

DIRECTORATE OF LEARNING AND SKILLS CONSULTATION DOCUMENT

ON THE PROPOSAL TO:

- TRANSFER SPECIALIST RESOURCE BASE AT LLANDOUGH PRIMARY SCHOOL TO YSGOL Y DDRAIG FROM JANUARY 2023.



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1. BACKGROUND

This report presents the feedback received during the consultation, undertaken from 13th July 2022 to 22nd September 2022, in response to the Council's proposal to permanently relocate the specialist resource base from Llandough Primary School to Ysgol Y Ddraig from January 2023. The statutory consultation was held to seek comments from relevant parties on a regulated alteration as defined in "the Code" which seeks to transfer of any school to a new site.

1.1. PROPOSAL: TO RELOCATE THE SPECIALIST RESOURCE BASE AT LLANDOUGH PRIMARY SCHOOL

- Relocate the Specialist Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig from January 2023.

To implement the proposal specialist educational provision for pupils aged 4-11 year with Speech, Language and Communication Needs would be relocated from Llandough Primary School to Ysgol Y Ddraig. Ysgol Y Ddraig is an English medium community school located in Llantwit Major which currently caters for 3–11-year-olds. An area of the building has been allocated for the SRB. It is proposed that the SRB would follow the same model as described above, maintaining its focus on pupils with Speech, Language and Communication Needs.

This report outlines the consultation process, provides an overview of responses to the consultation, and offers further details of the key issues and favourable comments raised by stakeholders.

2. OUTLINE OF THE CONSULTATION PROCESS

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and in accordance with the School Organisation Code 2018. The consultation processes gave prescribed consultees the opportunity to learn about the proposal and for the Governing Body to hear the views of all those with an interest so that they can be considered before a decision is made to extend the age range at the school.

2.1. PUBLICATION OF THE CONSULTATION

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and published on the Vale of Glamorgan Council website on the 13th July 2022. Hard copies of the consultation document were available upon request.

The publication of a consultation document is central to the consultation process for school reorganisation and is prescribed by Welsh Government in the School Organisation Code 2018. The consultation document outlined the proposals being considered, the rationale for the proposals and the details of the consultation processes. The consultation document also incorporated an individual response form. Consultees were advised of the availability of an online version to complete.

2.2. CONSULTATION STAKEHOLDER ENGAGEMENT

Engagement for the consultation on the proposal was undertaken with prescribed consultees as contained within the School Organisation Code 2018.

The following groups were consulted:

Table 1: List of groups consulted as part of the consultation process

Staff (teaching and non-teaching) at Ysgol Y Ddraig and Llandough Primary School	Governing Body of Llandough Primary School
Parents/Carers and Guardians of children at Ysgol Y Ddraig and Llandough Primary School	Governing Body of Ysgol Y Ddraig
Town and Community Councils	Diocesan Directors of Education
Vale of Glamorgan Children and Young People's Programme Board	Vale of Glamorgan Early Years Development Partnership (EYDCP)
Assembly Members (AM's) / Members of Parliament (MP's) / Regional Assembly Members	Local Councillors
Rhieni dros Addysg Gymraeg (RHAG)	Welsh Language Commissioner
Estyn	Primary and Secondary schools in the Vale of Glamorgan

Welsh Government Ministers	Central South Consortium Joint Education Service
Local Police and Crime Commissioner	Trade Unions
Council's Transportation Department	Directors of Education – All Neighbouring Authorities

Consultees were invited to complete a formal consultation response form which could be completed in hard copy or online via the Council's website at:

[Consultation on SRB re-location to Ysgol Y Ddraig \(valeofglamorgan.gov.uk\)](http://valeofglamorgan.gov.uk)

2.3. LATE REPRESENTATIONS

The closing date for the consultation was the 22nd September 2022. No late representations were received.

2.4. CONSULTATION MEETINGS

Meetings were proposed to be held with the staff and governors at both Schools during the consultation period. These could be held in person or virtually. However, there was no take-up for the meetings from staff or governors. Contact details for staff and governors to contact the Council directly regarding the consultation were shared with staff and governors to address any queries or concerns separately.

2.5. CONSULTATION QUESTIONS

Consultees were asked for their opinion on the key question for the proposal:

1) Do you support the proposal to relocate specialist education by establishing a specialist resource base at Ysgol Y Ddraig from January 2023?

Consultees were able to respond to the question with Yes or No. Consultees were also offered the opportunity to comment further:

If you would like to suggest any changes or alternatives to the proposals, please detail these below.

Any other comments?

3. CONSULTATION RESPONSES

The consultation responses received in writing between 13th July 2022 and 22nd September 2022 are outlined below.

3.1. SUMMARY OF RESPONSES

3 individual responses were received by the consultation closing date. The breakdown of responses to each proposal are detailed in the tables and charts below.

