 <sup>20</sup>	0	0
<i>Please leave this section empty</i>				

### Rhondda Cynon Taf (RCT)

#### Provision Map RCT - Detailing Overall C&YP Numbers and SI Staffing March 2020

Number of children & young people (C&YP) supported by the LA's SI service <i>(maintained EY/LA school settings)</i>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	184	111 (23)	(2)	
Number of SI C&YP supported in specialist LA resource bases	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	9	0	0	
Number of SI C&YP supported in LA special school settings	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	13	16	2	
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	<input type="checkbox"/> increased <input type="checkbox"/> decreased			
Number of <i>fte</i> SI teachers employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3.2	2.5	0	
Number of <i>fte</i> SI support staff employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1.2	8	0	
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification (MQ)	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3.2	2.5	0	
Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	2	8		
Areas of SI provision provided, via an SLA,	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify

to another <i>local</i> LA		QTVI Mobility		
Number of specialist primary resource bases <sup>21</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	0	0	
Number of specialist secondary resource bases <sup>22</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	0	0	
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification ( <i>MQ</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1			
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify e.g. Physical Impaired Staff
	2			
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3			
Number of qualified staff ( <i>MQ</i> ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
Number of unqualified staff ( <i>MQ</i> ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1	1		
<i>Please leave this section empty</i>				

## Vale of Glamorgan

### Provision Map Vale of Glamorgan - Detailing Overall C&YP Numbers and SI Staffing March 2020

Number of children & young people (C&YP) supported by the LA's SI service ( <i>maintained EY/LA school settings</i> )	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	*95 Including	38		

<sup>21</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

	St Cyres mainstream and Cogan mainstream pupils			
Number of SI C&YP supported in specialist LA resource bases	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	14	3		
Number of SI C&YP supported in LA special school settings	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	13	22	1	
Have the numbers of C&YP on your LA's caseloads increased or decreased, in the last year?	<input checked="" type="checkbox"/> increased <input type="checkbox"/> decreased	<input checked="" type="checkbox"/> increased <input type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased	<input type="checkbox"/> increased <input type="checkbox"/> decreased
Number of <i>fte</i> SI teachers employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3 inc Specialist LA resource bases	1.3	0.2	
Number of <i>fte</i> SI support staff employed centrally	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	7 working term time only	5.2		
Number of <i>fte</i> SI teachers holding or undertaking a mandatory qualification (MQ)	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	3	7	2	1 teacher in VI and one in MSI are taking the VI course
Number of <i>fte</i> SI support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	7 BSL varying levels all at least have level 1 BSL	5	1	
Areas of SI provision provided, via an SLA, to another <i>local</i> LA	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	*3 days annually	One day per week Hab specialist to Cardiff LA	0	

<sup>22</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

Number of specialist primary resource bases <sup>23</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1*	0	0	
Number of specialist secondary resource bases <sup>24</sup>	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	1*	0	0	
Number of <i>fte</i> SI resource base teachers holding or undertaking a mandatory qualification (MQ)	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	2			
Number of <i>fte</i> SI resource base support staff holding or undertaking a specialist qualification related to HI/VI/MSI	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify e.g. Physical Impaired Staff
	0			
Number of C&YP in specialist SI/ALN placements outside the LA's maintained provision e.g. independent or NMSS schools or colleges	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	2	4		
Number of qualified staff (MQ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0	1 Hab specialist	0	
Number of unqualified staff (MQ) recruited in the last five years?	Hearing Impaired	Visually Impaired	Multi-sensory Impaired	Other - please specify
	0			
<i>Please leave this section empty</i>				

\* Included in this figure is one-off information /advice that has been sent to schools / ALNCOs for example regarding pupils diagnosed with APD. Pupils have not been seen by ST.

\* 1 pupil is seen in Heronsbridge School 6 visits annually plus report writing  
1 a pupil with a statement is seen in Howells Independent School 3 visits a year including the annual review.

## V. Comparative SI C&YP Data (*national and/or local*)

Included with this paper is selected comparative data which provides some trend indicators that highlight indicative changes, over the last 10 years. This data is taken from an annual,

<sup>23</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

<sup>24</sup> Please apply an asterisk to this section, if this aspect of the LA's service is centrally funded i.e. the funding for this provision is NOT delegated directly to schools

national survey across Wales undertaken by CRIDE (Consortium for Research in Deaf Education) since 2011 and which can be found on the [BATOD website](#).

