



## RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

### PRIVATE CABINET

11TH SEPTEMBER 2023

### CONSULTATION ON THE PROPOSALS TO REALIGN ADDITIONAL LEARNING NEEDS MAINSTREAM LEARNING SUPPORT CLASS PROVISION WITHIN RHONDDA CYNON TAF

#### REPORT OF THE DIRECTOR OF EDUCATION AND INCLUSION SERVICES IN DISCUSSION WITH THE CABINET MEMBER FOR EDUCATION, YOUTH PARTICIPATION AND WELSH LANGUAGE (COUNCILLOR R LEWIS)

**AUTHOR:** Ceri Jones, Head of Inclusion Services

#### 1. PURPOSE OF THE REPORT

- 1.1 The purpose of the report is to advise Members of the outcome of the recent consultation in respect of the proposal to realign the mainstream Learning Support Class (LSC) provision within Rhondda Cynon Taf (RCT).

#### 2. RECOMMENDATIONS

It is recommended that the Cabinet:

- 2.1 Note the information contained within the attached consultation report, which includes a summary of items of correspondence received during the consultation exercise and notes of the various meetings held.
- 2.2 Agree to progress the following proposals to realign the mainstream Learning Support Class (LSC) provision within Rhondda Cynon Taf (RCT) by issuing the appropriate statutory notices.
  - 2.2.1 **Proposal 1 (amended):** To relocate the Observation and Assessment LSC at Penrhiwceiber Primary School to Abercynon Community Primary School taking effect from September 2024. *(Amended from April 2024).*
  - 2.2.2 **Proposal 2 (amended):** To transfer the LSC for pupils in Years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Community Primary School to create a through provision in the Primary Phase at Perthcelyn Primary School taking effect from September 2024. *(Amended from April 2024).*

2.2.3 **Proposal 3:** To establish one Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School taking effect from April 2024.

2.2.4 **Proposal 4:** To establish two Welsh medium primary phase LSCs at the new Welsh medium primary school in Rhydyfelin for pupils with significant ALN taking effect from September 2024.

2.2.5 **Proposal 5:** To establish one LSC for pupils in years 7-11 with ASD at the new 3-16 school on the Hawthorn Primary/High School site taking effect from September 2024.

### **3. REASONS FOR RECOMMENDATIONS**

3.1 To progress the proposal in accordance with the process outlined in Welsh Government legislative guidance (School Organisation Code (2nd Edition) (011/2018)) so that an improved continuum of ALN provision can be achieved in RCT.

3.2 To ensure that the Council undertakes its statutory duties in relation to the ALNET Act (2018) that requires local authorities to keep under review the arrangements for supporting pupils with ALN within their area and consider whether these are sufficient, including a statutory requirement to take all reasonable steps to create a bilingual system of support for pupils with ALN.

3.3 To support the Council's delivery of its Welsh in Education Strategic Plan (WESP) and the Education Directorate Strategic Plan 2022-2025.

### **4. BACKGROUND**

4.1 Members will recall that, at the meeting of Cabinet held on 3<sup>rd</sup> May 2023, approval was given to begin a process of formal consultation on a proposal to realign the mainstream Learning Support Class (LSC) provision within Rhondda Cynon Taf (RCT).

4.2 For pupils with more significant needs for whom it is challenging to make appropriate learning provision within mainstream education, more specialist placements are required. RCT has a range of specialist provisions which includes: 45 LSCs, 2 Pupil Referral Units (PRUs) and 4 Special Schools. RCT has an excellent range of LSC provisions attached to mainstream schools. However, it has become increasingly apparent that the range of LSC provisions currently available is disproportionate to the level of need in some areas.

4.3 Data analysis confirms that:

- there is currently insufficient provision in the secondary sector for pupils with ASD;
- the absence of cross phase specialist provision on some school sites means that some learners experience unnecessary transitions;
- one LSC would benefit from relocation to fully accessible schools that have benefited from the Sustainable Communities for Learning investment;

- there is insufficient provision to meet the needs of learners in the early years.

In light of these findings, the proposals for change seek to achieve the following aims:

- developing a robust continuum of provision that effectively addresses a wide range of need across all year groups;
- avoiding unnecessary transition across schools by establishing cross phase specialist provisions within individual schools where possible;
- establishing LSC provisions in fully accessible settings that provide a learning environment fit for the 21<sup>st</sup> Century.

- 4.4 Implementing this proposal will be of benefit to Welsh medium pupils with significant ALN across RCT and will ensure greater equality and access to specialist provision. The priority for the Education and Inclusion Service Directorate is to continue to focus on driving up standards in schools and to improve the outcomes for all children and young people. In light of the Welsh Government ALN Transformation Agenda and the Council's vision to increase the number of Welsh medium learners in its schools by responding proactively to both national and local strategies, such as the Welsh Government Welsh Language Strategy: Cymraeg 2050, Rhondda Cynon Taf's Welsh in Education Strategic Plan and the current 21<sup>st</sup> Century Schools plan to increase and improve Welsh medium provision RCT, it is essential to enhance current Welsh medium ALN provision within RCT.
- 4.5 There is a clear need to expand our Early Years and Key Stage 3/4 ASD provisions. In addition, the current location of the Penrhiwceiber LSC is felt to be no longer suitable to meet the needs of the new curriculum within a fully accessible environment. The proposed relocation of Penrhiwceiber LSC will ensure that pupils have access to premises which are more accessible and better equipped to meet a range of needs. The proposal will ensure greater compliance with the Equality Act 2010 and access to significantly improved premises which have benefited from the Council's School Modernisation Programme and investment.
- 4.6 The relocation of the LSC for pupils with ASD from Abercynon Community Primary to Perthcelyn Community Primary will eliminate unnecessary transition for pupils needing specialist LSC provision throughout the primary phase, providing equity for them to remain in one setting until transition to secondary provision in line with mainstream peers.
- 4.7 In Abercynon LSC, the number of pupils attending the LSCs in September 2023 that will be affected by the proposed relocation is very low: 6 pupils (1 x year 6, 5 x year 4). This age profile of these learners by September 2024, the proposed implementation date of these proposals, will be 5 x Year 5 learners. In the event of parental opposition to a relocation of their children's provision to the proposed Perthcelyn LSC, supported mainstream placements in the existing settings can be explored in partnership with the school and Access and Inclusion Service staff.

In Penrhiwceibr LSC there are currently 9 pupils (1 x year 1, 4 x reception, 4 x nursery). However, placements at Penrhiwceibr Observation and Assessment Class are intended to be short-term and it is highly likely that the majority of the 9 pupils referenced above will have moved on to their long-term educational placement before the proposed implementation date of September 2024.

## **5. CONSULTATION**

- 5.1 The consultation in respect of these proposals was undertaken between 5<sup>th</sup> June and 14<sup>th</sup> July 2023 under the arrangements outlined in the Welsh Government's School Organisation Code. These arrangements stipulate that a Consultation Report must be prepared prior to the publication of any statutory notices which will progress the proposal. It further states that this Report must be published within 26 weeks of the end of the consultation period, which is 12<sup>th</sup> January 2024 in this instance.
- 5.2 The Consultation Report in respect of this particular proposal is attached at Appendix 1. A number of key issues that were raised in the consultation feedback have been identified as recurring themes to which the LA has provided a collective response in section 6 of the Consultation Report. For details of correspondence received please refer to Appendix 1a. Information in respect of meetings held to discuss the proposals, with copies of the notes taken at these meetings that outline the main areas of discussion are included at Appendix 1b.
- 5.3 It is noted that there has been a good response to this consultation which consisted of 127 completed questionnaires in relation to all proposals, 12 letters/emails and 3 petitions were received in relation to Proposal 2 (the relocation of the Autistic Spectrum Disorder (ASD) Learning Support Class at Abercynon Community Primary School to Perthcelyn Primary School). A further online petition in relation to Proposal 2 was submitted after the deadline and has not been accounted for. 53 Pupil School Council representatives attended meetings with Access and Inclusion Service staff and approximately 20 parents attended open evenings held to provide further information.
- 5.4 Responses to the consultation are summarised below. All responses have been shared with Cabinet for full disclosure and transparency. For further detail refer to the Consultation Response Report:
- **Proposal 1** - To relocate the Observation and Assessment LSC at Penrhiwceibr Primary School to Abercynon Community Primary School of the 126 submissions received in relation to this proposal: 28 responders agreed to the proposal, 85 disagreed and 13 were unsure how to respond.
  - **Proposal 2** - To transfer the LSC for pupils in years 3-6 with ASD at Abercynon Community Primary School to create a through provision in the Primary Phase at Perthcelyn Primary School of the 127 submissions received in relation to this proposal: 45 responders agreed to the proposal, 88 disagreed and 9 were unsure how to respond.
  - **Proposal 3** - To establish one Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs

at Abercynon Primary School of the 121 submissions received in relation to this proposal 45 responders agreed to the proposal, 52 disagreed and 24 were unsure how to respond.

- **Proposal 4** - To establish two Welsh medium primary phase LSCs at the new Welsh medium primary school in Rhydyfelin for pupils with significant ALN of 120 submissions received in relation to this proposal 54 responders agreed to the proposal, 36 disagreed and 30 were unsure how to respond.
- **Proposal 5** - To establish one LSC for pupils in years 7-11 with ASD at the new 3-16 school on the Hawthorn Primary/High School site of the 119 submissions received in relation to this proposal 54 responders agreed to the proposal, 37 disagreed and 28 were unsure how to respond.

5.5 The following key themes emerged from the consultation for further detail and responses refer to the Consultation Response Report:

- **Proposal 1:** Observation and Assessment LSC at Penrhiwceiber Primary School to relocate to Abercynon Community Primary School.
  - The proposal was seen as positive with the proposed move providing access to enhanced facilities and resources for pupils in the LSC;
  - Concerns were raised regarding the number of transitions pupils need to undertake. However, it is highly likely that existing learners placed in short-term placements in the Penrhiwceiber LSC will have secured long term placements by the proposed implementation date.
- **Proposal 2:** LSC for pupils in years 3-6 with ASD at Abercynon Primary Community School to relocate to Perthcelyn Primary School to create a through Primary Phase provision.
  - Parents felt that pupils attending the LSC in Abercynon Community Primary School had access to a variety of community resources that would be lost should the proposal be progressed;
  - Much praise has been given to the current provision and support within both Abercynon and Perthcelyn Learning Support Classes;
  - Through provision for pupils with ASD provision were widely welcomed however the location of the class was questioned. Parents of pupils currently attending the LSC in Abercynon wish for the LSC to remain and to relocate Perthcelyn LSC to Abercynon. Parents of pupils currently attending the LSC at Perthcelyn are in support of the proposal to relocate the ASD provision from Abercynon to Perthcelyn to ensure through primary phase provision is available to their children without the need to transition further.
- **Proposal 3:** One Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School:
  - Positive responses were received regarding the increased capacity the LSC would provide although responders queried whether further capacity was needed;

- Mixed feedback was received regarding the location of the proposed new LSC provision some responses were in support of the Early Years LSC being established at Abercynon whilst other responses suggested the LSC should be established at a different location.
- **Proposal 4:** Two Primary Phase Welsh medium LSCs at the new Welsh medium primary school at Rhydyfelin for pupils with significant ALN:
  - Welsh medium LSCs are welcomed but concerns were raised relating to the LSC not having a specific ALN designation.
- **Proposal 5:** One ASD LSC provision for pupils in years 7–11 at the new 3-16 school on the Hawthorn Primary/High School site:
  - The increase in Key Stage 3/4 provision was seen as positive, however responders felt further LSCs are needed.

