

Meeting of:	Cabinet
Date of Meeting:	Thursday, 05 January 2023
Relevant Scrutiny Committee:	Learning and Culture
Report Title:	Proposal to Transfer Specialist Resource Base at Llandough Primary to Ysgol Y Ddraig
Purpose of Report:	To advise Cabinet of the outcome of the statutory notice to relocate the Special Resource Base at Llandough Primary School to Ysgol Y Ddraig.
Report Owner:	Cabinet Member for Education, Arts and the Welsh Language
Responsible Officer:	Paula Ham, Director of Learning and Skills
Elected Member and Officer Consultation:	<p>Officers Consulted:</p> <p>Trevor Baker: Head of Strategy, Community Learning & Resources</p> <p>Lisa Lewis: Operational Manager, Strategy and Resources</p> <p>David Davies: Head of Additional Learning Needs and Wellbeing</p> <p>Nathan Slater: Project Manager, Sustainable Communities for Learning</p> <p>Gemma Jones: Operational Manager, Accountancy</p> <p>Public consultation with all interested parties has been carried out, in accordance with legislation.</p> <p>Local Ward Members have been consulted</p> <p>Committee Reports.</p>
Policy Framework:	This is a matter for Executive decision by the Cabinet

Executive Summary:

The Council undertook a statutory consultation exercise from 13th July, 2022 to 22nd September, 2022 on the proposal to relocate the Special Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig. During the consultation exercise, 4 individual responses were received by the consultation closing date of 22nd September, 2022. Regarding the representations made all 4 responses were in favour of the proposal.

On 3rd November, 2022, Cabinet considered the consultation report which included an overview of the feedback submitted during the consultation period. Cabinet determined to progress the proposal through the publication of a statutory notice, which was published on 9th November, 2022. In accordance with the School Standards and Organisation (Wales) Act 2013, any person can object to the proposal within 28 days from the publication of the statutory notice.

The Council received no objections by the end of the 28 day objection period. A decision is now required on whether to implement the proposal to relocate the Special Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig from January 2023.

Recommendations

- 1.** That Cabinet considers this report, the consultation report (Appendix A), the Consultation Response report (Appendix C) and other appendices included as part of this report, comprising the Equality Impact Assessment (Appendix D), Community Impact Assessment (Appendix B), Statutory Notice (Appendix E) and Objection Period Summary Report (Appendix F).
- 2.** That Cabinet approves implementation of the proposal to make regulated alterations under section 2.3 of the School Organisation Code 2018 to relocate the Specialist Resource Base to Ysgol Y Ddraig from January 2023.
- 3.** That the use of paragraph 15.14.2(ii) of the Council's Constitution (urgent decision procedure) be authorised in order to avoid unnecessary delays.

Reasons for Recommendations

- 1.** To ensure that all relevant information is considered by Cabinet in reaching a decision on whether to implement the proposal.
- 2.** Following the completion of a period of statutory notice, a decision is required on whether to implement the proposal to ensure the Specialist Resource Base can continue to operate in the Vale of Glamorgan in a modern education environment.
- 3.** To ensure the proposal can be implemented on 9th January, 2023, at the start of the school term. This is a requirement for proposals which relate to staffing issues such as a relocation.

1. Background

- 1.1** Llandough Primary School has hosted the Local Authority provision for pupils with Speech and Language barriers to learning since 2002. The provision is made up of classes for pupils aged 4-11 year with Speech, Language and Communication Needs. The staff are employed by the Local Authority and the school receives a resource budget based on the number of pupils attending the provision.
- 1.2** The 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.
- 1.3** The pupils are supported in their mainstream schools by the resource base Learning Support Assistants (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.
- 1.4** 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.

- 1.5** 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.
- 1.6** This model was adapted due to Covid restrictions in order to manage the contacts of pupils from different settings and to mitigate the risk of spreading infection between schools. As a result, pupils have been spending alternate weeks in the base and their mainstream schools, rather than 3 days in the resource base and 2 days in school on a weekly basis. Now restrictions have eased and because of the facilities available at Ysgol y Ddraig, it will be possible to revert to the original model which will provide the optimal support for the needs of the pupils.
- 1.7** On 23rd June, 2022 the Council’s Cabinet authorised the Director of Learning & Skills to undertake a consultation on the proposal to transfer the specialist resource base (SRB) at Llandough Primary to Ysgol Y Ddraig from January 2023 (Cabinet Minute C25 refers).
- 1.8** The Council’s Cabinet considered the Consultation Report (Appendix C) on 3rd November, 2022 and determined to progress the proposal through the publication of a statutory notice. (Cabinet minute C121)
- 1.9** The statutory notice (Appendix E) was published on 9th November, 2022. In accordance with section 49 of the Act, any person could object to the proposal before the end of 28 days beginning with the day on which the proposals were published, that is to say by 7th December, 2022.
- 1.10** The Council received no formal objections to the proposal during the objection period. 2 late representations were submitted to the proposal after the objection period closed, these raised issues regarding the additional travel time for staff and associated expenses. Although the objections were submitted outside the required 28 day period a response has been provided in the attached Objection Period Summary Report at Appendix F.