I have also looked at the relative numbers of existing SI Service provisions across a few *local* LA. If the respective populations of each of the CSC LAs were combined it would create a total population of **1,048,991**. For comparison purposes, populations of;

<b>South Central Wales Region</b>	<b>1,048,991<sup>25</sup></b>
<b>South East Consortium Regional SI Service</b>	<b>583,483</b>
<b>Gloucestershire LA</b>	<b>916,202</b>
<b>Bristol LA (which includes BANES and South Glos.)</b>	<b>913,503</b>
<b>Oxfordshire LA</b>	<b>700,000</b>

Each of these Local Authorities operate and sustain integrated and discrete SI Service. Bristol has a consortium arrangement, but delivers its SI services to each authority, independently, rather than as one regional service.

What is more problematic to compare is the geography of each of these LAs. I suspect the infra-structures i.e. road networks in these LAs, maybe more travelable than a notional CSC region? I may, of course, be wrong with this assumption?

### **Data Population of Deaf Children - Wales**

These figures are based on an all Wales survey return, from the 22 SI Services which operate in each LA. CRIDE cannot be expected to substantiate the veracity of the data they collect from each LA i.e. the survey assumes accurate and comparative data has been provided. These data sets reflect the discrete analysis of the respective LA SI services.

**Table 1 All Wales data sets:**

<b>Year</b>	<b>No of Deaf C&amp;YP</b>	<b>+ or -</b>
2019	2,486 (5%)	decrease
2018	2,625 (0.9%)	decrease
2017	2,642 (11%)	increase
2016	2,374 (28%)	decrease
2015	3,288 (14%)	increase
2014	2,880 (0.8%)	decrease
2013	2,904 (6%)	increase
2012	2,743 (0.4%)	decrease
2011	2,755	Baseline

### **Key Findings for Wales CRIDE 2019**

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- SI Services reported that there are at least **2,486 deaf** children<sup>26</sup> in Wales; a reported **decrease of 5%** over the past year. Compare this to the CSC region; 4 out of the 5 LAs confirm an increase in deaf children numbers, in the last year.
- **80%** of school-aged deaf children attend mainstream schools (where there is no specialist provision).
- **9%** attend mainstream schools with resource provisions,
- **10%** attend special schools not specifically for deaf children.
- **1%** were home educated.
- **28%** of deaf children are recorded as having an additional special educational need.
- **6%** of deaf children use an additional spoken language other than English in the home.

Furthermore, of the C&YP (up to 19) with a severe or profound hearing loss;

- i. **66%** communicate using spoken English only in school or other education settings as their main language,*
- ii. **24%** mainly use spoken English together with signed support.*
- iii. **3%** mainly use spoken Welsh,*
- iv. **1%** mainly use spoken Welsh together with signed support.*
- v. **6%** mainly use British Sign Language.*

- The most common post-school destination for deaf young people is further education, with **54%** taking this option across Wales.
- There are at least **66 fte** Teacher of the Deaf posts with no LA having a vacancy (at the time of the survey); of these **66** staff working as Teachers of the Deaf, **86%** held the mandatory qualification i.e. **14%** staff **did not** hold an MQ
- The number of qualified Teachers of the Deaf in employment working in a peripatetic or advisory teacher role, in a resource provision and/or in a special school or college not specifically for deaf children, has increased slightly by **1%** over the past year.
- Notwithstanding this, over the long-term, it has **fallen** by **21% (one fifth)** since the CRIDE survey started in 2011.
- Peripatetic or advisory Teachers of the Deaf have an average theoretical caseload of **59 deaf children**. This has **decreased** from **73 in 2017** and from **71 in 2015**.
- **45%** of peripatetic Teachers of the Deaf are over the **age of 50** and therefore are likely to retire in the next **10 to 15 years**.

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<sup>26</sup> Please note that for the purpose of this section of the survey we use the term 'children' to include children and young people up to the age of 19 years, 11 months (unless specified in the question).

- There are at least **100.55 fte** other specialist support staff working with deaf children in Wales, an increase from **87.7** reported in **2017**.
- Fewer MQ Teachers but more trained support staff – is this an artefact of the ageing MQ population or a change in how C&YP with SI are supported?
- There are **24** resource provisions across all 15 services; this represents a decrease from **2018**. A positive indicator of successful inclusion.
- **27%** of services report that they collect data on Key Stage 4 outcomes for all deaf children. The same proportion does the same, but only for deaf children on their caseload.

### The Population of Visually Impaired Children – (English data) 2019

Turning to the data for C&YP with visual impairments; lamentably, I can only access/find detailed statistics specific for visually impaired C&YP in England.

The only data I can trace on visual impairments for C&YP in Wales includes no discrete stats on C&YP.