## 6. THE STATUTORY PROCESS

6.1 The statutory notices for this proposal will refer to the:

- **Proposal 1:** Relocation of the Observation and Assessment LSC at Penrhiwceiber Primary School to Abercynon Community Primary School taking effect from September 2024.
- **Proposal 2:** Transfer of the LSC for pupils in years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Community Primary School to create a through provision in the Primary Phase at Perthcelyn Primary School taking effect from September 2024.
- **Proposal 3:** Establishment of one Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School. The proposal will take effect from April 2024.
- **Proposal 4:** Establishment of two Welsh medium primary phase LSCs at the new Welsh medium primary school in Rhydyfelin for pupils with significant ALN. The proposal will take effect from September 2024.
- **Proposal 5:** Establishment of one LSC for pupils in years 7-11 with ASD at the new 3-16 school on the Hawthorn Primary/High School site taking effect from September 2024.

6.2 The Statutory Notices will, if agreed, be published on 9<sup>th</sup> October 2023 and will allow for a 28 day period for objections, ending on 5<sup>th</sup> November 2023. If any objections are received, in accordance with the aforementioned Code an Objections Report will be prepared. This matter will then be reported to a future meeting of Cabinet, possibly in December 2023, for Members to receive and consider the Objections Report and to make a final decision on this proposal.

## 7. EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 The relevant Equality Impact Assessment and Community Impact Assessment were published on the Council's website together with the consultation document that outlined the proposal in detail. The assessments have been updated following the consultation. Copies of the updated assessments are attached as Appendix 2 and 3 to this report.

## **8. WELSH LANGUAGE IMPLICATIONS**

- 8.1 A Welsh Language Impact Assessment has been prepared in respect of this proposal and published on the Council's website as a part of the Consultation Documentation in accordance with the requirements of Welsh Government's School Organisation Code (2nd Edition) (011/2018) (the "Code"). A copy of the updated assessment is attached as Appendix 4.

## **9. FINANCIAL IMPLICATIONS**

- 9.1 If the proposal to realign LSC provision within RCT is authorised to proceed, resources will be directed to address the identified gaps in existing provision.
- 9.2 The proposals will address capacity pressures in relation to pupils with significant ALN in the Early Years and years 7–11 (formerly Key Stage 3/4), reduce the number of transitions necessary for pupils accessing Primary Phase LSC provision and ensure a higher number of LSCs are situated within 21st Century School environments. The proposals also seek to address the need to create additional Welsh medium specialist LSC provision, in line with the requirements of the Additional Learning Needs Education Tribunal (ALNET) Act (2018) to develop a bilingual Additional Learning Needs (ALN) system.
- 9.3 Secondary schools hosting LSCs for pupils with ASD are funded via the Council for one specialist teacher and two learning support assistants at an approximate cost of £131,500k per annum per class. Primary schools hosting Early Years LSC's are funded for one teacher and one learning support assistant at an approximate cost of £97,600k per annum. Primary phase Welsh provisions will be funded for one teacher and one learning support assistant at an approximate cost of £97,600k each per annum. To ensure the LA is able to meet the needs of its ALN pupils, funding of approximately £424k is required annually and will be incorporated in the Council's Medium Term Financial Planning arrangements.
- 9.4 The creation and relocation of the LSCs will incur a transportation cost in line with the Council's Learner Travel Policy, however this increase in cost is seen as a necessity in order to enhance provision for RCT's most vulnerable pupils. Costs cannot be quantified at this time as placements are pupil led however given that there will be a net increase in the number of LSC provisions additional funding is likely to be required and will be incorporated in the Council's Medium Term Financial Planning arrangements.

## **10. LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED**

- 10.1 Section 316A of the Education Act 1996 specifies that children with SEN/ALN should normally be educated in mainstream schools if this is compatible with them receiving the special educational/additional learning provision that their learning

difficulty requires; the efficient education of other children, and the efficient use of resources.

- 10.2 Section 315 of the Education Act 1996 also requires local authorities to ensure that SEN/ALN provision is kept under review. The ALN Code for Wales (2021) places a statutory duty upon the LA to keep under review the overall Additional Learning Provision (ALP) available in its area and supporting arrangements, to ensure provision is sufficient to meet the overall needs of its population of learners with ALN and that provision is available in Welsh.

## **11. LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELL-BEING OF FUTURE GENERATIONS ACT**

- 11.1 The proposals will ensure that two of the Council's three key priorities will be met. These include:
- Economy: Building a strong economy.
  - People: Promoting independence and positive lives for everyone.
- 11.2 There are links to RCTCBC's Education and Inclusion Services Strategic Plan for 2022 to 2025 and its mission: '*To deliver equity and excellence in Education and enhanced well-being for all*'. The proposal will also support delivery against the five strategic priorities, most notably:
- Strategic Priority 2: Supporting educational settings to deliver a transformational curriculum, high quality teaching and learning and improved outcomes for all.
  - Strategic Priority 3: Ensuring equity and support for vulnerable learners and their families.
  - Strategic Priority 5: Delivering 21<sup>st</sup> Century Learning Environments and innovative services for our learners and communities.
- 11.3 The proposals will ensure there is renewed capacity to focus on prevention which is a key statutory requirement of the Wellbeing and Future Generations Act and a key element of the Council's Corporate Plan.
- 11.4 Due regard has been made to all seven wellbeing goals and the five ways of working, as contained within the [Wellbeing of Future Generations \(Wales\) Act 2015](#) which requires the Council to think about the long-term impact of decisions on communities to prevent consistent issues such as poverty, health inequalities and climate change.
- 11.5 The proposal could contribute towards achieving some of the seven wellbeing goals by:
- **A Healthier Wales** – Accommodation at the proposed host schools will continue to support opportunities for enhanced outdoor spaces. As well as supporting the full range of curriculum activities these facilities are also available for community use.
  - **A More Equal Wales** – Providing enhanced opportunities for pupils to access specialist provision.



- **A Wales of More Cohesive Communities** – All host schools are fully accessible and integrated community school with a dedicated area designed within so that the local community can safely use the facilities, both during and after the school day.
- **A Wales of Vibrant Culture and Thriving Welsh Language** – establishing new primary phase Welsh medium LSC provision will support of the Council's WESP.
- **A Globally Responsive Wales** – pupils will have access to extra-curricular activities which encourage healthy lifestyles for the school and wider community.

11.6 The proposal could contribute towards achieving some of the five ways of working by:

- **Long Term** – To ensure that the Council undertakes its statutory duties in relation to the ALNET Act (2018) that requires local authorities to keep under review the arrangements for supporting pupils with ALN within their area and consider whether these are sufficient, including a statutory requirement to take all reasonable steps to create a bilingual system of support for pupils with ALN.
- **Prevention** – The Council believes that the proposal represents the best opportunity to safeguard and sustain educational standards for the future and provides a platform for further improvement.
- **Integrations** – Host schools are fully accessible and integrated community schools.
- **Collaboration** – The Council will continue to work effectively with internal and external partners to ensure the changes brought about by these proposals will meet the short and long term needs of pupils, parents/carers, staff and the wider community.
- **Involvement** –The proposal is made in accordance with the [School Organisation Code \(2<sup>nd</sup> Edition\) \(011/2018\)](#) and seeks the views of a prescribed list of stakeholders including pupils, parents/carers, staff and the wider community. As such face to face meetings will be arranged with the staff, school councils and governing bodies.

11.7 As stated in 7.1, an Equality Impact Assessment which further details the contribution of the proposal to the [Wellbeing of Future Generations \(Wales\) Act 2015](#) is being prepared.

11.8 The information in the report contributes to the priorities within RCTCBC's Corporate Plan, 'Making a Difference'.

11.9 The proposals will also assist the directorate in achieving Outcome 6 of the Welsh in Education Strategic Plan (WESP), which is to increase the provision of Welsh medium education for learners with ALN.

## 12. **STRATEGIC OR RELEVANT TO ELECTORAL WARDS**

12.1 Given the considerable changes in Wales in relation to the statutory provision required to meet the needs of learners with the implementation of the ALNET Act (2018) and the ALN Code (2021) the above proposals to secure additional capacity and resources will ensure that the Council successfully delivers on its statutory obligations, and as such is a strategic proposal relevant to all wards.

### **13. CONCLUSION**

13.1 The proposals to realign LSC provision will ensure that RCT has undertaken its statutory duty under the ALNET Act (2018) to review arrangements for supporting pupils with ALN within the county borough and has identified necessary steps to ensure the sufficiency of its provision for pupils with significant ALN who require specialist placement.

13.2 The proposals support the delivery of the RCT WESP and one of the core aims of the ALNET Act by working towards the development of a fully bilingual ALN system within the county borough.

13.3 The proposals will ensure greater compliance with the Equality Act 2010 and access to significantly improved premises which have benefited from the 21<sup>st</sup> Century Schools Modernisation Programme and investment.

13.4 Following consideration of the responses to the consultation, it is recommended that Members agree to the immediate publication of the attached Consultation Report and agree to give officers approval to publish the appropriate Statutory Notices to progress with the proposals, noting the modification made to the implementation dates of Proposals 1 and 2.

#### **Other Information:**

##### ***Relevant Scrutiny Committee:***

Education and Inclusion Scrutiny Committee

##### ***Contact Officer:***

Ceri Jones, Head of Inclusion Services

**LOCAL GOVERNMENT ACT 1972**

**AS AMENDED BY**

**THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**A DISCUSSION PAPER FOR A PRIVATE MEETING OF THE CABINET**

**11<sup>TH</sup> SEPTEMBER 2023**

**Item: CONSULTATION ON THE PROPOSALS TO REALIGN ADDITIONAL  
LEARNING NEEDS MAINSTREAM LEARNING SUPPORT CLASS  
PROVISION WITHIN RHONDDA CYNON TAF**

**Background Papers  
Appendix 1 – Consultation Report**

**Officer to contact:  
Ceri Jones, Head of Inclusion Services**



CYFLAWNI **TEGWCH** A **RHAGORIAETH** MEWN **ADDYSG** A **GWELL LLES** I BAWB  
**EQUITY** AND **EXCELLENCE** IN **EDUCATION** AND **ENHANCED WELLBEING** FOR ALL

**CONSULTATION ON THE PROPOSALS TO REALIGN  
ADDITIONAL LEARNING NEEDS MAINSTREAM  
LEARNING SUPPORT CLASS PROVISION WITHIN  
RHONDDA CYNON TAF**

**JULY 2023**

# Consultation Report

## Proposal: to re-align Learning Support Class (LSC) provision within Rhondda Cynon Taf

### 1. Purpose of the Consultation Report

This report is prepared in accordance with the Welsh Government's School Organisation Code. Its purpose is to inform the outcome of the consultation held during the period 7<sup>th</sup> June and 14<sup>th</sup> July 2023 between all stakeholders and interested parties listed below.