2. Key Issues for Consideration

Process

- 2.1** The Welsh Government issued a School Organisation Code in 2018 that came into effect in November 2018. The Local Authority must “act in accordance with the Code” as determined by the School Standards and Organisation (Wales) Act 2018.
- 2.2** In line with the School Organisation Code (2018) requirements the statutory notice was published in English and Welsh on the Council's website and posted at the main entrances of Whitmore High School. The school were provided with copies of the notice to distribute to pupils, parents, carers and guardians, governing body and staff members. Links to the notice were also sent via email.

A copy of the statutory notice was also issued to prescribed consultees as outlined in the School Organisation Code (2018).

- 2.3** All objections submitted during the notice period had to be made in writing or by email.
- 2.4** Under section 53 of School Standards and Organisation (Wales) Act 2013, determination by the proposer must be made within 16 weeks (112 days) of the end of the objection period. Where the proposer fails to determine the proposal within the period of 16 weeks it is taken to have withdrawn the proposal and it is required to republish the proposals if it wishes to proceed.

Objections

- 2.5** By the end of the objection period on 7th December, 2022, the Council had received no objections. However, 2 late representations were submitted to the proposal after the objection period closed, these raised the following issues:
- Extended travel times to and from proposed work place,
 - Additional expense due to travel,
 - Extended work hours due to the need to use public transport,
 - Compensation required due to the change to working terms and conditions.
- 2.6** Although the objections were submitted outside the required 28-day period a response has been provided in the attached Objection Period Summary Report at Appendix F. A summary of the Council's response is provided below:
- 2.7** Contractually, all LSA staff are informed of a primary base of work, but this can be subject to change following the relevant notice period to any other location within the boundary of the Vale of Glamorgan. The contracts confirm no compensation or excess mileage allowance will be payable in respect such a change. The two teachers employed for the SRB provision are subject to different contractual arrangements. Their contracts do not include reference to working in other locations. However, as part of the proposal all staff have been given the relevant notice and the statutory consultation periods have been followed in relation to the proposal to allow staff to raise concerns and objections to the proposal to be considered by the Council. As part of the consultation process the Council have worked with the relevant trade unions to outline the changes to staffing arrangements due to the relocation proposal to ensure staff interests were represented and addressed.
- 2.8** Overall, it is considered on balance the new location for the SRB would benefit the intended users of the service due to access to newer facilities.

Quality and Standards

- 2.9** The proposal would have an overall positive impact on the existing and future pupils at Ysgol Y Ddraig and the SRB following the relocation of the unit. 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.

Community Impact

- 2.10** 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.
- 2.11** 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.

Travel Arrangements

- 2.12** 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'. 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.
- 2.13** ALN pupils in the SRB 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. In addition where specialist travel arrangements are not required pupils who live 2 miles or further away from the school will be eligible for standard free school transport.

Resourcing of education and other financial implications

- 2.14** 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.
- 2.15** 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.

Transition

- 2.16** The proposal would mean 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.
- 2.17** The provision is made up of classes for pupils aged 4-11 year with Speech, Language and Communication Needs. The staff are employed by the Local Authority and the school receives a resource budget based on the number of pupils attending the provision.
- 2.18** The 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.
- 2.19** 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.
- 2.20** 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.
- 2.21** 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.
- 2.22** The Council would fully support the staff and governing body to ensure the successful implementation of the proposal.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** The Well-being of Future Generations Act 2015 (“the 2015 Act”) requires the Council to think about the long-term impact of their decisions, to work better with people, communities, and each other and to prevent persistent problems such as poverty, health inequalities and climate change.