Consequently, I am assuming that the corresponding data for C&YP living/educated in Wales, follows the equivalent trends to those in England. This data is taken from the Welsh Schools census (StatsWales).

England - total population - **57,000,000m** ~ school population **8,890,357 (15.5%)**

Wales - total population - **3,316,000** ~ school population **435,280 (13.1%)**

### Key findings

- **12,687** pupils with an EHCP or on 'SEN support' were recorded as having VI as their primary SEN. This is **397 more pupils** with VI as their primary SEN than were recorded in 2018.
- Pupils with VI as their primary SEN represented **0.16%** of the total pupil population in 2019.
- This is **lower than the 0.2%** prevalence estimate of VI based upon the WHO classification of childhood VI and blindness.
- The majority of pupils with VI as their primary SEN (**73.4%**) were on 'SEN support'; only **26.6%** had an Education, Health and Care Plan (EHCP) or statement.
- **55.3%** of pupils with VI as their primary SEN were boys. In comparison, within the whole population of pupils with SEN, **66.5% were boys**.
- **74.5%** of pupils with VI as their primary SEN were White, and **69.5%** were classified as White British, while **13.9%** were Asian.

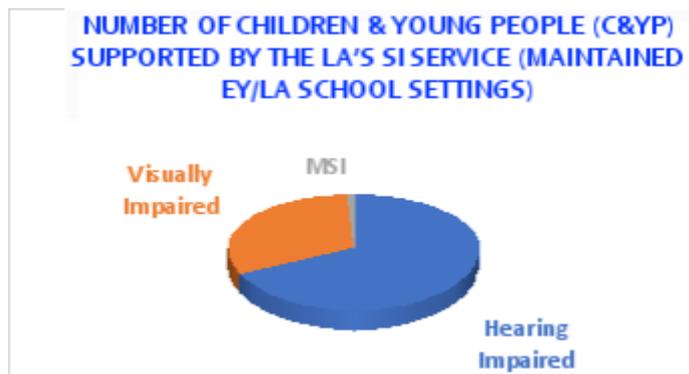
- **17.5%** of pupils with VI as their primary SEN spoke a language other than English as their first language. **16.3% of all pupils** with SEN spoke a language other than English as their first language.
- One in two (**49%**) pupils with VI as their primary SEN attended primary schools in 2019; **44.3%** were in secondary education and **6.7%** went to special schools.

This compares with **55.5%** of all pupils with SEN who were in primary schools, **34.2%** in secondary education and **10.3%** in special schools in 2019

- **384** special schools in England had approved provision for pupils with VI in 2019. Only **844** pupils with VI as their primary SEN were recorded as attending special schools in 2019.
- **24%** of pupils with VI as their primary SEN were entitled to and claiming free school meals (FSM) in 2019. This compares with **28.3%** of all pupils with SEN and **15.4%** of all pupils who were entitled to and claiming FSM.

**In summary in, January 2019**, the number of pupils recorded with VI as their primary SEN (England) was **12,687**. This is **798** more than were recorded in 2017 and **397** more than in 2018. The 3-years trend infers that the number of pupils with a VI (England) is increasing, year in year.

### Pie Chart of Region Sensory Impairment Population



### Key headlines:

- ✍ *Four out of the five LAs report increases in HI/VI populations, over the last five years.*
- ✍ *A high number of teachers holding MQ (or undergoing mandatory training) - 29.6 FTE.*
- ✍ *High numbers of qualified support staff (or undergoing training) to compliment teachers - 36.9.*
- ✍ *17% of HI/VI/MSI C&YP attend special school placements.*
- ✍ *7% of HI/VI/MSI C&YP attend resources bases (not necessarily SI specific).*
- ✍ *9 C&YP attend out of authority placements – the **average** cost for a residential placement £120,000k ([Baker-Tilley Report 2012](#)) suggesting total (average) cost across the region = £1,080,000m.*
- ✍ *All the LAs should be commended for their unambiguous commitment to employing /recruiting and/or training teachers and support staff, in SI.*

**VI. Articles/websites and references used to support the publication of this document.**

1. WLGA Publications - Collaboration and Regionalisation  
<http://www.wlga.wales/sharedfiles/PublicationLibrary.aspx?topic=520>
2. Support for children and young people with vision impairment in educational settings - <https://gov.wales/sites/default/files/publications/2019-12/191209-support-for-children-and-young-people-with-vision-impairment-in-educational-settings.pdf>
3. DfE/View Data (England) - <https://viewweb.org.uk/dfe-official-data-children-young-people-vision-impairment/>
4. BATOD data - <https://viewweb.org.uk/dfe-official-data-children-young-people-vision-impairment/>