It has been noted that not all consultees provided a response to each of the questions and that some forms were not fully completed. In these cases, we have accepted the responses to the questions that they have chosen to answer.

Respondents were asked to indicate their role in relation to the proposal, respondents were able to tick more than one option.

Respondents were also asked to indicate the school they are connected to (if any) in relation to the proposal.

Table 2: Responses in detail

Annex	Description
Annex A	A summary of key issues raised by statutory consultees and the Council's response to those issues can be found at Annex A.
Annex B	A summary of the comments received in favour of the proposal can be found at Annex B.
Annex C	The frequently asked questions (FAQs) document has been updated to include the key questions raised during the engagement sessions (Annex C).
Annex D	Estyn formally responded to the consultation. Their response can be found at Annex D.

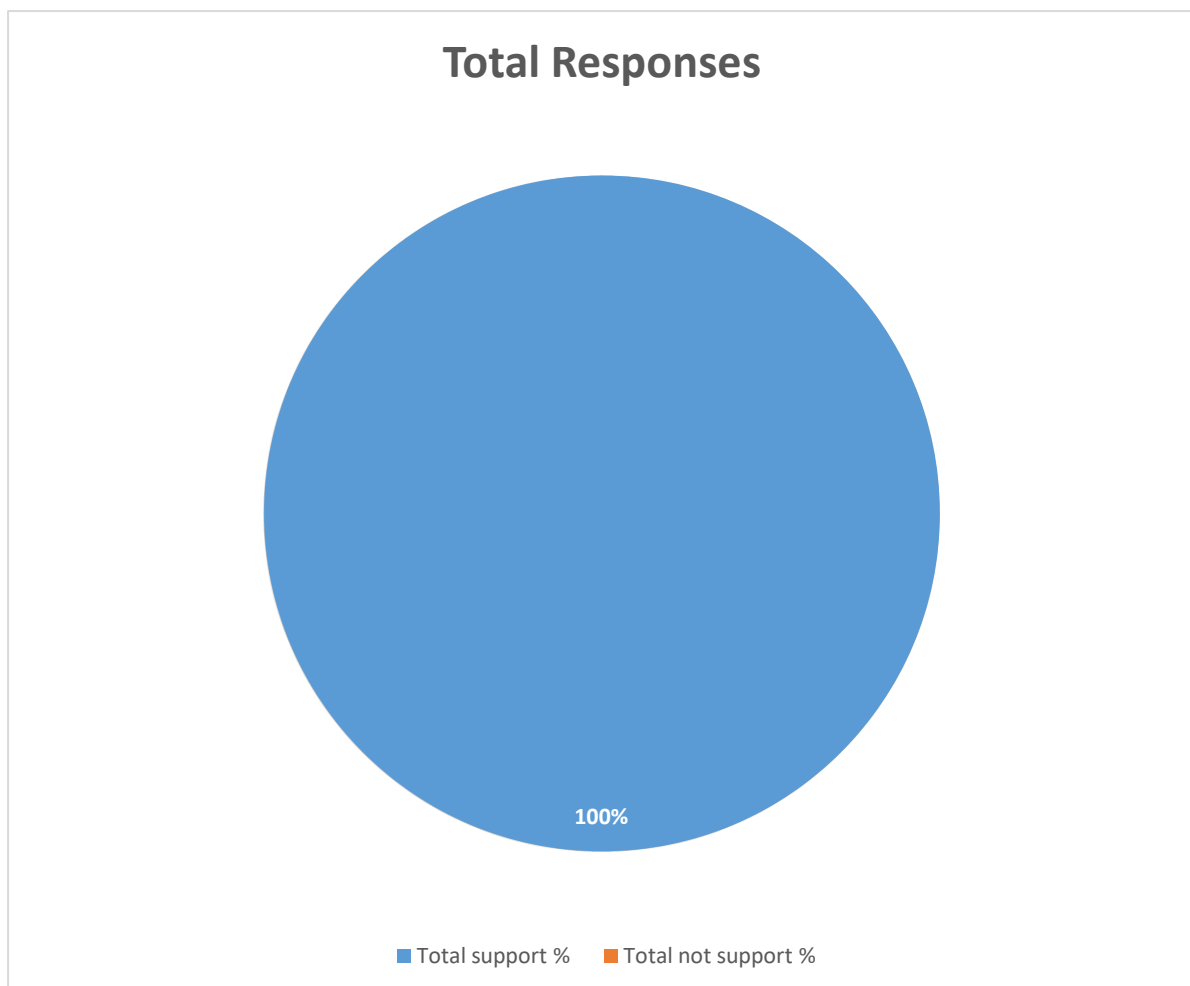
3.2. RESPONSES TO THE PROPOSAL: TO RELOCATE THE SRB AT LLANDOUGH PRIMARY SCHOOL TO YSGOL Y DDRAIG

As Table 3 and Chart 1 below show, most responses (25%) were **not** in favour of the Proposal.