- 3.2** The Council has committed as part of the Corporate Plan 2020-2025 to achieving a vision of 'Working Together for a Brighter Future'. This plan is reflective of the Welsh Government's Well-being of Future Generations Act and is comprised of four Well-being objectives to deliver this vision:
- Objective 1 - To work with and for our communities
 - Objective 2 - To support learning, employment, and sustainable economic growth
 - Objective 3 - To support people at home and in their community
 - Objective 4 - To respect, enhance and enjoy our environment
- 3.3** To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council. The 2015 Act makes it clear the listed public bodies must work to achieve all the goals, not just one or two, these being:
- A prosperous Wales
 - A resilient Wales
 - A healthier Wales
 - A more equal Wales
 - A Wales of cohesive communities
 - A Wales of vibrant culture and Welsh Language
 - A globally responsible Wales
- 3.4** These proposals contribute to achieving the wellbeing goals by:
- Generating financial savings to ensure a more efficient financial model for education in the Vale.
 - Ensuring a fairer distribution of specialist resources across the Vale.
- 3.5** The 2015 Act imposes a duty on all public bodies in Wales to carry out "sustainable development", defined as being, "The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." The action that a public body takes in carrying out sustainable development includes setting and publishing well-being objectives and taking all reasonable steps in exercising its functions to meet those objectives.
- 3.6** The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, these being:
- The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
 - Considering how the Council's objectives impact upon each of the wellbeing goals listed above.

- The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the Council services.
- Acting in collaboration with other persons and organisations that could help the Council meet its wellbeing objectives.
- Acting to prevent problems occurring or getting worse.

3.7 These proposals meet the five ways of working by:

- Responding to the need to ensure that there is a well-resourced specialist provision available to pupils.
- Making best use of schools that have an environment reflective of the national mission for education in Wales and future curriculum.
- Ensuring that schools remain sustainable, reflects the needs of local communities and are equipped with the best possible learning environments.
- Delivering rigorous consultation with open communication channels and numerous opportunities for stakeholders to engage throughout the process.
- Ensuring that schools are of the right size, in the right places and serving the educational needs of their local communities as part of the school organisation process.

3.8 The proposals have been appraised in terms of how they contribute to delivering upon the aspirations of the Act, the well-being goals, and the ways-of-working. This does not form part of the statutory consultation process but was considered beneficial to meeting the spirit of the Act.

4. Climate Change and Nature Implications

4.1 There are no climate and nature implications associated with the Report. It is noted that there is a high proportion of pupils which are within walking distance to the SRB at Llandough Primary School. However, pupils attend the SRB from across the Authority and this mix has changed in the past. Llantwit Major is an established settlement with good public transport connections and is more accessible to the western Vale. The new location of Ysgol Y Ddraig for the SRB is considered to be more centrally located in the Vale of Glamorgan and benefits from existing active travel routes within Llantwit Major should pupils from the immediate area attend the SRB.

5. Resources and Legal Considerations

Financial

5.1 The cost for the staff and the resources required to support the pupils attending the SRB would continue on the same basis as currently in place and therefore, will be funded from existing resources.

- 5.2** Transport costs for the temporary move of the SRB at Ysgol Y Ddraig are currently approximately £44,000 per annum including the transportation of staff. The transport costs to Llandough prior to the temporary move were £48,000 per annum. Transport costs can fluctuate considerably depending on the home address of the pupils attending the SRB. Therefore, no saving or increase to transport costs can be accurately forecast in the longer term. Pupils can attend from all areas of the Vale of Glamorgan resulting in cost fluctuations based on arising need.

Employment

- 5.3** The SRB unit would be managed centrally by the Directorate of Learning & Skills in consultation with the headteacher and governing body of Ysgol Y Ddraig. The SRB area has been designed to accommodate up to 20 learners. Staff from the existing SRB at Llandough Primary School would be permanently relocated to Ysgol Y Ddraig to support learners within the SRB.
- 5.4** Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

Legal (Including Equalities)

- 5.5** Part 1 of the Education Act 1996 (“the 1996 Act”) imposes a number of general duties on all local authorities in Wales. The general duty in section 13 of the 1996 Act is to contribute (so far as the Council’s powers enable them to do so) towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education are available to meet the needs of the population of their area.
- 5.6** Section 13A(3) of the 1996 Act states that a Local Authority in Wales must ensure that their relevant education functions and their relevant training functions are exercised by the authority with a view to promoting high standards, and promoting the fulfilment of learning potential by every person to whom the subsection applies, including those who are of compulsory school age or are below school age and are registered as pupils at schools maintained by the authority.
- 5.7** Section 14 of the 1996 Act then provides that the Council shall secure that sufficient schools for providing primary education and secondary education are available in the Council’s area. Schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity for appropriate education. Appropriate education means education which offers such variety of instruction and training as may be desirable in view of (a) the pupils’ different ages, abilities and aptitudes; and (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.

5.8 Powers for Councils to develop school organisation proposals are governed by the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. The Council is to comply with the relevant provisions in connection with the proposal.

(1) School Standards and Organisation (Wales) Act 2013

5.9 Part 3 of the School Standards and Organisation (Wales) Act 2013 (“the 2013 Act”) is concerned with school organisation. The Welsh Ministers have issued the School Organisation Code (“the Code”). Local authorities must, when exercising functions under Part 3 of the 2013 Act, act in accordance with any relevant requirements contained in the Code and must have regard to any relevant guidelines contained in it. A copy of the Code is found here:

<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>

5.10 Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals.