### 2. Who did we consult?

A copy of a consultation document which fully outlined and explained our proposal was sent to the following stakeholders. The document was also published on the Council website at [www.rctcbc.gov.uk/schoolconsultations](http://www.rctcbc.gov.uk/schoolconsultations)

- The Governing Bodies, parents, carers and staff of Abercynon Community Primary School, Penrhiwceiber Primary School, Perthcelyn Primary School
- The Temporary Governing Body of the new 3-16 school on the Hawthorn Primary/High site and the new Welsh medium through school.
- Other Governing Bodies of neighbouring primary and secondary schools
- School Councils of Abercynon Community Primary, Perthcelyn Primary, Penrhiwceiber Primary, Heol-Y-Celyn, Hawthorn Primary, Hawthorn High
- The Church in Wales and Roman Catholic Diocesan Authorities
- The Governing Body of Coleg Y Cymoedd
- The Governing Body of the University of South Wales
- Welsh Minister for Education and Skills
- Assembly Members for all constituencies and regional areas serving Rhondda Cynon Taf
- Members of Parliament for the Rhondda, Pontypridd and Cynon Valley
- Estyn
- Cwm Taf Local Health Board
- Teaching and Support staff trade unions
- Central South Consortium Joint Education Service
- South Wales Police and Crime Commissioner
- The Early Years and Childcare Partnership
- South East Wales Transport Association
- The local Communities First Partnerships
- The Welsh Language Commissioner
- Neighbouring local authorities

### 3. What did we consult on?

The proposals consulted on included:

**Relocating key LSC provisions to ensure cross phase provisions in single sited, accessible school buildings. It was proposed that the following relocations take effect from April 2024:**

- **Proposal 1:** Observation and Assessment LSC at Penrhiwceiber Primary School to relocate to Abercynon Community Primary School.
- **Proposal 2:** LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Primary Community School to relocate to Perthcelyn Primary School to create a through Primary Phase provision.

**Developing new LSC provisions. It was proposed that the new LSCs established from September 2024:**

- **Proposal 3: One** Early Years Assessment & Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School.
- **Proposal 4:** Two Primary Phase Welsh medium LSCs at the new Welsh medium primary school at Rhydyfelin for pupils with significant ALN.
- **Proposal 5:** One ASD LSC provision for pupils in Years 7–11 at the new 3-16 school on the Hawthorn Primary/High School site.

### 4. The consultation process

All stakeholders identified in section 2 were sent electronic copies of the consultation documentation with the consultation proforma link and those that requested paper copies received them. All feedback received are detailed in Appendix 1a. Consultation meetings were held for the staff, parents and pupils of the affected schools, the details and dates of these meetings are attached as Appendix 1b. Summary notes taken during a range of consultation events are detailed in Appendix 1c. These provide a record of questions raised, comments and statements made, with responses provided where appropriate.

### 5. Summary of responses to consultation

It is noted that there has been a good response to this statutory consultation process; 127 completed questionnaires, 12 letters/emails and 3 petitions. A further online petition was submitted by the Perthcelyn Community, however it has not been considered as it was received after the deadline.

Table 1 below reports the number of responses received to each element of the proposal, please note that the number of disagree responses relating to the LSC for Key Stage 3/4 ASD pupils, the 2 proposed Welsh medium provisions and the relocation of

Penrhiwceiber LSC could potentially be distorted as nearly all comments received relate to the proposed changes to the LSCs at Abercynon Community Primary and Perthcelyn Primary Schools and not the proposed addition of Welsh medium and a Key Stage 3/4 ASD provision.

In accordance with the Equality Act 2010 and the Public Sector Equality Duties, the Council has a legal duty to look at how its decisions impact on people because they may have particular characteristics. So as part of seeking views on the school organisation proposals, the consultation also included a question in compliance with the Council's statutory obligations asking 'how would the Council's proposal affect you? All those that responded to this question stated that there would be a positive or no impact on them as a result of implementing the proposals.

In addition, the consultation survey, in accordance with the Welsh Standards (No.1) Regulations 2015, also included further questions in compliance with the Council's statutory obligations which asked could the proposals impact opportunities for people to use and promote the Welsh Language (Positive or Negative) and if in any way, they treat the Welsh Language less favourably than the English Language? Also asked were how positive effects could be increased, or negative effects be decreased? All those that responded to these questions stated that there would be a positive or no impact on the Welsh Language as a result of implementing the proposals.

**Table1: Responses to the proposed realignment of LSC provision within RCT**

Proposal	Communication Received			Nature of Responses		
	Online Questionnaire	Letter/ Email	Petition	Agree	Disagree	Not Sure
Observation and Assessment LSC at Penrhiwceiber Primary School to relocate to Abercynon Community Primary School.	126	0	0	28	85	13
LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Primary Community School to relocate to Perthcelyn Primary School to create a through Primary Phase provision.	127	12	3	45	88	9
One Early Years Assessment & Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School.	121	0	0	45	52	24
Two Primary Phase Welsh medium LSCs at the new Welsh medium primary school at Rhydyfelin for pupils with significant ALN.	120	0	0	54	36	30
One Autistic Spectrum Disorder LSC provision for pupils in Years 7-11 at the new 3-16 school on the Hawthorn Primary/High School site.	119	0	0	54	37	28

The table below reports the number and type of responses received for each individual proposal within the consultation document:

## 6. Summary of Key Themes Raised and LA Responses

In accordance with the Code, a summary of the responses received are detailed in the table below and where issues have been raised, these have been responded to, where applicable, by means of clarification with supporting reasons. The key themes emerging from this analysis are detailed as follows:

- **Proposal 1:** Observation and Assessment LSC at Penrhiwceiber Primary School to relocate to Abercynon Community Primary School

Comments/Issue raised	Response to comments/issued raised
Suggested the LSC at Penrhiwceiber Primary School is moved to Perthcelyn Primary School.	This was considered however not all pupils in the Observation and Assessment class would require long term placement in an ASD LSC and would therefore not transition into the ASD LSC in Perthcelyn. In addition, this would mean that pupils in Perthcelyn ASD LSC would still need to transition from Perthcelyn to the ASD LSC at Abercynon Primary School. One of the underpinning aims of the proposal is to reduce the number of transitions incurred by pupils in ASD LSCs.
Positive proposal to move the LSC from Penrhiwceiber to Abercynon due to the availability of enhanced facilities and resources for pupils in the LSC.	Positive comments are noted and reflect the rationale for the proposed relocation.
Suggested that the relocation is not undertaken.	The facilities at Penrhiwceiber LSC are not appropriate to meet the requirements of the new curriculum for Wales and are not sited within a 21 <sup>st</sup> Century learning environment.
Number of transitions pupils are required to make.	Concerns have been raised that the proposals will have a negative impact on pupils and may require some pupils to undertake additional transitions to another setting. However, it is important to highlight that all learners accessing Observation and Assessment placements do so on a short term basis whilst their needs are being assessed and identified to inform a longer term placement.  Robust transition plans will be put in place for any pupils directly affected by the proposals, which will be planned collaboratively with parents and staff and involve additional support



	from specialist members of staff from Access and Inclusion.
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- **Proposal 2:** LSC for pupils Years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Primary Community School to relocate to Perthcelyn Primary School to create a through Primary Phase provision.

Comments/Issue raised	Response to comments/issued raised
Impact of proposals upon pupils due to transfer in September 2023 to the LSC currently based at Abercynon Community Primary School in September.	The proposed change in provision has some implications for a small number of pupils (currently 3 pupils) who currently attend an affected LSC but were due to transfer to Abercynon LSC in September 2023. To minimise any potential negative impact upon individual pupils, parents have been provided with the option to move to Abercynon LSC or to remain in Perthcelyn with additional support provided within the current Perthcelyn ASD LSC in September 2023. These arrangements will remain in place until a decision regarding the proposal has been reached, parents have been made fully aware of the implications of the option they have chosen.
Positive provision and support within both Abercynon and Perthcelyn Learning Support Classes.	The LA has been delighted to receive such positive feedback on the LSC provisions at Abercynon Community School and Perthcelyn Primary School. It is evident that both classes are an integral part of the school community, staff and pupils are valued and that parents are delighted with the progress pupils are making.
Community resources available within Abercynon Community Primary School.	Significant emphasis has been raised in relation to the perceived advantages of one community to another. All schools are required within the new Curriculum for Wales to develop their individual curriculum building on the opportunities available in the school's locality. Due to this requirement each curriculum will be unique to each setting but there is an expected consistency in the range of learning opportunities and the specialist provision available in LSCs.  It must be noted that both LSCs are thriving and as noted above it has been pleasing to receive such positive feedback regarding both provisions during this consultation.
Perception within community that the proposals are as a result of letter submitted to the LA.	The proposals have been undertaken in line with the Welsh Government requirement for each LA to review the sufficiency of its ALN provision and whilst feedback from the community is always welcomed and

	considered the proposals have not been unfairly influenced by specific community representations. A balanced and measured approach has been adopted with full transparency.
Concerns regarding the quality of relocated LSC provision where LSC provision has currently been considered to be effective.	The LA has no evidence to suggest that the mainstream school to which the LSCs is proposed to relocate will not be able to provide high quality, inclusive educational and extra-curricular opportunities to the pupils in the LSC. The school currently successfully hosts a LSC and the proposed relocation would merely enhance their LSC provision. The proposed mainstream host school has a strong leadership team with established quality assurance processes within RCT and the wider Central South Consortium. Access and Inclusion also has well established Quality Assurance processes for monitoring and challenging the performance of all of its individual LSCs and this process would continue following the proposed relocation of provision.
Through provision for pupils with ASD provision were widely welcomed however the location of the class was questioned.	The proposed relocation will ensure that pupils will be able to have cross phase provisions within a setting that has well established LSC provision. The proposal will also create enhanced opportunities for collaborative working between the LSCs within different phases which will benefit both pupils and staff in sharing expertise.
Specific questions were raised in one consultation response:  1. How will their children continue to have the same opportunities that they enjoy now? Such as weekly library visits, trips to the local shops, time at the organics garden, swimming once a week, horse riding attended through use of private minibus.  2. What plans do the authority have to support children who have had negative experiences of Perthcelyn school in the past?	In line with new curriculum for Wales, the curriculum is designed by the school to build on the opportunities available in the school's locality. This will be unique to each setting but there is an expected consistency in the range of learning opportunities and the specialist provision available in LSCs and beyond.  As the current LSC staff will be moving with the pupils they will work with Access & Inclusion to ensure a robust transition process will be put in place. This will ensure there is continuity in staffing and support for pupils to support both their educational provision and wellbeing. The LSC will continue to be monitored collaboratively by school and the LA through its

<p>3. What impact assessment has been done on the children with ASD who would be expected to move from their current school? (This is a small group of children who will be negatively impacted by the proposed changes and the parents felt very passionately that the proposals will have a devastating effect on this small group of children.)</p> <p>4. What provision for 7-11 year olds will be made at the new provision in Perthcelyn school?</p> <p>5. Will the children have the same yard opportunities and space and open access to outdoors?</p> <p>6. Will the children still have open access to a Sensory room?</p> <p>7. How are the local authority consulting children and young people's views?</p>	<p>quality assurance protocol. No issues have been raised with the LA regarding negative experiences of pupils. Perthcelyn is recognised as a good school by the LA and Central South Consortium.</p> <p>All the required impact assessments have been undertaken, LSC re-alignment will inevitably cause some disruption and uncertainty for parents and pupils for a period of time, although experience from previous LSC realignments has been positive. Access &amp; Inclusion will provide support to eradicate or minimise any potential negative impact. This will involve collaboration between current LSC staff, Access and Inclusion staff, pupils and their families to ensure a person-centred approach is taken to meeting the educational and wellbeing needs of pupils.</p> <p>The new LSC will be established and resourced in line with other LSC provisions within RCT. A broad and balanced curriculum together with specialist additional learning provision will be provided to pupils in line with the requirements of the new Curriculum for Wales and ALN legislation and a consistent approach to LSC provision across the County Borough.</p> <p>There is a quality assurance process in place to ensure there is equity between the different LSCs although this is delivered in different ways in line with the characteristics of the school the class is placed in. Pupils will have the same opportunities to access yard and outdoor learning environments. Perthcelyn has the capacity to accommodate another LSC provision.</p> <p>Yes, there is a sensory room in Perthcelyn Primary School that can be utilised by all LSC pupils as required.</p> <p>7 sessions were held with the relevant School Councils throughout the consultation process. 4 parents also submitted their child's views (included in appendix 1a)</p>
<p>Feedback regarding this proposal has been mixed.</p>	<p>All possible connotations of the proposal were considered prior to publication of the consultation report. The option presented are</p>