Table 3: Breakdown of consultation responses

Total (individual) responses:	Total support		Total not support	
	No.	%	No.	%
4	1	100%	0	0%

Chart 1: Split of responses supporting or not supporting the Proposal of the consultation

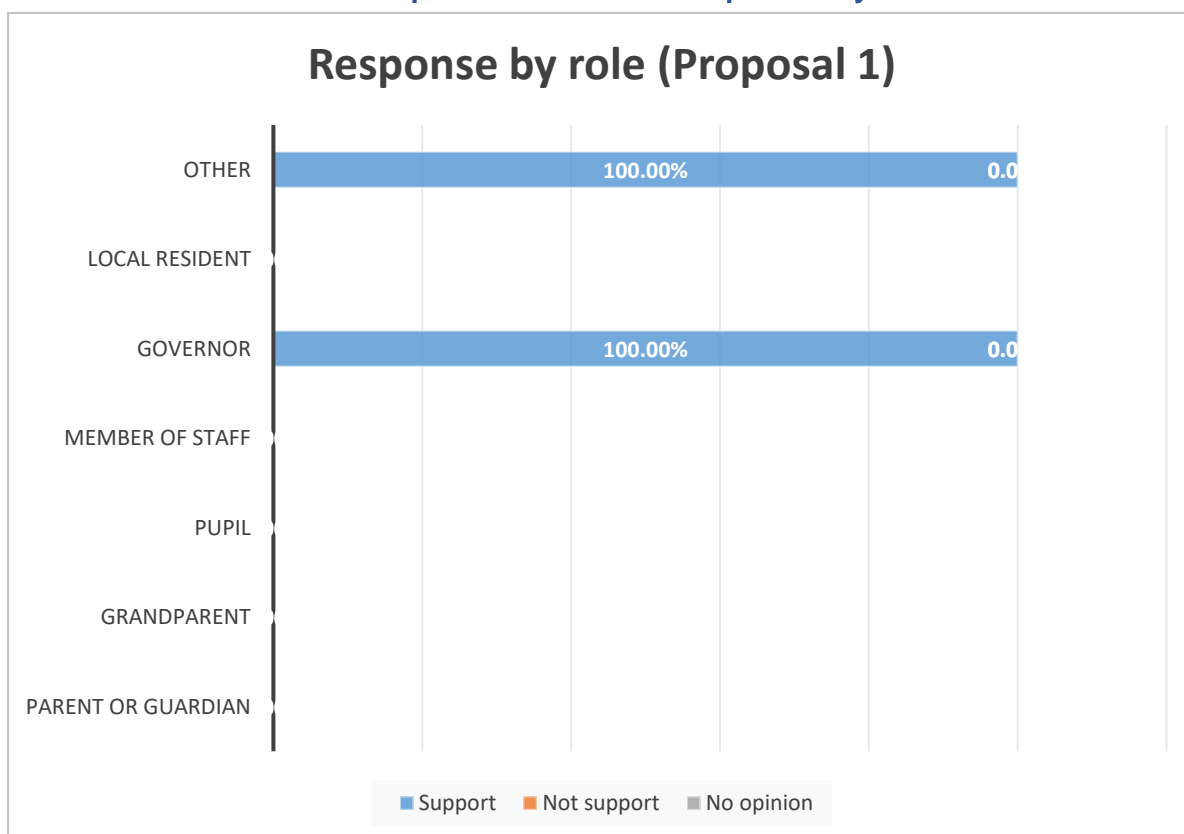


As Table 4 and Chart 2 below show the majority of the largest group of respondents (Other) were **for** the Proposal. 1 respondent identified as a Governor and also **for** the proposal.

Table 4: Breakdown of consultation responses by role

Response by role (A):	Support	Not support	Total
Parent or guardian	0	0	0
Grandparent	0	0	0
Pupil	0	0	0
Member of staff	0	0	0
Governor	1	0	1
Local Resident	0	0	0
Other	3	0	3

Chart 2: Split of consultation responses by role



Regarding responses affiliated with schools, 1 respondent identified as being affiliated with Llandough Primary School and supported the proposal. The remaining respondents did not identify any affiliation with the school the proposal relates to or any other school.

4. CONCLUSION

Following consideration of the responses received throughout the consultation period, the Council has revisited the proposal to determine the likely impact on quality and standards in education, the local community and travel arrangements.

4.1. QUALITY AND STANDARDS IN EDUCATION

Both schools have recently been subject to an Estyn Inspection. During the consultation, Ysgol Y Ddraig's inspection report had not been published. However, the report has now been published. Llandough Primary's inspection report was published prior to the consultation in March 2022.