5.11 Section 48(2) of the 2013 Act provides that before publishing such proposals, a proposer (in this case, the Council) must consult on its proposals in accordance with the Code. The consultation document must be issued during the term time of the schools affected and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.

5.12 The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn’s view (as provided in its consultation response) of the overall merits of the proposal.

5.13 If a Local Authority decides to proceed with a proposal to make regulated alterations to a maintained school, it must publish proposals to that effect in accordance with the Code (section 48(1)). The proposal must be published by way of statutory notice. Chapter 4 of the Code sets out specific requirements as to how statutory proposals must be published. Proposals must be published on a school day and the objection period must include 15 school days (in addition to the day on which it is published).

5.14 Section 49 of the 2013 Act makes provision for any person to object to proposals published under section 48 within the objection period of 28 days. The Council must then publish a summary of all objections made to the proposal and its response to those objections before the end of 7 days beginning with the day of the Council’s determination.

5.15 The Local Authority proposer must then determine whether the proposals should be implemented. Where a Local Authority’s proposals have received objections, and require determination, those objections will be carefully considered before a final determination is made. A further report to Cabinet will be prepared before any such determination is made. This determination must take place before the end of 16 weeks beginning with the end of the objection period.

(2) The Code

5.16 The Code contains the following elements:

- It imposes requirements in accordance with which relevant bodies (including all local authorities in Wales) must act. Where mandatory requirements are imposed by the Code or by the 2013 Act or another statute or statutory instrument, it is stated that the relevant bodies must comply with the particular provision. Where practices are prohibited, it is stated that the relevant bodies must not use this practice.
- It includes statutory guidance to which the Council must have due regard and sets out the policy context, general principles and factors that should be taken into account by those bringing forward proposals to reconfigure school provision and by those responsible for determining proposals. Where guidance is given by the Code, it is stated that relevant bodies should follow this guidance unless they can demonstrate that they are justified in not doing so.

5.17 Paragraph 1.1 of the Code sets out the key background principles and policies, which should be taken into account by the Council in developing school organisation proposals. These include:

- United Nations Convention on the Rights of the Child
- The Well-being of Future Generations (Wales) Act 2015 (see below)
- Cymraeg 2050, A Million Welsh Speakers
- Action Plan, Cymraeg 2050
- One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy
- Child Poverty Strategy for Wales (issued February 2011 Information document number 95/2011), or any successor strategy
- Faith in Education
- Local plans for economic or housing development
- Welsh in Education Strategic Plans (made under part 4 of the School Standards and Organisation (Wales) Act 2013)
- Children and Young People's Plans (or successor plans)
- 21st Century Schools – Capital Investment Programme and the relevant wave of investment
- Learner Travel Statutory Provision and Operational Guidance 2014:
<https://beta.gov.wales/learner-travel-statutory-provision-and-operational-guidance>
- Measuring the capacity of schools in Wales, Circular No: 021/2011:
<https://beta.gov.wales/measuring-capacity-schools-guidance>
- Children and Young People's National Participation Standards

5.18 Section 1.4 of the School Organisation Code 2018 outlines that Councils should consider the extent to which the proposal would support the targets in the approved Welsh in Education Strategic Plan (WESP).

(3) The Well-being of Future Generations (Wales) Act 2015

5.19 The Well-being of Future Generations (Wales) Act 2015 ('the 2015 Act') sets out new ways of working – of planning and making decisions – for local authorities and other public bodies it lists. The aim is that, by improving these things, the overall well-being of Wales will be better improved by the things public bodies collectively do. The Act and the statutory guidance makes it clear that local authorities must, in the course of their corporate planning and their delivery against those plans:

- balance short term needs against the ability to meet long term needs;
- think about the impact their objectives have on other organisations' objectives, and on the well-being of Wales, in an integrated way;
- involve in those processes people who reflect the diversity of the population they serve;
- work together collaboratively with other organisations to better meet each other's objectives; and
- deploy their resources to prevent problems from getting worse or from occurring in the first.

5.20 The statutory guidance, for organisations subject to the Act, sets out the expectations for how the duties should be met:

<http://gov.wales/topics/people-and-communities/people/future-generations-act/?lang=en>

5.21 The Act itself is available to view online:

<http://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

5.22 Current practice on the use of surplus school accommodation, Information document No 158/2014.

(4) Equalities Act 2010

5.23 The Council has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Council's must in making decisions have due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics.

5.24 A full Equality Impact Assessment will be developed as part of the consultation exercise and will be included within the consultation report.