<p>Parents of pupils currently attending the LSC in Abercynon wish for the KS2 LSC to remain and to relocate Perthcelyn FP LSC to Abercynon.</p> <p>Parents of pupils currently attending the LSC at Perthcelyn are in support of the proposal to relocate the ASD provision from Abercynon to Perthcelyn to ensure through primary phase provision is available to their children without the need to transition further.</p>	<p>believed by officers to be the most appropriate use of resources to realign LSC provision within RCT.</p>
<p>Number of transitions pupils are required to make.</p>	<p>Concerns have been raised that the proposals will have a negative impact on pupils and may require some pupils to undertake additional transitions to another setting. This has been acknowledged as a potential negative impact but has been mitigated with the very small numbers the proposals will impact (see note above). At the time of the proposed implementation date in September 2024, based on the current intake, a total of 5 year 5 pupils will be potentially affected by the move. To mitigate risks, a person centred approach will be adopted to support the transition. Parents/carers can also opt to keep their children in the same school but within a supported mainstream placement should they wish to do so.</p> <p>However, is important that a longer term view is adopted and a change considered due to the obvious benefits for future generations of learners. In the longer term the proposals will minimise unnecessary transition for pupils with significant needs, provide continuity in their educational placements and ensure that a higher number of specialist LSC provisions provide equity for pupils in LSCs so that they remain in one setting until transition to secondary provision in line with their mainstream peers.</p> <p>Robust transition plans will be put in place for any pupils directly affected by the proposals, which will be planned collaboratively with parents and staff and involve additional support from specialist members of staff from Access and Inclusion.</p>

- **Proposal 3: One** Early Years Assessment & Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School.

Comments/Issue raised	Response to comments/issued raised
Positive responses were received regarding the increased capacity the LSC would provide although responders queried as to if further capacity was needed.	Positive comments are noted and reflect the rationale for the proposed enhancement of provision.
Mixed feedback regarding the location of the proposed new LSC provision. Responses were received in support of the Early Years LSC being established at Abercynon. Feedback was also received regarding the LSC being established at different location.	All possible connotations of the proposals were considered prior to publication of the consultation report. The option presented is believed by officers to be the most appropriate use of resources to realign LSC provision within RCT.
Additional transition of pupils was noted as a concern.	Unfortunately, there appears to have been some confusion with the proposed additional LSC at Abercynon. This is establishing a new LSC so therefore no pupils will be impacted by the proposal.

- **Proposal 4:** Two Primary Phase Welsh medium LSCs at the new Welsh medium primary school at Rhydyfelin for pupils with significant ALN.

Comments/Issue raised	Response to comments/issued raised
General agreement with need for Welsh medium LSC provision.	In general responses recognised the need for additional LCS provisions within RCT, although it was evident that some responses confused the different elements of the proposals
Welsh medium LSCs are welcomed but concerns were raised relating to the LSC not having a specific ALN designation.	<p>Comment is noted.</p> <p>The LA is required by Welsh Government and the ALNET Act 2018 to continuously review both the sufficiency of its Additional Learning Provision for both English and Welsh medium learners and work proactively towards developing a fully bilingual ALN system over time.</p> <p>The proposed LSC will support pupils with significant additional learning needs. There will be agreed Placement Criteria which will be written in consultation with the school. It is recognised that the LSC may need more than 1 classroom area for interventions to help support each learner and sufficient support</p>

	and expertise to support pupils with a range of needs. The needs of the pupils attending the provision will be closely monitored by the LA in collaboration with the school.
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- **Proposal 5:** One ASD LSC provision for pupils in Years 7–11 at the new 3-16 school on the Hawthorn Primary/High School site.

Comments/Issue raised	Response to comments/issued raised
The increase in Key Stage 3/4 provision was seen as positive, however responders felt further LSCs are needed.	In line with the ALN Code 2021, the LA has a statutory duty to review the sufficiency of its provision. Therefore, further reviews will be undertaken to ensure LSC provision within RCT meets the demands of pupils with ALN.

The following general themes were raised across all proposals:

Comments/Issue raised	Response to comments/issued raised
Rationale for change.	<p>This is based on:</p> <p>Data analysis of current and projected pupil need to ensure that the number of LSCs meet identified needs.</p> <p>The opportunity to enhance the number of specialist LSC provisions within mainstream settings to minimise unnecessary transition for pupils between specialist settings in different schools which would provide equity for pupils in need of specialist provision to remain in one school setting as is generally available to mainstream peers.</p> <p>To ensure that a larger number of LSCs and their pupils access specialist provision in school settings that have benefited from significant investment from the 21<sup>st</sup> Century Schools Modernisation Programme.</p>
Proposals are not in the pupil's best interests.	The LA considers that reducing the number of schools transitions is in the pupil's best interests and the enhanced capacity gained from the additional LSCs will ensure more children that require specialist placements can access this in a timely manner. However, we acknowledge there will be some short-term disruption to a small number of pupils during the transition period.

## 8. Estyn’s response to the proposal from Rhondda Cynon Taf regarding LSCs which will take effect from April 2024.

In compliance with the School Standards and Organisation 2018 School Organisation Code the Estyn’s response to the consultation has been provided in full in Appendix 2. Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and have produced a response to the information provided by the proposer and other additional information such as data from Welsh Government and the views of the Regional Consortia which deliver school improvement services to the schools within the proposal. The response reports the following as a summary ***‘Estyn welcomes the local authority’s move to improve provision for pupils with additional learning needs (ALN) and recognises the merit of many of the strategies in the consultation. This includes increasing full-time specialist provision for pupils with significant ALN in Welsh medium schools which was an aspect identified in the recent local government education services inspection. Overall, it is Estyn’s view that the information provided suggests that proposals are likely to improve the provision for learners in the local authority. However, there are a few aspects of the proposals that need strengthening and these are identified in our response.***

Additionally, in accordance with the Code, the areas of the response that require clarification are documented in the table below:

<b>Estyn’s comment</b>
<i>It is unclear whether there are any proposed interim arrangements, which might be necessary for their implementation.</i>
<b>Clarification</b>
Perthcelyn LSC – 3 pupils currently placed in Perthcelyn and due to transition to Abercynon in September 2023 are impacted directly by the proposals. Parents were given the option to either stay at Perthcelyn until the outcome of the consultation is known or move to the LSC at Abercynon in September 2023. All 3 parents have opted to remain at the LSC in Perthcelyn, as a result an additional full time Learning Support Assistant (LSA) will be in place to enhance the staffing capacity of the LSC on an interim basis.
<b>Estyn’s comment</b>
<i>There are five separate proposals in the consultation and the document makes only general statements about disadvantages, such as 'The relocation of the named LSCs could potentially cause some limited disruption to the proposed host schools.' The consultation is not clear enough about potential risks associated with specific proposals or how the local authority will deal with them. The proposal does not set out clearly how the local authority will ensure that the disruption to learners is minimised,</i>

*for example how it will support those pupils currently in any of the settings who are moved to a different provision.*

## **Clarification**

General risks are identified in the Consultation documentation and accompanying impact assessments. Overall, the proposal to open/relocate LSCs would deliver a significant improvement in the quality of educational provision for learners with ALN, having a significant positive impact upon the educational performance of pupils and staff morale. The proposals will ensure that all the LSCs will be compliant with current requirements of planning and building control legislation and will be fully accessible and compliant with the Equality Act 2010 in fully integrated community schools.

In response to the queries raised, specific potential risks to each proposal are detailed:

Enhancing Welsh medium provision (opening of 2 primary phase Welsh medium LSCs at Rhydyfelin):

- Difficulty in the recruitment of Welsh medium specialist staff to work in the LSC. The Council is committed to retaining staff and there is a commitment with the Council's WESP to enhance the specialist Welsh medium workforce to meet the needs of ALN learners bi-lingually.
- If the proposal is not progressed RCT will not comply with the statutory duty to provide support for ALN learners through the medium of Welsh
- Potential disruption for pupils who currently access Welsh medium peripatetic service who meet eligibility criteria for placement at LSC who may wish to attend the designated LSC provisions. To minimise this the LA will involve parents/carers and relevant pupils as active participant in discussions regarding change of placement and transition if the proposals are progressed.

Enhancing ASD KS3/4 (opening a LSC at the new Hawthorn Primary/High school site)

- If the proposal is not progressed there will be insufficient ASD KS3/4 provision to meet the needs of learners

Enhancing Early Years Provision (establishing Early Years Assessment LSC for pupils under statutory school age)

- If the proposal is not progressed there will be insufficient Early Years specialist provision to meet the needs of learners

Relocation of Observation and Assessment LSC at Penrhiwceiber:

- Placement in this LSC is designed to be short term, therefore pupils currently accessing the provision are highly likely to have naturally moved on to their long term educational placement by the implementation date. For those that remain in the LSC at the point of implementation, it is recognised that there may be disruption to the pupils moving to the new location. However, to mitigate this, the current staff will be relocating with the class and pupils to provide continuity of care and support and a robust planned enhanced transition process will be implemented. This will also ensure continuity in educational provision
- If the proposal does not progress pupils will be unable to access an appropriate 21<sup>st</sup> Century environment due to the limitations of the current physical environment



Creation of through ASD primary phase LSC provision (relocation of LSC at Abercynon to Perthcelyn LSC):

- If the proposal does not progress then pupils will continue to have to undertake additional transitions compared to mainstream peers.
- It is recognised that there will be disruption to the pupils moving to the new location. However, to mitigate this the current staff will be relocating with the class and pupils to provide continuity of care and support and a robust planned enhanced transition process will be implemented. This will also ensure continuity in educational provision.
- Alternative arrangements could be considered for individual pupils, including learners remaining in their existing school but in a supported mainstream context – please refer to the conclusion below.
- For pupils who currently attend Abercynon LSC and may need to travel further to Perthcelyn transport will be provided in line with the Learner Travel Policy, it is noted for some pupils the move to the new LSC will be closer to their home address.

Robust transition plans will be put in place for any pupils directly affected by the proposals, which will be planned collaboratively with parents and staff and involve additional support from specialist members of staff from Access and Inclusion.

#### **Estyn's comment**

*The proposer only states that alternatives have been considered, without giving clear information as to what, or why they were discounted.*

#### **Clarification**

In light of the requirements of the ALNET Act maintaining the status quo would mean that RCT would not be meeting its statutory duty to review the sufficiency of its ALN provision. This would result in the Council not meeting the needs of children and young people with ALN, increased pressure on parents/carers, increase in ALN tribunals and increase in cost in placing pupils in specialist out of county provisions.