The Llandough Primary School Inspection Report identified pupils attending the school make strong progress and achieve well. In particular digital skills are developed well. However, it was noted that pupils' skills in speaking Welsh, and their pride in living in Wales or being Welsh, are less well developed. Regarding the SRB at the school it was noted 'pupils from mainstream classes have benefited from specialist support in the learning resource bases to improve their communication skills.' The Report recommended the following improvements:

- R1 Strengthen the provision for pupils to learn Welsh, and about the culture and heritage of Wales,
- R2 Devise a cyclical system to ensure that the governing body monitors, evaluates and reviews policies and other documentation in a timely manner,
- R3 Strengthen the link between self-evaluation activity and the improvement planning process.

Ysgol Y Ddraig Inspection Report concluded most pupils, including those with additional learning needs, develop a broad range of key learning skills, such as resilience and being able to evaluate their own work. This enables them to make good progress as confident young citizens by the time they leave the school. It is noted that the school works closely with external agencies to support vulnerable pupils and has prepared staff well to enable them to tailor provision to individual needs. There is a positive relationship with parents and carers who have appreciated the support offered by the school for well-being and the good communication and access to blended learning during the pandemic. The Report recommended the following improvements:

- R1 Improve opportunities for pupils from Year 4 to Year 6 to use the numeracy skills in their work across the curriculum,
- R2 Improve pupils' Welsh language skills,
- R3 Improve the behaviour and attitudes to learning of a few older pupils.

In Estyn's response to the consultation, they concluded that there were no reservations about the Vale of Glamorgan Council permanently relocating the SRB to Ysgol y Ddraig. Estyn considered that the proposal is likely to, at least, maintain the standard of education provision in the area. Estyn's response did note some areas of the consultation document which required the proposer to expand on the

information provided. The response to these concerns is outlined under the relevant themes under Section 5.

Overall, it is concluded that the proposal would likely have a positive impact on quality and standards in education by providing:

- Improved ICT infrastructure, collaborative breakout areas, and effective circulation due to the delivery of the school under Band A of the Sustainable Communities for Learning Programme which requires new schools to be built to modern standards.
- Opportunities for professional development for teaching staff throughout Ysgol Y Ddraig in relation to Speech, Language and Communication Needs.
- A central location within the Authority to provide a specialist resource base for Speech, Language and Communication Needs in a more accessible location to a wider area of the Authority.

4.2. COMMUNITY IMPACT

A Community Impact Assessment was undertaken and published alongside the consultation document. The impact assessment identifies that the proposal would likely have a neutral impact on the local community across 8 of the 8 measures assessed. Overall, the proposal would likely have a neutral impact on the local community.

The proposal would provide targeted support for pupils with Speech, Language and Communication Needs within a suitable mainstream primary school environment in order to ensure that pupils reach their full potential. Additionally pupils and staff would have access to improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.

4.3. TRAVEL ARRANGEMENTS

The Council has a statutory duty to provide free school transport for pupils of statutory school age who reside beyond walking distance to the nearest appropriate school. In accordance with 'The Learner Travel (Wales) Measure 2008'.

Mainstream primary aged pupils are provided with free school transport if they live 3 miles or further from their nearest suitable school.

ALN pupils with specific travel requirements which cannot be met with reasonable adjustment on mainstream transport will have their eligibility determined by the ALN Team.

ALN pupils will be eligible for free transport if they are assessed as having severe and/ or complex difficulties and are attending a special school or specialist resource base as directed by the Complex Needs Team or a class in a mainstream school

which is 2 miles or further (primary aged pupils) from the parental home address as measured by the shortest available walking route.

Consideration will be given for free school transport for ALN pupils living within the 2-mile limit on an individual basis, complying with Section 9 of the Learner Travel (Wales) Measure 2008, ensuring fairness and compliance with relevant equality legislation to ensure no unlawful discrimination between learners. This decision will be made in consultation with all relevant parties. If a pupil cannot walk to school (either with the support of an appropriate adult or independently depending on their age/ability) because of the nature of their additional learning needs or disability, the council will provide free home to school transport even if the distance is less than the statutory limit. The decision on this will be made by the Passenger Transport Team in conjunction with schools and the Complex Needs Team. If possible and in conjunction with the agreement of the learner, parent/carer, the school and School Improvement and Inclusion Service, escort provision may be provided, instead of transport, to enable the pupil to get to school independently. This promotes sustainable modes of travel and encourages independent living as well as health and well-being.

5. ANNEX A - A SUMMARY OF KEY ISSUES RAISED BY STATUTORY CONSULTEES

The following summarises the key themes raised during the formal consultation period. The issues present an overview of responses and are not intended to be verbatim. All written responses have been made available to the Council's Cabinet.