(5) The Equality Act (Authorities subject to a duty regarding Socio-economic Inequalities) (Wales) Regulations 2021

5.25 On the 10th and 11th March, 2021 respectively, the Equality Act (Authorities subject to a duty regarding Socio-economic Inequalities) (Wales) Regulations 2021

(SI 2021/295) and the Equality Act 2010 (Commencement No 15) (Wales) Order 2021 (SI 2021/298) were made, and the 'socio-economic' inequality duty under the Equality Act 2010 and make public bodies subject to the duty.

5.26 A commencement order and regulations were made concerning the coming into force of the public sector duty regarding socio-economic inequalities, as follows:

- *The Equality Act 2010 (Commencement No 15) (Wales) Order 2021 (SI 2021/298)* was made on 11 March 2021 brought section 1 (that is, the socio-economic inequality duty) and section 3 (enforcement for the purposes of section 1) of the Equality Act 2010 into force on 31 March 2021
- *The Equality Act (Authorities subject to a duty regarding Socio-economic Inequalities) (Wales) Regulations 2021 (SI 2021/295)* were made on 10 March 2021 and came into force on 30th March, 2021. The Regulations make specific Welsh public bodies subject to the socio-economic inequality duty when the duty is brought into force under the above Order.

5.27 The Socio-economic duty places a duty on the Council, as a public sector organisation in Wales, to consider how it might help reduce the inequalities associated with socio-economic disadvantage when strategic decisions are made, including decision which would include deciding priorities and setting objectives, such as:

- Strategic directive and intent.
- Strategies developed at Regional Partnership Boards and Public Service Boards which impact on a public body's functions.
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans).
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy).
- Changes to and development of public services.
- Strategic financial planning.
- Major procurement and commissioning decisions.
- Strategic policy development.

5.28 When making decisions, and reviewing previous strategic decisions, the Council needs to do the following:

- Take account of evidence and potential impact.
- Through consultation and engagement, understand the views and needs of those impacted by the decision, particularly those who suffer socio-economic disadvantage.
- Welcome challenge and scrutiny.
- Drive a change in the way that decisions are made and the way that decision makers operate.

- 5.29** When making a decision or reviewing a previously made strategic decision made after 31st March about how to exercise their functions, the Council must show that it has had 'due regard' (giving weight to a particular issue in proportion to its relevance) to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage. Those subject to the duty includes government ministers and departments, local authorities and NHS bodies.
- 5.30** This would form part of the full Equality Impact Assessment which would be developed as part of the consultation process.

6. Background Papers

- 6.1** None.

DIRECTORATE OF LEARNING AND SKILLS CONSULTATION DOCUMENT

CONSULTATION ON THE PROPOSAL TO TRANSFER
SPECIALIST RESOURCE BASE AT LLANDOUGH
PRIMARY SCHOOL TO YSGOL Y DDRAIG FROM
JANUARY 2023.



This document can be made available in Braille. Information can also be made available in other community languages if needed. Please contact us on 01446 709828 to arrange this.

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EXPLANATION OF TERMS USED IN THIS DOCUMENT

'AN' (Admission Number) - All maintained schools must admit pupils up to at least their published admission number. The admission number is the number of pupil places available in each year group.

'ALN' (Additional Learning Needs) - A pupil has additional learning needs if they have a learning difficulty or disability (whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for additional learning provision.

'Capacity' – The capacity of a school is the total number of statutory aged pupil places available; it excludes nursery places.

'Catchment Area' - The geographic area from which students are eligible to attend a local school. Catchment children will always take priority over applications from outside the catchment area however there is no guarantee that any child will be admitted to their chosen school.

'Community' - A type of state-funded school in which the local education authority employs the school's staff, is responsible for the school's admissions and owns the school's estate.

'Denominational' - Schools with a designated religious character e.g. Church in Wales.

'EA' (Equality Act) - The Act covers all aspects of school life to do with how a school treats pupils and prospective pupils, parents and carers, employees, and members of the community. Everything a school does must be fair, non-discriminatory, and not put individuals or groups of people at a disadvantage. In particular, a school must not discriminate, harass, or victimise a pupil or potential pupil in relation to; admissions, the way it provides education for pupils, how it provides pupils access to any benefit, facility, or service, and excluding a pupil or subjecting them to any other detriment.

'EIA' (An Equality Impact Assessment) - EIA is a process designed to ensure that a policy, project, or scheme does not discriminate against any protected groups.

'EM' (English Medium) – A school where teaching and learning is primarily conducted through the medium of English.

'LA' (Local Authority) - The Local Authority referred to in this document means the Vale of Glamorgan Council unless otherwise stated.

'NOR' (Number on Roll) - The number of pupils attending a school. Nursery places are excluded.