There is clearly identified need for this provision within RCT and it would be in children and young people's best interest to address this. Some consideration was given to re-directing resources to further enhance the capacity of mainstream schools to meet need in local community schools. However, in light of the severity and complexity of pupils' identified needs this was not considered appropriate as the pupils are deemed to require bespoke specialist provision.

Consideration was given to expanding provision within established LSCs, however this was discounted due to a lack of physical capacity.

Consideration was also given to exploring out of county Welsh medium provision however this would incur a significant increase in cost of placements and transport and would not provide a long time solution to the Council meeting its statutory duty to deliver a bi-lingual system.

Historically as an alternative to a Welsh medium LSC the LA has implemented a virtual Welsh medium LSC whereby pupils are supported by peripatetic specialist staff within their mainstream school. In light of feedback from the Welsh medium sector and the

requirement of ALNET to develop a fully bilingual system it is now considered appropriate to establish primary phase Welsh medium LSCs to provide a more equitable provision in line with English medium provision.

The LA implements an Early Years Enhanced Transition Service for pre statutory school aged pupils entering mainstream nursery provision. Whilst acknowledging the success of this approach in building the capacity of mainstream settings to support pupils with emerging ALN many EY pupils have been identified as requiring higher level of Additional Learning Provision (ALP) that can be provided in mainstream. Since the inception of the Early Years Forum in September 2021 to comply with the new statutory requirements of the ALNET Act for children aged 0-3 years data as at 30<sup>th</sup> January 2023 demonstrates that 294 pupils have been discussed by the Forum. Of these pupils, 40 have been allocated placements within specialist settings and an additional 14 pupils have changed placement from mainstream to specialist provision following a period of assessment.

No alternatives were considered to opening the additional LSC provision at the new Hawthorn site due to the significant demand, severity of needs of pupils and the current capacity issues for specialist ASD placements in the Taf district in comparison to the Rhondda and Cynon districts.

Abercynon was considered the best location to host 2 Early Years LSCs due to its geographical location in relation to other Early Years provisions within the County Borough together with its 21<sup>st</sup> Century environment. This in turn determined that a through ASD provision would also be proposed on the Perthcelyn school site.

#### **Estyn's comment**

*There are no projections or estimates for numbers of future pupils with ALN. For example, the local authority is proposing to create 18 Welsh medium places for pupils with ALN at Rhydyfelin but have not identified the demand for those places. Similarly, two of the schools in the proposal are currently being built, but the proposer has not provided an estimate of projected pupil numbers.*

#### **Clarification**

During the academic year 2022/23, the Welsh Complex Needs Team supported 12 pupils with an age range of Year 2 to Year 11. Pupils currently accessing the Welsh medium virtual class model will be offered a placement within the Welsh medium class, there is evidence of an increase in requests for involvement of Access & Inclusion Staff. 7% of pupils currently accessing English medium LSC provision moved from a Welsh medium school. It is difficult to identify potential demand for a Welsh medium LSC provision as this is a newly established provision, and as such we don't have historical trend data.

Since the inception of the Early Years Forum in September 2021 to comply with the new statutory requirements of the ALNET Act for children aged 0-3 years data as at 30<sup>th</sup> January 2023 demonstrates that 294 pupils have been discussed by the Forum. Of these pupils, 40 have been allocated placements within specialist settings and an additional 14 pupils have changed placement from mainstream to specialist provision

following a period of assessment. It is important to note that this data related to both English and Welsh medium learners.

### **Estyn's comment**

*However, the consultation document does not provide clear enough information on a range of educational aspects of the proposals as identified in the School Organisation Code, such as the impact of the proposals on the quality of teaching, the breadth, balance and appropriateness of the curriculum, and leadership and management.*

### **Clarification**

The LSCs are collaboratively line managed by the host headteacher and central Access & Inclusion staff. Roles and responsibilities of the above are clearly defined in the LA School Learning Support Class Agreement, this includes matters relating to the curriculum and the quality of teaching and learning. There is a robust quality assurance process in place to ensure both the school and LSC staff are well supported and that LSC provision meets all necessary statutory requirements.

### **Standards**

The LSCs will be located in modern flexible learning environments and have access to enhanced outdoor spaces to support the full range of curriculum activities. In addition, increasing the number of LSCs will ensure that a greater number of learners with significant and complex ALN have access to additional learning provision that enhances their progress in relation to their individual targets and starting points. This is monitored through the LSC Quality Assurance process in collaboration with the head teacher.

### **Wellbeing and attitudes to learning**

Access to specialist learning provisions where the individual needs of learners with complex ALN can be met through individualised additional learning provision within 21<sup>st</sup> century environments will have a positive impact upon learner and staff wellbeing. Increasing the specialist provision hosted by mainstream schools will enable learners with ALN to play a full part in the life and work of the school alongside their mainstream peers.

LSC provision designed to provide specialist additional learning provision will ensure increased participation and engagement of learners in their learning and promote resilience. This will be achieved by detailed bespoke planning in line with the identified needs of pupils.

### **Teaching and learning experience**

The LSCs will provide a balanced curriculum at all stages in line with the new Curriculum for Wales – 2022. A 21<sup>st</sup> century learning environment would also provide pupils with greater flexibility and therefore greater choice and opportunities in their learning experience. The LSCs will provide a range of strategies and interventions to meet the needs of individual learners with significant difficulties with access to a wide range of multi-sensory and digital resources to enhance their learning. Bespoke assessment and planning to meet individual needs for example through LA maintained Individual Development Plans (IDPs) will ensure that pupils make progress from individual starting points.

### **Care, support and guidance**

LSCs will have a strong focus upon supporting learners' emotional and social needs and opportunities to work collaboratively with mainstream peers in their host mainstream schools. This will include opportunities to access activities within their local community.

### **Leadership and management**

Leadership and management of LSCs is undertaken collaboratively by the hosting Headteacher and Learner Support Service Co-ordinators in the Access & Inclusion Service to ensure high expectations for learners are achieved. This is supported by a comprehensive quality assurance process and a LA / School LSC agreement that details respective roles and responsibilities of the LA, host schools and LSC staff.

## **8. Assessment of Consultation**

In view of the responses and comments received during the consultation period the proposals have been revisited and the following matters have been reassessed:

- The likely impact of the proposals on the quality and standards of education;
- The likely impact on the community; and
- The likely effect of differing travelling arrangements.

After further consideration, the proposals remain to be the most appropriate and as such minor modifications to Proposal 1 and 2 have been made. The implementation date for both proposals has been amended to September 2024.

## **9. Conclusion**

The proposals to realign LSC provision will ensure that RCT has undertaken its statutory duty under the ALNET Act (2018) to review arrangements for supporting pupils with ALN within the county borough and has identified necessary steps to ensure the sufficiency of its provision for pupils with significant ALN who require specialist placement.

The proposals support the delivery of the RCT WESP and one of the core aims of the ALNET Act by working towards the development of a fully bilingual ALN system within the county borough.

The proposals will ensure greater compliance with the Equality Act 2010 and access to significantly improved premises which have benefited from the 21<sup>st</sup> Century Schools Modernisation Programme and investment.

Following consideration of the responses to the consultation, it is recommended that Members agree to the immediate publication of the attached Consultation Report and agree to give officers approval to publish the appropriate Statutory Notices to progress with Proposals 1 & 2 with amendments as follows:

**Proposal 1 (amended):** To relocate the Observation and Assessment LSC at Penrhiwceiber Primary School to Abercynon Community Primary School taking effect from September 2024. *(Amended from April 2024)*

**Proposal 2 (amended):** To transfer the LSC for pupils in Years 3-6 with Autistic Spectrum Disorder (ASD) at Abercynon Community Primary School to create a through provision in the Primary Phase at Perthcelyn Primary School taking effect from September 2024. *(Amended from April 2024)*

This will reduce the number of pupils affected by the proposals.

It is recommended that Members also agree to the publication of Statutory Notices to progress with Proposals 3, 4 & 5 without modifications as follows:

**Proposal 3:** To establish one Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School taking effect from April 2024.

**Proposal 4:** To establish two Welsh medium primary phase LSCs at Ysgol Awel Taf the new Welsh medium primary school in Rhydyfelin for pupils with significant ALN taking effect from September 2024.

**Proposal 5:** To establish one LSC for pupils in Years 7-11 with ASD at the new 3-16 school on the Hawthorn Primary/High School site, Ysgol Afon Wen taking effect from September 2024.

**Scanned consultation responses (letters/emails), petitions,  
on-line proforma responses**

### Timetable of Consultation Events

School Affected	Group-Pupils/ Staff/Parents	Date
Abercynon Primary Community School	School Council	12th June 2023
	Staff	
	Parents	
Perthcelyn Primary School	School Council	13th June 2023
	Staff	
	Parents	
Penrhiwceiber Primary School	School Council	14th June 2023
	Staff	
	Parents	
New 3-16 school on the Hawthorn Primary/High School site	Staff/Temporary Governing Body	15th June 2023
	Parents	16th June 2023
New Welsh medium School		
Heol-y-Celyn Primary School	School Council	15th June 2023
YGG Pontsion Norton	School Council	22nd June 2023
Hawthorn Primary School	School Council	15th June 2023
Hawthorn High School	School Council	15th June 2023

## Notes of Consultation Events

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	Abercynon Community Primary School		
<b>Venue:</b>	Abercynon Community Primary School		
<b>Date</b>	12/06/2023	<b>Number of School Staff:</b>	23
<b>Number of Pupils</b>	13	<b>Number of Parents:</b>	14
<b>Type of meeting:</b>	School Council, Staff/Governing Body, Parents	<b>Number of Governors:</b>	8
<b>Local Authority Officers in attendance:</b>	Ceri Jones, Lisa Carter, Kate Hill, Iwan Griffiths		
<b>School Council</b>			
<p>Ceri and Lisa provided an overview of the proposals for Abercynon. Below is a summary of the comments made.</p> <ul style="list-style-type: none"> <li>• A pupil raised concerns that the LSC pupils had spent their school life in Abercynon so doesn't know if they would like a new school. They also said that the LSC pupils could have issues getting to school because of the move. Kate explained the effects of transition on ASD pupils and talked about the importance of reducing transitions and that the pupils may have access to transport under the LA Home School Transport Policy.</li> <li>• All members of the school council thought the proposals were a good idea although they had some concerns.</li> <li>• The pupils talked about friendships with pupils from the ASD class and believed that they might not be able to see them again.</li> <li>• A member of the school council thought the ASD pupils might have problems with settling with new friends and that could mean they won't learn anything. Friends can also support the ASD pupils' education.</li> <li>• The school council said that the ASD pupils show other staff/class their work.</li> <li>• The school council said that ASD pupils also take part in school activities to feel included as well as completing work in classrooms.</li> <li>• The pupils raised concerns around "Comfort teachers" potentially not moving with the children. Kate confirmed that the ASD teachers will be moving with the pupils.</li> <li>• One pupil questioned around "split-placement". Kate talked again about reducing transitions and how a split-placement could disrupt and upset ASD pupils.</li> <li>• The school council mentioned that ASD pupils use the outdoor equipment such as tennis courts and the yards with pupils from the other classes.</li> <li>• The school council feel that opening younger classes is good as they can make friends and keep them across their time in the school.</li> <li>• Including mainstream classes with the ASD pupils is seen as positive as the pupils are a benefit to the school.</li> </ul>			



- Hazel pupils are “very funny” and are characters around the school. All the pupils have particular interests.
- The class pupils are included in gymnastics, meaning they could learn alongside other pupils.
- Pupils from Hazel enjoy activities such as acting/dancing.