5.1. ISSUES RAISED IN RELATION TO THE PROPOSAL:

THEME 1

Proposal does not fully consider the impact on Welsh medium education at Ysgol Y Ddraig.

Respondents raised concerns that the proposal did not highlight how Ysgol y Ddraig will seek to improve Welsh language provision through its existing curriculum framework.

Council's response to the concerns raised

Although Ysgol Y Ddraig teaches predominantly through the medium of English, the school aims to achieve high standards in Welsh language to contribute to the Council's commitment to encouraging bilingual speakers. The proposal will continue to contribute to the Council's commitments in the Welsh in Education Strategic Plan (WESP), which aims to ensure that demand for Welsh medium education can be met in the long-term, in line with Welsh Government's National Gymraeg 2050 strategy and contributing to its ambitious target of 1 million Welsh speakers by 2050.

In addition, the Curriculum and Assessment (Wales) Act 2021 established the Curriculum for Wales in law and replaced the basic curriculum. The Act sets out the four purposes of the curriculum in law. It also sets out that Welsh language is a mandatory element as part of the 3 to 16 learning continuum. The requirements of the Act come into force in September 2022. Consequently, the school will be required to provide Welsh language as part of the curriculum from September 2022.

It is noted that the Estyn Inspection for both schools recommended Welsh language proficiency could be improved. The implementation of the new curriculum will help to focus learning in all schools on Welsh language as it is an integral part of the Curriculum for Wales. In addition to this, the Council's WESP includes objectives to improve Welsh proficiency in relation to all schools. The relevant outcomes which will help improve Welsh language are set out below:

- More opportunities for learners to use Welsh in different contexts in school (outcome 5)
- An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) in accordance with the duties imposed by the

Additional Learning Needs and Education Tribunal (Wales) Act 2018 (Outcome 6).

- Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh (Outcome 7)

The implementation of the Council's WESP outcomes is considered to ensure the improvement of Welsh language over the next 5 and 10 year periods.

THEME 2

Transport implications should be considered in more detail for pupils

Respondents raised concerns that the proposal did not adequately address the additional travel time that pupils previously educated at Llandough would have due to the relocation. Respondents considered more specific information on suitable travel arrangements for pupils with speech, language and communication needs should be included.

Council's response to the concerns raised

Currently the SRB accommodates 16 pupils but has capacity for 20 places. The pupils attending the SRB travel from across the Authority with some pupils travelling as far as 30.9km to attend Llandough Primary School. However, it is noted that a higher number of pupils currently attending the SRB are within walking distance of Llandough Primary School. The table below compares the difference in distances and travel times for pupils attending the SRB at Llandough Primary School and Ysgol Y Ddraig:

Pupil ID	Distance to Llandough Primary (km)	Travel Time to Llandough Primary (mins)	Distance to Ysgol Y Ddraig (km)	Travel Time to Ysgol Y Ddraig (mins)
1	23.4	28.1	1.9	2.3
2	22.4	26.8	2.9	3.5
3	20.4	24.5	5.5	6.7
4	30.9	37.1	8.9	10.6
5	30.9	37.1	8.9	10.6
6	6.9	8.3	18.0	21.5
7	6.8	8.2	19.5	23.4
8	6.2	7.5	18.6	22.4
9	6.6	7.9	17.5	21.0
10	6.6	7.9	17.5	21.0
11	2.3	2.7	24.9	29.9
12	3.2	3.8	22.8	27.4
13	4.0	4.8	25.8	30.9
14	2.3	2.8	24.8	29.7
15	2.7	3.3	25.2	30.2
16	19.0	22.8	6.0	7.2

Average	12.2	14.6	15.5	18.7
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Key:

Eligible for Free School Travel	Walking Distance
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There would be less pupils currently attending the school who would be within walking distance of the proposal, however, as the SRB is utilised by the whole Vale it is considered likely the travel times for pupils will change. This is reflected in historic data for the SRB with more pupils traveling from the western Vale in previous years.

It is noted that the location of Ysgol Y Ddraig is more centrally located within the Authority than the SRB at Llandough and is easily accessible from the B4265 which links with the wider strategic network in the Authority.

In terms of the type of travel arrangements, Additional Learning Needs (ALN) pupils with specific travel requirements which cannot be met with reasonable adjustment on mainstream transport will have their eligibility determined by the School Improvement and Inclusion Team. In undertaking assessments of a child's additional learning needs the School Improvement and Inclusion Team will gather information from a range of key professionals and determine the provision and placement necessary to meet those needs. Any individual requirements for transport will be assessed as part of this process in consultation with the school transport service.

THEME 3

Funding implications not properly identified

Respondents wished to understand how the SRB would be funded in the long term.