'PLASC' (Pupil Level Annual School Census) - In January of every year, verified information is collected by schools for submission to the Welsh Government. This includes the number of pupils

enrolled in each school, their age groups, home addresses, ethnicity and data on Welsh language, free school meals eligibility, special education needs and first language.

'SA' (School Action) - When a class or subject teacher identifies that a pupil has ALN they provide interventions that are additional to or different from those provided as part of the school's usual curriculum.

'SA+' (School Action +) - When a class or subject teacher and the ALN Co-ordinator are provided with advice or support from outside specialists, so that alternative interventions additional or different to those provided for the pupil through SA can be put in place.

'Section 106' - The Section 106 contribution is sought from anyone who has an interest in the building of a housing development, towards the costs of providing community and social infrastructure, educational provision, open space / play equipment, transport, or healthcare for those occupying the new homes.

'SRB' (Specialist Resource Base) - A facility within the school for children with special educational needs.

'Statemented' - A child has a Statement of Educational Need (SEN), otherwise known as ALN, if they have learning difficulties which require special educational provision to be made. A learning difficulty means that the child has significantly greater difficulty in learning than most children of the same age or that the child has a disability that needs different educational facilities from those that the school generally provides.

'WM' (Welsh Medium) - A school where teaching and learning is primarily conducted through the medium of Welsh.

1. INTRODUCTION

1.1. BACKGROUND

The Vale of Glamorgan Council is committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In order to achieve this ambition, it is essential that we ensure schools remain sustainable, reflect the needs of our local communities, and are equipped with the best possible learning environments.

The Council's Cabinet authorised the Director of Learning & Skills to undertake a **consultation from 13th July 2022 to 22nd September 2022** on a proposal to establish a specialist resource base at Ysgol Y Ddraig.

1.2. THE PROPOSAL

This document outlines the Council's proposal to permanently relocate the specialist resource base from Llandough Primary School to Ysgol Y Ddraig from January 2023.

This proposal is considered under section 2.3 of the School Organisation Code (2018). Section 2.3 of the School Organisation Code refers to Regulated Alterations of a school, which includes the transfer of any school to a new site.

1.3. RESPONDING TO THE PROPOSAL

The Vale of Glamorgan Council is committed to ensuring that consultations are meaningful, relevant, and appropriate for the communities that are involved, and the Council has a duty of care to ensure that proposals are clear, transparent, and reflective of those affected. This is a vision that can only be realised by working in partnership with schools, governors, parents, and the wider communities we all serve.

This consultation gives you the opportunity to ask questions and make comments that will be considered when the Council's Cabinet decides how to proceed.

Further information regarding planned stakeholder engagement sessions and how you can respond to the consultation is detailed in [Section 7 "Involving stakeholders and responding to the consultation"](#). This section also contains a link to the online survey and a free post address if you would like to submit a response via post. The response form can be found under [Section 8](#).

Under the School Organisation Code (2018), it is vital that any feedback be received by 22nd September 2022 in order to be considered as part of this consultation. Any items received after that date cannot be considered.

2. THE PROPOSAL

2.1. SUMMARY

The proposal is to relocate the existing Specialist Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig.

This proposal is considered under section 2.3 of the School Organisation Code (2018). Section 2.3 of the School Organisation Code refers to Regulated Alterations of a school. The element within this section which is relevant to the proposal is the relocation of SEN provision to a new site beyond 1 mile from the main entrance of the existing site.

2.2. WHAT WOULD THIS MEAN?

The proposal would mean 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.

Llandough Primary School has hosted the Local Authority provision for pupils with Speech and Language barriers to learning since 2002. The provision is made up of classes for pupils aged 4-11 year with Speech, Language and Communication Needs. The staff are employed by the local authority and the school receives a resource budget based on the number of pupils attending the provision.

The 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.

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 model was adapted due to Covid restrictions in order to manage the contacts of pupils from different settings and to mitigate the risk of spreading infection between schools. As a result pupils have been spending alternate weeks in the base and their mainstream schools, rather than 3 days in the resource base and 2 days in school on a

weekly basis. Now restrictions have eased and because of the facilities available at Ysgol y Ddraig, it will be possible to revert to the original model which will provide the optimal support for the needs of the pupils.

2.3. WHY ARE WE PROPOSING THE CHANGES?

The SRB provision at Llandough Primary School was moved to Ysgol Y Ddraig during the Covid-19 pandemic. The space at Llandough was considered to be too small for social distancing with insufficient ventilation to prevent the spread of the disease. Pupils from the resource base also shared toilets with year 1 pupils from the mainstream school which added to the risk of increased infection as pupils were not able to be contained in “bubbles” which were operating at this time.