### **Staff/Governing Body**

Ceri provided an overview of the proposals. Below is a summary of the comments made.

- A question was raised regarding what will happen to the teachers if the proposals are accepted. Ceri confirmed that permanent LSC staff would be relocating alongside pupils to reduce stress and disruption of pupils transition.
- Has an alternative for Penrhiwceiber been considered? Ceri responded that due to the outdoor environment restrictions then the preferred option is to re-locate the provision to 21<sup>st</sup> Century School environment.
- Concerns were raised regarding the transition of older pupils currently in the class from Abercynon as there would be an extra transition and the potential negative impact of this. The staff mentioned that pupils will experience anxiety and stress as a consequence of the proposed move.
- There was dialogue around the new Assessment and Observation Foundation Phase LSC, acknowledging placement in this LSC is short-term and that the pupil would be transitioning further once suitable placement had been identified.
- Why can't the class go from Penrhiwceiber to Perthcelyn? Ceri responded that placing the class in Abercynon would result in an increased geographical catchment area to include lower Rhondda, Cynon and Taf. The classroom identified within Perthcelyn is more suited for Key Stage 2 pupils as opposed to Early Years.
- Concerns were raised regarding the transport of pupils, Ceri advised that transport would be provided in line with the LA's Home to School Transport Policy.
- The staff felt that there is an underestimation of how much the Hazel class pupils are included in the school. They feel the LSC is being treated by the LA as a separate entity. The pupils from the LSC benefit from the inclusive practices of the school. A&I officers reiterated that classes are considered as part of the school and bring benefits to mainstream provision.
- The group highlighted the importance and benefits that community-based activities have on Hazel class pupils. The group felt that the community facilities are better in Abercynon than Perthcelyn. Kate responded that in line with new curriculum for Wales, the curriculum is designed by the school to build on the opportunities available in the school's locality. This will be unique to each setting but there is an expected consistency in the range learning opportunities and the specialist provision available in LSCs.
- The staff believe there will be gaps in staff expertise at Abercynon if the LSC staff move. It was highlighted that LSC staff are centrally employed and can be relocated to any LSC as required.
- The group felt that inclusion opportunities for the proposed Early Years Observation class would be different to those currently in place for Hazel class.
- A member of the governing body asked whether the previous relocations been successful? Ceri confirmed they were.
- The group felt that older students are better placed in larger schools as there is the potential for wider opportunities. Kate explained there is a quality assurance process in place to ensure there is equity between the different LSCs although

this is delivered in different way in line with the characteristics of the school the class is placed in. Ceri responded that there is no evidence of school size being detrimental to pupil's learning. It is dependent on the leadership and management of the school working in partnership with the service.

- A teacher felt that Perthcelyn has less to offer to the pupils. A&I officers explained that the expectation of the provision is the same just different classes have different opportunities and experiences in order to meet the pupil's needs. Ceri further expanded that pupils would be developing on the same pathway but there will be a range of opportunities dependent on what is available in the host school.
- LA officers were questioned why the decision has been made to relocate the classes. It was stated that there is an emphasis on through provision, also looking to modernise the classes by moving to modern and appropriate buildings.
- Questions were raised regarding costs of relocating classes as well as making classes fit for purpose. A&I officers replied that the cost of any developments to the classroom or playground of Perthcelyn Community Primary School would be centrally funded.
- Geographical aspect was addressed in relation to placements.
- Staff questioned if the school would be able to have the classroom back if their numbers increased. They commented the spare classroom is being used for a range of activities. Ceri confirmed that research had been undertaken regarding projected pupil numbers and this had been taken into account when considering this proposal.
- Staff commented that they believed that Perthcelyn has a spare classroom that isn't used. Kate advised that the Perthcelyn classroom would be more suitable for Key Stage 2 provision hence the proposal.
- LA officers were questioned if RCT would be considering opening additional classes in the future. It was confirmed that the service has as statutory duty to review the sufficiency of its ALN provision on a regular basis and further reviews would be undertaken.
- A member of the group asked why the proposed move was April and if the proposed move should be in September as a clean start. Staff felt that the changes will cause upheaval for children, staff – and cause anxiety. Officers reiterated that this was a consultation and that their opinions would be considered when developing the final proposals.
- Feels that the cost to the community is not being considered.
- Concerns were raised regarding the increase in traffic should the proposals go ahead with a second LSC at the school.

#### **Parents**

Ceri provided an overview of the proposals. Below is a summary of the comments made.

- The parents raised that pupil's needs change across a year. Ceri responded that a pupil's IDP would ensure that their needs and suitable provision were clearly identified and reviewed.
- A parent raised their concern that their child had only been attending LSC for a year and would need to be moved again.
- A parent asked why Abercynon is the only class being moved. Ceri explained that LSC provision is continuously reviewed in line with our statutory duty and further reviews will be undertaken in the future. A continuous aim of the service is to reduce the number of transitions. Ceri also explained the proposed changes to the LSCs were phased over several terms to ensure appropriate support could be provided.

- Parents expressed the pupils benefit from having access to the community and facilities – Perthcelyn has not got a community like Abercynon. They also stressed that being part of the community is important as it can lead to improved social, emotional and communication skills.
- A parent raised a concern that home life can be affected by transitions.
- It was stated by the parents that the inclusion of pupils in mainstream benefits Hazel class pupils.
- Parents believe that Abercynon Community Primary School has better facilities and are more accommodating than Perthcelyn Community Primary School. Parents stressed the importance of the community and friendship aspect. Parents stated that Perthcelyn did not have the facilities in the community to facilitate ASD children development – e.g. café, parks, library.
- The parents stated that children who are younger are less likely to be affected by transition. They felt that older children would be adversely affected and the proposal focuses on the younger pupils. “Children who are older are in their own ways and unlikely to adapt”.
- Parents questioned why the school could not accommodate the 2 ASD classes + the Early Years. Officers explained that there were only 2 classes available to host LSCs.
- Parents asked if the LA had considered moving the quieter Early Years Observation and Assessment LSC to a quieter school. Ceri advised the group that the proposal to host the Early Years Assessment and Observation LSC at Abercynon had been made due to the geographical area which would allow pupils from lower Rhondda, Taf and Cynon to access the provision. Additionally, by hosting both an Early Years Assessment and an Observation and Assessment LSCs it would provide additional opportunities and for pupils to access both provisions in the same setting.
- Parents were concerned that historically that the pupils had not been well supported during transition and what support will be put in place now. LA officers advised by parents that pupils will be supported by the LSC staff as they will be moving with the pupils.
- A parent questioned why the changes are being made in April 2024. Officers reiterated that this was a consultation and that their opinions would be considered when developing the final proposals.
- A parent raised concerns that they felt their private information had been shared inappropriately. Officers encouraged the parent to submit any supporting evidence of their concerns.
- A parent stated they felt the proposal had been influenced by a parent from Perthcelyn. Lisa reassured that the proposals were written by LA officers following of their existing provision.
- Parents feel that the process has not been followed and will raise it. Officers encouraged the parent to submit any supporting evidence of their concerns.

Ceri & Lisa described in detail the process of the consultation

- Parents feel that the outdoor facilities are a reason for the children to remain in current provision.
- Parents feel that as the pupils are more established here, they should remain here and the new classes should be placed elsewhere.
- Parents described the massive benefits in Abercynon Community Primary School compared to being placed in other units.
- Parents feel that disruption is not short term but long term.

- Parents raised concerns that they would not be able to access transport to the proposed school as they would be in the catchment area based off transport policy and how this would affect their child. Ceri described the gatekeeping process and reiterated that transport was provided in line with the LA Home to School Transport Policy. Parents feel that there are financial winners and losers – (if you are outside of X miles you cannot claim amount).
- Accessibility issues raised in terms of walking to proposed school due to hills.
- Parents reiterate that there is no benefit to their children from this proposed change.
- Asked if Education Psychology have reviewed these proposed changes – Could a medical professional make a judgment/have input on these changes? Ceri advised the group that no medical professional could impact on the education placement of a pupil.
- Parents feel that LA is taking children with communication and social disorders and moving them out to the “wilderness”.
- Parents felt that the school has everything here, praised staff, facilities and space. Parents can see the benefits of attending the current class in developing their children.
- Parents felt that there was no reason for pupils to move from Abercynon to the proposed school

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	Perthcelyn Primary School		
<b>Venue:</b>	Perthcelyn Primary School		
<b>Date</b>	13/06/2023	<b>Number of School Staff:</b>	4
<b>Number of Pupils:</b>	9	<b>Number of Parents:</b>	6
<b>Type of meeting:</b>	School Council, Staff/Governing Body, Parents	<b>Number of Governors</b>	4
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths		
<b>School Council</b>			
<p>School Council were provided with an overview of the proposals, officers sought their opinions. The following is a summary of their comments:</p> <ul style="list-style-type: none"> <li>• All pupils believed the proposals were a good idea.</li> <li>• School council said that the younger ASD pupils can stay in the same school and maintain friendships as well as make new friends across classes.</li> <li>• It was identified that Dosbath Pinc do not go into junior classes but work alongside other infant age classes. Junior pupils enjoy helping Dosbarth Pinc pupils.</li> <li>• Dosbarth Pinc is integrated within the school and included in activities – Sports Day, Eisteddfod, assembly, lunchtimes mix with other pupils in the yard.</li> <li>• It was highlighted that a former pupil of Dosbarth Pinc transitioned to mainstream.</li> <li>• Pupils in the ASD LSC in Abercynon Primary will be reunited with old friends if they move to Perthcelyn.</li> <li>• Pupils queried where the classroom would be placed. It was clarified that it will be joining the classroom which adjoins the Foundation Phase LSC.</li> <li>• Including another class will help them understand what life is like for pupils with ASD as they get older. Including more ASD pupils will teach others that people are different, will add more tolerance to people who are different in the school.</li> <li>• It was suggested that older ASD pupils could help out with younger ASD pupils.</li> <li>• Pupils in the class could access local resources such as the park, community centre (clubs) and the fields. Perthcelyn has lots of countryside surrounding the school and is located close to the local village. A lot of community activities are available including using the paddling pool/pool committee and the church. ASD Rainbows is situated nearby. Pool has recently undergone huge developmental works and has opened.</li> <li>• It was suggested there might be holiday activities and after school at ASD Rainbows</li> <li>• Pupils in the class will also be able join in with school trips such as theme parks, Techniquet, folly farm.</li> <li>• The children look forward to having a new class, they had no concerns.</li> <li>• Questioned who would be in the class. Kate mentioned the ASD class will transition alongside the staff.</li> </ul>			

### **Staff/Governing Body**

Lisa provided an overview of the consultation process.

- A question was raised regarding surveys and feedback, how does this affect the proposals? The answer was provided that Cabinet will review all documentation received during the consultation process. The Access & Inclusion Service have a duty to provide a response to all comments and include them in the consultation response document.
- The general consensus was that there was fear that there would be an imbalance of influence of the petitions due to the different sizes of the impacted communities as Abercynon has a larger community and school population than Perthcelyn. Fears that all changes could be overturned if enough noise is made. Concerns were raised it would set a precedent if proposals can be overturned with no rationale, just a large number of names on a petition.