Council's response to the concerns raised

The funding for the SRB is not a budget that is delegated within the schools funding formula. Instead, it is a centrally retained budget which funds two teachers and four learning support officers. For 22/23 the budget to fund the staff for the SRB is £223,525. With regards to safeguarding the funding, there are no plans to cut this provision, the budget for 23/24 will be based on the same formula albeit with growth allocated to reflect inflation.

The school will also receive £11,488 via the mainstream funding formula which covers additional costs in relation to the pupils within the SRB such as resources. Further information on the Council's funding formula can be found using the following link:

[Mainstream Schools funding Formula 2223 VOGC english \(valeofglamorgan.gov.uk\)](https://www.valeofglamorgan.gov.uk/valeofglamorgan/council/council-services/council-services-mainstream-schools-funding-formula-2022-23-vo-gc-english)

Lack of detail relating to SRB staff requirements and training

Respondents were concerned that no detail was provided on the level and type of qualifications required for the SRB teachers. It was considered further explanation would be appropriate on how the SRB teachers would support the mainstream school and what training would be available to staff teaching pupils in the mainstream classes for pupils who attend the SRB.

Council's response to the concerns raised

SRB staff have to be qualified and experienced classroom mainstream or specialist teachers. It is desirable for them to have a qualification such as a diploma in speech, language and communication or additional ALN qualification plus further training in speech, language and communication needs, and /or experience of working with pupils with speech, language and communication needs.

Whole school inset days have been provided for Y Ddraig on speech, language and communication needs and worked with staff / advised on specific pupils, through outreach work and school INSET sessions. The school is working with the Local Authority and the staff to fully integrate them into the fabric of the school , to ensure that base staff access training and also provide more training on a regular basis for Y Ddraig staff.

SRB staff do not teach in the mainstream school, but would support pupils form the base in mainstream schools. They receive ALN training through specialist cluster work and ALNCO days and received mainstream training through the INSET in school.

In terms of how the SRB interacts with mainstream schools, pupils are dual registered with their home schools and spend 3 days in the resource base and 2 days in their home school. This model enables pupils to be taught and practice specific speech and language skills within the base and practice them through the week, in their home schools.

The pupils are supported in their mainstream schools by the resource base LSAs and teachers. By supporting pupils in their mainstream schools this allows speech and language skills demonstrations, support, and training to go into schools on a weekly basis, allowing specialist staff to model strategies, and enabling schools to build expertise in working with pupils with speech and language needs.

It also allows children to be fully included in their mainstream school. The model was designed in conjunction with the NHS Speech and Language Therapy Service. The SRB staff engage with the mainstream schools for the teachers to ensure strategies

are in place and share advice and support to staff to ensure pupils with speech, language and communication needs can develop in a mainstream school setting.

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6. ANNEX B - A SUMMARY OF COMMENTS RECEIVED IN FAVOUR OF THE PROPOSAL.

This section provides the key themes raised during the formal consultation period by those in favour of the proposal. The following presents an overview of responses and are not exhaustive or intended to be verbatim. All written responses have been made available to the Council's Cabinet.

THEME 5

Support change in location

The change in location was supported. It was noted that the travel times for pupils would vary regardless of the location of the SRB.

THEME 6

Proposal provides improved facilities for SRB

Consultees noted that the proposal would provide modern learning facilities at Ysgol Y Ddraig which was developed under Band A of the Sustainable Communities for Learning Programme. The relocation of the SRB also helps manage capacity at Llandough Primary School due to more space being made available for mainstream pupils.

7. ANNEX C - FREQUENTLY ASKED QUESTIONS.

This section provides updated frequently asked questions in relation to the proposal.

What is the intended timescale of the proposal?

The permanent relocation to Ysgol Y Ddraig school building is due to be completed for January 2023.

How would pupils be allocated a place at the SRB?

The Council would allocate pupils to the SRB in consultation with the leadership of the SRB at Ysgol Y Ddraig. This would be based on an assessment of the individual needs of the pupils.

Who would manage and support learners attending the SRB?

Ysgol Y Ddraig would receive additional funding for the SRB through the mainstream school funding formula which would cover additional costs in relation to the pupils within the SRB such as resources to ensure the appropriate support is available.

The school would appoint a leader to manage the SRB with staff from the original SRB at Llandough Primary School relocating to Ysgol Y Ddraig to support individual learners. The purpose of the SRB is to provide additional support to pupils to ensure they can access mainstream education.

How will pupils travel to the relocated SRB?

Mainstream primary aged pupils are provided with free school transport if they live 2 miles or further from their nearest suitable school.

However, ALN pupils who have specific travel requirements which cannot be met with reasonable adjustment on mainstream transport will be eligible for free transport if they are assessed as having severe and/ or complex difficulties and are attending a special school or specialist resource base as directed by the Complex Needs Team or a class in a mainstream school which is 2 miles or further (primary aged pupils) from the parental home address as measured by the shortest available walking route.