The Council reviewed the SRB at Llandough Primary School to explore if any measures could be taken to make the space useable under Covid regulations. Though ventilation could be improved, and the social distancing eased by rotating pupils in and out of the SRB, this would not have been sufficient to meet the guidance at the time. Additionally, the use of toilets by more than one class was seen as an infection risk and this risk could not be mitigated. A number of options were considered which would keep all pupils and staff safe in both the SRB and school, whilst allowing access to the specialist provision. However, no solutions were found to ensure that all the pupils could access learning safely.

As a consequence, the Council investigated alternative options to deliver the provision from an alternative school site which had the space that would allow social distancing, good ventilation, and safe use of pupil toilets. This space was found at Ysgol Y Ddraig Primary School in Llantwit Major. Two full time classrooms with break out space, separate outside space, and separate toilets were accessed. The base could also be entered through a separate entrance. Thus, the base was self-contained, ensuring that pupils and staff were safe and compliant with Covid regulations.

The agreed arrangement was temporary and reviewed regularly, with the intention that the base would return to Llandough Primary School when Covid restrictions eased. It is only very recently that Covid restrictions have eased sufficiently to consider a return to Llandough Primary School. However, despite the easing of restrictions it is still evident that the accommodation available at Llandough Primary School is no longer fit for purpose and is not comparable with that available at Ysgol y Ddraig.

Local authority officers have surveyed the accommodation at Llandough and concluded that extensive re-modelling of the ground floor section of the school would be required in order to provide a functional space for the provision going forward. This re-modelling would cause significant disruption to the wider school and would also require additional funding to complete the works required. This is estimated as being a minimum of £50,000. In addition, because of the limitations of what is a relatively old building on a limited site, it would be impossible for any re-modelling to create the same standard of environment as

can be offered at Ysgol y Ddraig which is a newly built facility with all the benefits of a 21st century school.

As a result of the success of the temporary relocation and the availability of improved facilities at Ysgol Y Ddraig, it is therefore considered that the SRB would benefit from a permanent relocation to Ysgol Y Ddraig. This would allow the SRB to continue to benefit from the facilities available at the school and allow this group of children access to the best possible specialist provision for Speech, Language and Communication Needs.

3. IMPLICATIONS OF PROPOSAL

3.1. SCHOOL INFORMATION

The following section discusses potential implications of the proposal, including educational outcomes, finance, human resources, and transport.

The Council has collated information about the schools to help inform these potential implications. This includes the most recent Estyn inspections where available, National Categorisation of school report, and internal assessments of the buildings condition and suitability of Ysgol Y Ddraig.

3.2. EDUCATIONAL OUTCOMES

STANDARDS AND PROGRESS

The SRB would ensure pupils with Speech, Language and Communication Needs have access to specialist learning & resources in an improved environment. The base would also provide a safe environment for pupils to access during lunch and break times. Support would be targeted to meet the individual needs of pupils within the SRB. The specialist work of the resource provision would influence practice throughout the wider school which would benefit all staff and pupils.

Skilful and creative planning ensures a clear structure to lessons and a wide range of activities and approaches within the SRB. This has a positive impact on pupils' learning and progress. Strategies to identify and share effective practice are successful in improving learning and teaching across the school, for example, in developing authentic experiences for pupils.

Self-evaluation is a strong feature of Ysgol Y Ddraig, being comprehensive, robust, and involving all members of staff. The school has a clear timetable of monitoring activities and draws upon a range of first-hand information to inform their judgements. Self-evaluation makes a strong contribution to improving and maintaining good standards, as well as the quality of teaching and learning. Improvement planning is highly effective and takes account of local and national priorities.

The school's leaders give a high priority to developing the workforce and are highly effective in creating a culture and ethos of a 'learning organisation'. Performance management is closely aligned to pupil outcomes and school priorities. Robust and

comprehensive arrangements are in place for supporting the professional development of staff at all levels. All teachers are engaged in meaningful and planned professional development and undertake beneficial action research.

WELLBEING AND ATTITUDES TO LEARNING

The SRB would provide a safe environment for pupils with Speech, Language and Communication Needs to access throughout the school day. Access to an outdoor area is important for both classes; there are children with ALN in each class who need a space to explore and to regulate themselves in order to be in a ready state to learn. Providing an outdoor space is a crucial part of the universal provision within the SRB. Adults playing alongside the children in this environment provides a wealth of opportunities to develop play and language skills. There is an enhanced range of outdoor activities available.

In Ysgol y Ddraig there is a positive relationship with parents and carers who have appreciated the support for well-being, strong communication during the pandemic and access to blended learning provision of high quality.