Kate provided an overview of the consultation proposals.

- Consensus is agreement with the proposals.
- A&I staff encouraged attendees to utilise the survey and provide further correspondence to express their views.
- A&I staff emphasized that anybody who wants to provide feedback can.
- It was identified that considerations need to be made for pupils mentioned in parent meeting who may need to transition to Abercynon then back to Perthcelyn if the proposal is accepted.
- The staff were of the viewpoint that children from a younger age are less likely to deal with transition, one attendee believed that change is easier when older.
- All members believe that the proposed changes are all positive for the younger pupils.
- Staff felt parents prefer to attend the school in general due to the facilities.
- Kate explained the location rationale and adapted classrooms as to part of the rationale for the accessibility aspect of the proposals.
- School is reputable for being inclusive and staff work collectively to incorporate inclusion across the school.
- Some pupils from Abercynon are former pupils so will have experienced the school beforehand.
- Discussion around the importance of variety of provision to meet the demand of different needs across the LA.

### **Parents**

Lisa provided an overview of the consultation process and Kate provided an overview of the consultation proposals.

- Concerns were raised that children are likely to suffer due to transition. Parents felt pupils would be moved from Perthcelyn to Abercynon and then back to Perthcelyn. Parent cited long-term disruption to education and personal development. Could the pupils due to transition in September stay at Perthcelyn if the class is to be moved. Parents discussed the preparation and the negative effect of transitioning. Kate answered that the individual pupil needs would be considered and discussed with parents in preparation for year 3.
- Parents stated that they feel their children are thriving emotionally, academically, and socially and would not want any disruption to impact on progress.
- Parents discussed their children and feel that transitioning will have negative impact on child's learning. Fear of regression and long-term effects of transitioning.

- Parents have raised funding personally to develop the facilities at Perthcelyn and want their children to continue to benefit from it.

Lisa expanded on the consultation process as questions were asked regarding whether the decision has been made already.

- A parent asked about the geographical location of the Early Years LSC. Kate provided explanation as to why the classes have been selected from a geographical perspective as well as a fully accessible environment in a 21<sup>st</sup> century school.
- A parent raised concerns that the transition between foundation phase and Key Stage 2 had a detrimental effect on the pupil's access to education and therefore supported the case for through provision.
- Parents stated they accepted the place in the LSC as the school is smaller and quieter. The parents believe the pupils have thrived in the current setting and were concerned that moving to a much larger school would have a negative impact.
- A parent questioned if Estyn reports would be taken into consideration. Access & Inclusion staff confirmed that we are required to seek feedback from Estyn and this will be detailed in the consultation response report.
- The parent was pleased with the recognition by Estyn of the work undertaken in Perthcelyn in relation to pupil wellbeing. The parent felt this was the most important factor for her.
- Parents talked about how different community facilities can benefit different children. Kate explained how the new curriculum for Wales should be adapted to build on local available resource. There is an expectation that a commensurate provision is made across all learning support classes of the same designation however this is adapted and developed to capitalise on the resources of the local community.
- Parents raised concerns around public response to the proposed changes and they felt they were experiencing hostility from those objecting to the move from Abercynon. Parents felt that Abercynon are shouting the loudest and causing large disruption which could impact the outcome of the consultation. Parents felt that people could sign petition with no link or understanding of the proposals and influence the decision.

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	Penrhiwceiber Primary School		
<b>Venue:</b>	Penrhiwceiber Primary School		
<b>Date</b>	14/06/2023	<b>Number of School Staff:</b>	4
<b>Number of Pupils:</b>	6	<b>Number of Parents:</b>	0
<b>Type of meeting:</b>	School Council, Staff/Governing Body, Parents	<b>Number of Governors</b>	3
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths		
<b>School Council</b>			
<p>Lisa provided overview of the proposal effecting Penrhiwceiber. The following is the summary of the comments made.</p> <ul style="list-style-type: none"> <li>• Discussions were held regarding the current outdoor play area and classroom size for the Penrhiwceiber LSC pupils. A pupil thought the outdoor area is too small and that sometimes Dosbarth Chestnut goes on the main yard. A member of the school council thought it would be better for Dosbarth Chestnut to have more space to learn outside.</li> <li>• One pupil believes the pupils should move due to larger space to move around for play. They spoke about a particular pupil who needs additional space.</li> <li>• The school council felt that it would be a big change for Dosbarth Chestnut.</li> <li>• The school council felt that the children may initially find it tricky to settle as they are not used to it.</li> <li>• It was identified that Dosbarth Chestnut pupils do not stay for long but when pupils are in the younger years, they play with Dosbarth Chestnut at break and lunch time.</li> <li>• The school council felt it would be emotional for Dosbarth Chestnut to leave. Lisa confirmed that the current teacher and permanent assistants would move alongside the class to help settle them.</li> <li>• A member said Dosbarth Chestnut could make more friends in a different school.</li> <li>• A suggestion was made by the school council that they could visit the children.</li> <li>• Discussions were held around how the school could use the space freed up from moving the class. Ideas included a reading corner, a homework station or making “the burrow” bigger.</li> <li>• One member asked if we could make the classroom bigger or rearrange other classrooms. The headteacher explained that there would not be enough space for all the current classes and that making the classroom bigger would be difficult due to the slope and the different height of ground outside of the classroom.</li> <li>• All members of the council said they would feel sad if Dosbarth Chestnut moved although they believe the proposal is a good idea.</li> </ul>			
<b>Staff/Governing Body</b>			



Lisa provided an overview of the process; Kate provided an overview of the proposals. The following is a summary of the comments made.

- A Staff member mentioned their concerns regarding school accessibility in the morning. Currently, there are severe disruption to pupils trying to access the school on foot due to taxi's dropping off the LSC pupils and the parent's cars. Alternatives have been previously explored although it is not possible to adapt the drop-off area due to the geography of the site. Particularly, the steep, narrow streets surrounding the school.
- Accessibility issues were raised as current LSC pupils need guidance up and down multiple sets of steps. A&I staff informed the school's staff that more children are being identified with mobility issues. An aim of the proposal is address this by placing the LSC in a 21<sup>st</sup> century school which is accessible by design.
- Staff said that it will be sad for the class to leave although there is a need for a space for outdoor learning and want what is best for the children.
- Staff pointed out to the credit of the school's pupils that they have been very inclusive to Dosbarth Chestnut.
- Following the school council, on returning to class, the pupils fed back to staff that they will feel sad but recognise the children's needs need to be met.
- Staff raised questions regarding whether the LSC pupils will adapt and if a larger volume of pupils will affect the LSC pupils. The staff report that some pupils currently do not go out if there is too much noise and so a small school is seen as a benefit.
- A member identified the financial impact as the school is centrally funded and the school will lose a percentage of funding which helps cover site costs. This led to a member questioning if developments can be made on the site. Another member addressed this and provided rationale as to why changes could not be made using the same reasons as detailed above.
- A&I staff were questioned as to what would happen to staff working in the LSC. It was highlighted that permanent staff in that class will move alongside the pupils. Staff felt that 3 members are needed to manage the class and talked regarding the Enhanced Capacity Funding currently being received.
- A member believed that it's a struggle to cater for the needs of 7 LSC pupils in their current classroom due to the restriction in size and lack of outdoor space.
- A member identified additional staffing would be needed for larger Early Years classes. A&I officers clarified that pupil numbers would stay the same and the new proposed class would have its own allocated staff. A member questioned if there may be job opportunities for non-permanent staff as a new class is opened. A&I officers confirmed that the new class was increased capacity and would require new staff.
- A member talked about how valuable non-permanent the staff member is as they understand the children's needs.
- The staff felt that the changing room developments made LSC classroom smaller in Penrhawceiber Community Primary School.
- The same staff member identified that the furniture is not suitable for the current pupil's needs.
- The consensus was that the move is difficult for staff and could be for children in transition although the children's needs are the priority.
- It was asked if staff could visit Abercynon to check the facilities. They also asked if the secure outdoor area needs to be split if multiple classes have access. A&I

staff informed the staff that they could visit the provision with prior arrangement with A&I.

### Learning Support Class Review Consultation Events 2023

<b>School Name:</b>	Heol y Celyn Primary School
<b>Venue:</b>	Heol y Celyn Primary School
<b>Date</b>	15/06/2023
<b>Number of Pupils</b>	6
<b>Type of meeting:</b>	School Council, Staff/Governing Body, Parents
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths

#### School Council

Lisa gave an overview of the proposals.

- School council believe that the proposals were a good idea.
- When asked for opinions on the proposal, one pupil said that having the classes would mean there are new and more resources for the LSC pupils and themselves.
- The school council also believe adding new classes will help them and other pupils understand different additional learning needs and how they can help.
- The school council looked forward to the opening of new classes, no concerns were raised.

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	Hawthorn Primary School		
<b>Venue:</b>	Hawthorn Primary School		
<b>Date</b>	15/06/2023	<b>Number of School Council:</b>	6
<b>Type of meeting:</b>	School Council		
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths		
<b>School Council</b>			
<p>Kate provided an overview of the proposals, the following is a summary of the comments they made:</p> <ul style="list-style-type: none"> <li>• All the pupils thought it was a good idea, they felt the new class would help pupils learn and support those that need it.</li> <li>• The group were asked what they knew about Autism, one pupil told us about a club that she attends where her friend has autism and how they do things differently to include her.</li> <li>• The pupils felt it would help themselves understand older pupils with Autism and they could help the pupils in the class learn.</li> <li>• Kate was asked where would the class be? Kate explained it will have its own class within the school but that the pupils will come into their classes, and may join them during playtimes and lunch breaks</li> <li>• A pupil asked Kate what do you do to help the pupils? Kate explained that there are teachers and learning support assistants that help the pupils with their learning, providing extra support to those pupils that struggle with change for example, they have lessons on how to learn to read emotions. The smaller classes gives pupils with ASD a safe place to learn, as some prefer small classes rather than in a mainstream class but others learn better in a larger class</li> <li>• Will it be in the new school? Yes it will open once the new school opens</li> </ul>			

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	YGG Pontsion Norton		
<b>Venue:</b>	YGG Pontsion Norton		
<b>Date</b>	22/06/2023	<b>Number of Pupils:</b>	7
<b>Type of meeting:</b>	School Council		
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Iwan Griffiths, Ailsa Reynolds		
<b>School Council</b>			
<p>Ailsa and Lisa provided an overview of the proposals. Below is a summary of the school council's comments.</p> <ul style="list-style-type: none"> <li>• A member of the school council asked whether it's been decided on how many pupils will be in the new classes? Lisa provided an explanation around the number of teachers and LSA's in the class. A member of the school council asked what kind of needs the class will have. Ailsa informed the student council that the class is for children with significant learning needs in the medium of Welsh and that pupils with different needs can access the class. Ailsa described that the pupils would come from across RCT and will be transported by taxis.</li> <li>• The student council have no issues with the new classes proposed and feel the changes are a good idea. One pupil discussed how a smaller class would be good for pupils that struggle in larger classes.</li> <li>• A member of the school council asked would the other boys and girls be able to play with the LSC pupils. Lisa advised that the school will encourage inclusion in all areas including, playtime, celebrations, assemblies, school trips and shared class lessons.</li> <li>• A member of the school council asked if the LSC pupils will do the same work but slower than the mainstream classes. Ailsa advised that it's dependent on the pupil's needs of the class. The LSC pupils will follow the same topics in school but their learning will incorporate what works best for the LSC pupils based off their needs.</li> <li>• A member of the school council asked if there are too many pupils in the new LSC class, what will happen? Lisa discussed class size as mentioned earlier by Ailsa. Lisa also said that if there are too many pupils, Access &amp; Inclusion would look to open a new LSC in a different school.</li> </ul>			