Ysgol Y Ddraig supports travel to the school by active modes of travel such as walking and cycling where possible. This would extend to ALN pupils where appropriate.

Will the proposal have a negative impact upon existing pupils at Ysgol Y Ddraig?

Ysgol Y Ddraig is a 2-form entry school and has capacity for 420 pupils. Currently there are 289 pupils attending the school set over 14 classrooms. Due to the surplus capacity at the school, not all the classrooms are utilised. The SRB would occupy 2 vacant classrooms on the ground floor of the school. As these rooms are not currently used by pupils it is not considered that this will detract from their learning environment.

Furthermore, the SRB will be incorporated into the operations of Ysgol Y Ddraig allowing for sharing of knowledge between staff, helping to improve best practice at the school. Overall, the inclusion of the SRB at Ysgol Y Ddraig will benefit both staff and pupils in the long term.

8. ANNEX D - RESPONSE FROM ESTYN

In accordance with the requirements of the School Organisation Code 2018, a copy of the consultation document was sent to Estyn.

Estyn response to the proposal by the Vale of Glamorgan Council to relocate the SRB at Llandough Primary School to Ysgol Y Ddraig from January 2023

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.

Introduction

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.

Summary/Conclusion

This consultation is as a result of the Vale of Glamorgan Council's proposal to identify a specialist resource base (SRB) at Ysgol y Ddraig. The Council proposes to permanently relocate the specialist resource base from Llandough Primary School to Ysgol y Ddraig from January 2023.

Due to Covid restrictions and the limitations of the building at Llandough Primary School, the SRB has been temporarily relocated to Ysgol y Ddraig since the start of the Covid pandemic.

This proposal clearly states the Council's commitment to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In

order to achieve this ambition, the Council states that it is essential that they ensure schools remain sustainable, reflect the needs of the local communities, and are equipped with the best possible learning environments. This commitment is welcomed by Estyn.

Based on most recent intelligence Estyn has no reservations about the Vale of Glamorgan Council permanently relocating the SRB to Ysgol y Ddraig. Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area.

Description and benefits

The proposal states very clearly the rationale for relocating the SRB temporarily to ensure the safety of pupils and staff during the Covid-19 pandemic. The relocation in March 2021 allowed for sufficient ventilation and social distancing in addition to providing the safe use of pupil toilets and the use of a separate entrance for SRB pupils. This relocation to a self-contained base effectively ensured that pupils and staff were safe and compliant with Covid regulations. The move from Llandough Primary School to Ysgol y Ddraig was temporary, with regular reviews planned and the intention of returning the SRB to Llandough Primary School.

Once the Covid-19 restrictions were eased, the proposers felt that the accommodation at Llandough Primary School was no longer fit for purpose. Local authority officers surveyed the accommodation at Llandough and concluded that extensive re-modelling of the school was required in order to provide a functional space for the provision going forward. The reason for this re-modelling was stated as being as a result of the limitations of the 'relatively old building on a limited site'. The cost of returning the SRB to Llandough after completing this work was estimated at a minimum of £50,000.

The proposal states that Ysgol Y Ddraig was constructed as part of Band A of the 21st Century Schools programme (now known as Sustainable Communities for Learning). A specific area of the building is proposed to be allocated for the SRB unit. The SRB is proposed to be accommodated within two adjacent classrooms with access to outdoor space.

The proposal states that the move would address a number of challenges and would:

- Provide targeted support for pupils with Speech, Language and Communication Needs within a suitable mainstream primary school environment in order to ensure that pupils reach their full potential.
- Provide improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Provide continuity of provision within the Vale for pupils with Speech, Language and Communication Needs.
- Provide opportunities for professional development throughout Ysgol Y Ddraig.
- Reduce reliance on costly out of county provision.

The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access additional information on both the Vale of Glamorgan's School Consultations page and on their social media sites. The proposal also contains links to an online response form and a copy of a form which can be submitted by post. It

also includes details of a consultation workshop which is to be held with pupils at both schools to gather their views about the proposal. The proposal includes clear dates for the consultation and a deadline for responses to be received. The document also states how responses will be used.

The proposal states that an Equality Impact Assessment (EIA) will be carried out on this proposal which will be reviewed after the consultation and at key points if the proposal proceeds. In addition, a Community Impact Assessment has been undertaken to determine any impacts this proposal may have on the local community. This assessment identified that the proposal is likely to have a neutral impact on the community.

The relocation of ALN provision will result in the loss of the Speech, Language and Communication Needs SRB at Llandough Primary School. However, ALN provision is not provided based on proximity to an SRB, with pupils attending from across the Authority.