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	Hawthorn High School		
<b>Venue:</b>	Hawthorn High School		
<b>Date</b>	15/06/2023	<b>Number of School Council:</b>	6
<b>Type of meeting:</b>	School Council		
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths		
<b>School Council</b>			
<p>Iwan provided an overview of the proposal in relation to LSC provision within the New Hawthorn School, the following is a summary of the comments the council raised:</p> <ul style="list-style-type: none"> <li>• Officers were asked why was it designated KS3/4 and not primary as well? Kate explained that we have sufficient primary provision at the moment, pupils thought we should consider opening provision for younger pupils.</li> <li>• Good idea to provide help to pupils who would be struggling, a pupil believes the mainstream pupils of the schools will be accepting of pupils with autism. The pupil spoke fondly of a pupil with additional learning needs and how everyone had included them.</li> <li>• The pupils felt the class would allow specific support to be provided in a dedicated environment and would be beneficial all round to both pupils and staff.</li> <li>• They are used to pupils coming into their class and then leaving to go back to their base from the speech and language LSC.</li> <li>• A pupil explained that the Hive is used to support pupils at the moment, those that need to chill out or for help with English, Maths, or if they are stressed, the staff do activities that can help pupils. Pupils thought that the Hive could help pupils in the LSC and questioned if the Hive could be expanded for the LSC pupils.</li> <li>• A pupil questioned if the LSC would be accessible for pupils not diagnosed with autism? Kate explained due to the wait list for a diagnosis following Covid, we look at the needs of the pupils and the support the individual requires to learn, equally some pupils with a diagnosis can access mainstream provision.</li> <li>• A pupil questioned if the pupils would have extra transition days. Officers responded that yes additional transition opportunities or days would be planned to meet individual pupil needs.</li> <li>• One pupil had a LSC in their primary school so they are used to having a class.</li> <li>• The group discussed the benefits of having ASD specialist within the school environment and how this would help all staff.</li> </ul>			

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	New Hawthorn School & New Rhydyfelin School		
<b>Venue:</b>	Teams		
<b>Date</b>	15/06/2023	<b>Number of Participants:</b>	2 – Members of Staff from Hawthorn High and 1 Councillor
<b>Type of meeting:</b>	Temporary Governing Bodies of the new Hawthorn 3-16 School and New Welsh Medium School		
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths		
<b>Temp Gov Body</b>			
<p>Lisa provided overview of the consultation process. Kate provided overview of the proposals. The following is a summary of the comments made.</p> <ul style="list-style-type: none"> <li>• A member asked if the proposals would affect the provision of the current Speech and Language LSC in Hawthorn High. A&amp;I staff responded by clarifying that the 2 LSCs are independent and so the proposal will increase provision and staffing.</li> <li>• A member of staff questioned how the class would be organised within the school. Kate referred to practise in the existing ASD LSCs where pupils access approximately 60% of their provision in mainstream. Integration into mainstream will be encouraged alongside specialist interventions focused on social communication skills.</li> <li>• It was asked how many new staff will be employed for the new LSC on the Hawthorn primary/high site. Kate informed the member that a LSC teacher and LSC assistants will be centrally funded and provided to schools.</li> <li>• It was asked if an IDP could contain 1-to-1 support. Kate discussed in detail the different support available for pupils with an IDP and confirmed that 1-to-1 is not allocated in an IDP.</li> <li>• Discussions were held around the building design of the new 3-16 school in Hawthorn. Lisa informed the members that the proposed LSC classroom had been identified when plans were drawn up, therefore the school does have capacity for this proposal. A member talked about the importance of making sure the school is fit for purpose. A&amp;I staff discussed how provision discussions were held during the planning stage and so factors such as noise level and space were considered.</li> <li>• A member questioned whether LSC pupils will be required to sit exams. Kate clarified that students will sit exams.</li> <li>• A member questioned how the LA will support the school in setting up the class. A&amp;I staff informed the member that once the consultation was complete and</li> </ul>			

agreed on, the SEN Coordinator will work to develop the provision alongside the school. Resources, provision and training opportunities will be made available.

- A member asked if the LSC posts are identified in the staffing structure of the school. Lisa clarified that the LSC posts are not included in the structure of the school. LSC staff are centrally funded and appointed in collaboration with the school.
- A member identified that the emphasis of the consultation is to reduce transition and highlighted that the new 3-16 school in Hawthorn is an excellent example of where through provision could be placed. A&I staff fed back that currently there is sufficient primary ASD provision however, there is insufficient secondary provision. A&I officers noted the suggestion. It was accepted by the member that not all changes can be made at the same time and suggested that this could be looked at in the future.
- A member felt that the current proposals were focused on reducing transitions of younger pupils and not older pupils. A&I staff talked about Porth Community School that currently hosts LSCs at all age group levels and that in the future this approach may be incorporated into more schools.
- A member praised the concept of converting the Council Offices in the Pavilions to a special school to increase provision.
- The structure of the consultation response proforma was queried. Lisa clarified this had been rectified on the online proforma which breaks down each proposal.
- Kate stated that the proposals are still in consultation phase and feedback is valued. Kate encouraged contribution from members.
- A member was unsure why the temporary governing body and pupils were met with of the affected schools in the catchment area although not the existing staff and school governors. Member would have preferred school governors to have given formal input to the consultation. Lisa encouraged the member to share the consultation response proforma with the school governors.
- It was asked where would the class be situated on campus? At this moment in time, Lisa had only seen the classroom location on a development map. The classroom has been allocated by 21<sup>st</sup> century in the new building. It is unclear if the proposed LSC will be in the same area of the school as the Hawthorn Speech and Language LSC.

<b>Learning Support Class Review Consultation Events 2023</b>			
<b>School Name:</b>	New Hawthorn School & New Rhydyfelin School		
<b>Venue:</b>	Hawthorn Leisure Centre		
<b>Date</b>	16/06/2023	<b>Number of Participants:</b>	0
<b>Type of meeting:</b>	Parents of pupils that could attend the new Hawthorn 3-16 School and New Welsh Medium School		
<b>Local Authority Officers in attendance:</b>	Lisa Carter, Kate Hill, Iwan Griffiths, Ailsa Reynolds		
<b>Temp Gov Body</b>			
No parents attended.			



### Estyn Report

Proposal to reconfigure mainstream learning support class provision within Rhondda Cynon Taf.

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals. Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

The proposal is to:

- To relocate the Observation and Assessment LSC at Penrhiwceiber Primary School to Abercynon Community Primary School with effect from April 2024.
- To transfer the LSC for pupils in Years 3- 6 with Autistic Spectrum Disorder (ASD) at Abercynon Community Primary School to create a through Primary Phase provision at Perthcelyn Primary School taking effect from April 2024.
- To establish one Early Years Assessment and Intervention LSC for pupils under statutory school age with significant presenting needs at Abercynon Primary School. The proposal will take effect from April 2024.
- To establish two Primary Phase Welsh medium LSCs at the new Welsh medium primary school in Rhydyfelin for pupils with significant ALN. The proposal will take effect from September 2024.
- To establish one LSC for pupils in Years 7-11 with ASD at the new 3-16 school on the Hawthorn Primary/High School site taking effect from September 2024.

#### Summary/ Conclusion

Estyn welcomes the local authority's move to improve provision for pupils with additional learning needs (ALN) and recognises the merit of many of the strategies in the consultation. This includes increasing full-time specialist provision for pupils with significant ALN in Welsh medium schools which was an aspect identified in the recent local government education services inspection. Overall, it is Estyn's view that the information provided suggests that proposals are likely to improve

the provision for learners in the local authority. However, there are a few aspects of the proposals that need strengthening and these are identified in our response.

## Description and benefits

The local authority has given a clear rationale for the overall proposal. It aims to realign ALN provision to meet the needs of pupils, to establish additional Welsh medium learning support classes (LSCs) to enable pupils with significant ALN to access full-time specialist Welsh medium provision, to reduce the number of transitions between placements for vulnerable pupils and to meet the demand for early intervention.

The consultation document contains a projected timetable for statutory procedures and clear end dates for each of the five proposals, for example identifying when new provision will open. It is unclear whether there are any proposed interim arrangements, which might be necessary for their implementation.

The local authority has identified well the expected benefits of the proposal but has not set out clearly potential disadvantages. It recognises advantages fairly, such as improving the range of facilities and learning resources available to pupils. However, there are five separate proposals in the consultation and the document makes only general statements about disadvantages, such as 'The relocation of the named LSCs could potentially cause some limited disruption to the proposed host schools.' The consultation is not clear enough about potential risks associated with specific proposals or how the local authority will deal with them. The proposal does not set out clearly how the local authority will ensure that the disruption to learners is minimised, for example how it will support those pupils currently in any of the settings who are moved to a different provision.

The proposal document identifies appropriately that doing nothing would mean that the local authority would not be meeting its statutory duty and that there is an identified need for this provision. However, the proposer only states that alternatives have been considered, without giving clear information as to what, or why they were discounted.

The local authority has considered adequately the impact of the changes on learner travel arrangements and on accessibility of provision. The proposal identifies that transportation would be provided in line with the council's policy and placement made in the nearest and most appropriate specialist setting. It notes that if pupils are placed within a LSC they may be required to travel out of catchment, although they will endeavour to place pupils in the nearest appropriate LSC to their home address.

The proposer identifies the number of pupils currently at each school and an estimate of future numbers. However, there are no projections or estimates for numbers of future pupils with ALN. For example, the local authority is

proposing to create 18 Welsh medium places for pupils with ALN at Rhydyfelin but have not identified the demand for those places. Similarly, two of the schools in the proposal are currently being built, but the proposer has not provided an estimate of projected pupil numbers.

The proposal takes good account of the impact of the proposals on Welsh medium provision within the local authority and the extent to which the proposal would support the targets in the local authority's Welsh in Education Strategic Plan (WESP).

## Educational aspects of the proposal

The local authority identifies fairly a range of benefits of the proposal and the potential impact on vulnerable pupils. The proposer identifies that

- The relocation of the LSC provision to Abercynon Primary School should provide a more coordinated approach and improved continuum of ASD provision for pupils in the Cynon Valley.
- Relocating the LSC currently hosted at Penrhiwceiber Primary School will ensure the pupils have access to suitable outdoor play areas which is fundamental to Early Years learning.
- The proposals to create an enhanced through provision at Perthcelyn should ensure that pupils are not required to undertake any additional transitions and will allow those pupils who meet the criteria for the LSC to remain at the provision until the end of Year 6.
- The creation of Welsh language ALN provision at Rhydyfelin will ensure that the local authority addressed the current gap in primary-age Welsh medium LSC provision.

However, the consultation document does not provide clear enough information on a range of educational aspects of the proposals as identified in the School Organisation Code, such as the impact of the proposals on the quality of teaching, the breadth, balance and appropriateness of the curriculum, and leadership and management.

The proposal provides information from the most recent Estyn reports for each school likely to be affected.