The proposal considers the travel implications for pupils, but only states that the proposal would have no impact on the current travel arrangements. Transport is available for pupils eligible for a place in the SRB who live 2 miles or further from the school. The proposer states that consideration would be given to the appropriate mode of transport for those ALN pupils accessing the SRB by the Complex Needs team. The proposal would be strengthened by the addition of more specific information recognising the importance of suitable transport methods for pupils with speech, language and communication needs. In addition, the proposal does not adequately address the additional travelling time that pupils previously educated at Llandough Primary School may have. However, Estyn recognises that pupils from across the local authority attend the SRB.

The overall proposal considers the need for education through the medium of Welsh. It considers appropriately the implementation of the Welsh Language (Wales) Measure 2011 which would support the targets in the local authority's Welsh in Education Strategic Plan (WESP). There would be a negligible difference in the Welsh language provision for these pupils as both schools teach predominantly through the medium of English. However, both schools have recommendations in their most recent Estyn reports to improve the provision for Welsh language and culture. The proposers do not adequately reference the lack of Welsh Language provision for pupils with additional learning needs and how this proposal would make steps to address this shortfall. The proposal does highlight that Ysgol y Ddraig will seek to improve Welsh language provision through its existing curriculum framework. Nevertheless, in light of the recent Estyn report identifying underdeveloped Welsh language provision, more information on how this will be addressed would be welcomed.

The proposal appropriately considers the financial costs of the SRB and states that no capital funding is required to undertake the relocation. The implementation of the proposal does not require amendments to the Ysgol Y Ddraig school building, however costs savings would be made if the changes are no longer required at Llandough Primary School. The funding for the SRB is held centrally within the Learning & Skills Directorate. This funds two full time teachers plus four full time learning support assistants. The school will also receive funds via the mainstream funding formula which covers additional costs in relation to the pupils within the

SRB such as resources. It would be beneficial to know more information about future funding of this resource.

The proposer states that the staffing of the SRB will be retained in the new location. However, details are included in the financial elements of the proposal which indicate that transportation costs for staff being relocated from Llandough to Ysgol y Ddraig are currently being covered by the Council. There is no explanation of whether this funding will continue and how the move will impact the current staff in terms of travel time and travel costs.

Educational aspects of the proposal

In considering the impact of the proposal on the quality of outcomes, provision and leadership and management, the Council provided a summary of relevant observations from the most recent Estyn inspection of Llandough Primary School, the National Categorisation of school report and internal assessments of the buildings condition and suitability of Ysgol y Ddraig. At the time of the proposal, the most recent Estyn report was not available for Ysgol y Ddraig. The proposal stated the date of publication of this report and this report has been considered in this response.

Estyn inspected Llandough Primary School in March 2022 and Ysgol y Ddraig in May 2022. It is noted in the most recent Estyn inspection for Llandough Primary School, 'Pupils from mainstream classes have benefited from specialist support in the learning resource bases to improve their communication skills.' The proposal would continue to build on this support with the planned consistency of staffing within the SRB.

It is noted in the most recent Estyn inspection for Ysgol y Ddraig that 'the interim executive headteacher and head of school lead a fully committed staff who care for and support all pupils to achieve their best.' In addition, 'Staff roles and responsibilities are clear and leaders model professional values and behaviours effectively. There is a strong sense of teamwork and shared commitment to ensuring that all pupils matter.'

Inspectors also found that provision for additional learning needs is very effective across Ysgol y Ddraig. They noted that there was a clear and well thought out plan for a smooth transition to the new arrangements to support pupils with additional learning needs. A culture of inclusion was clearly evident during the inspection which inspectors felt was a strength of the school. This reflects comments made by the proposer in the consultation document relating to the strong features of the provision at Ysgol y Ddraig.

In the most recent school categorisation in January 2020, Llandough Primary School was categorised as a yellow school (An effective school which is already doing well and knows the areas it needs to improve). Ysgol y Ddraig was categorised as a green school (a highly effective school which is well run, has a strong leadership and is clear about its priorities for improvement).

The proposer asserts that relocating the SRB permanently to Ysgol Y Ddraig would provide a 21st century learning environment, including improved ICT infrastructure, collaborative breakout areas, and effective circulation. This would enable a teaching

and learning environment to better meet the needs of learners. The proposed permanent relocation would allow for further development of a curriculum filled with rich experiences that challenges children, raises attainment, and supports pupils' wellbeing.

The SRB is currently staffed by two full time teachers plus four full time learning support assistants. It is proposed that SRB will be incorporated into the operations of Ysgol Y Ddraig allowing for sharing of knowledge between staff, helping to improve best practice at the school. However, no detail is provided on the level or type of qualifications required for the SRB teachers and there is no explanation of how a full-time teacher in the SRB will also be able to support the mainstream school. The proposal would be further strengthened by discussing what training would be provided for the staff who may be teaching learners in the mainstream classes and how the school will meet the needs of the learners within the mainstream provision.