With regard to Recruit, Recover, Raise Standards: the accelerating learning programme grant is being suitably deployed, focussing on the most vulnerable learners to ensure they continue to make progress and catch up accordingly. Similarly, the Pupil Development Grant is appropriately targeted at pupils in receipt of free school meals, with a strong emphasis on providing additional literacy and wellbeing interventions.

TEACHING AND LEARNING EXPERIENCES

Curriculum development is strong, and Ysgol Y Ddraig has worked effectively with cluster schools to develop the capacity across all the schools. The school is well-prepared for the implementation of the Curriculum for Wales (CfW) in line with national expectations. The school continues to reflect on and refine the school curriculum model using the four purposes as key drivers to inform practice and pupils' learning experiences.

Consideration of the progress made by vulnerable pupils, including those with additional learning needs has been an integral part of the planning for the CfW, ensuring that these pupils will be able to fully access the new curriculum as it becomes embedded. The school has a clear vision for the development of their assessment processes in line with the new curriculum.

The SRB at 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. Ysgol Y Ddraig was delivered within Band A of the 21st Century Schools programme and has created nature areas with ponds, bug hotels and planting as part of their outdoor learning space. 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 ALN of the children attending the SRB means that they all need access to experiential learning and real-life situations to develop their language and vocabulary in a functional way. Being able to provide opportunities to develop language through play is crucial for the children. Play enables children to practise the language skills they have learnt and extend their expanding vocabulary. Interacting with adults and peers also enables children to refine their speech sounds through listening to others.

CARE, SUPPORT AND GUIDANCE

Ysgol Y Ddraig currently does not have an Estyn Report. The Report is due on 20th July 2022, however Llandough Primary School does have an available [Estyn Report](#) from March 2022. The relocated SRB at Ysgol Y Ddraig will benefit from the same staff, resources and school arrangements as Llandough Primary School but within an improved setting. 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 same dedicated team overseeing the SRB.

The relocation of the SRB would improve the learning environment and increase facilities to support wellbeing, and the provision.

LEADERSHIP AND MANAGEMENT

The interim executive headteacher and head of school of Ysgol y Ddraig lead the school very effectively and have skilfully developed a shared vision and strategy to improve outcomes for learners with a strong emphasis on wellbeing of learners and raising standards.

The wider leadership team contributes effectively to school improvement and monitoring activities, and the school continues to maintain a strong focus on leadership development. This focus has improved the school's capacity to manage change very effectively. The roles and responsibilities of leaders and staff are well defined and communicated clearly. Senior leaders have a good track record for improving performance and quality of education. Together, leaders continue to refine and embed effective practices and processes.

Governors, through committees, have a very good understanding of the school's strengths and areas for improvement and effectively hold leaders to account in their role as critical friends. Their work to support and challenge the school's performance is very strong. Governors are developing a clear understanding of the school curriculum reform through regular sessions of professional learning. Governors make a valuable contribution to the school's improvement planning and self-evaluation.

3.3. WELSH LANGUAGE PROVISION

The Council's School Investment Programme reflects 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 Cymraeg 2050 strategy and contributing to its ambitious target of 1 million Welsh speakers by 2050.

Although Ysgol Y Ddraig teaches predominantly through the medium of English, Welsh language is part of the curriculum contributing to the Council's commitment to encouraging bilingual speakers. Ysgol Y Ddraig will continue to seek to improve Welsh language provision through its existing curriculum framework.

3.4. ADDITIONAL LEARNING NEEDS (ALN) PROVISION

There would be a positive impact regarding ALN as the proposal would result in improved provision available for pupils with Speech, Language and Communication Needs, not only for pupils with complex needs from throughout the Vale, but also for pupils from Ysgol y Ddraig who would benefit from the increased on-site expertise.

- A key role of the SRB would be to support the implementation of school-wide policies and procedures to strengthen support available to all pupils at Ysgol Y Ddraig.
- The school has robust and effective processes to track pupils' progress. Senior leaders analyse information well to hold teachers to account through termly progress meetings. There is a very strong focus in place on raising the achievement of all pupils, including vulnerable learners. The school works closely with external agencies to support vulnerable learners. The school has prepared staff well for the changes under the new ALN Act.

3.5. IMPACTS UPON OTHER SCHOOLS

The relocation of ALN provision will result in the loss of the Speech, Language and Communication Needs SRB at Llandough Primary School. However, the relocation of the SRB would provide additional space at Llandough Primary School allowing the school to accommodate the anticipated increase in pupil population arising in the area. It is forecast that 209 pupils will attend Llandough Primary School in 2025 which is near the threshold of the school's capacity of 210 places. The relocation will also support a more equitable distribution of specialist resources across the Vale of Glamorgan.

3.6. ADMISSIONS

PREVIOUS NUMBERS ON ROLL

Table 1: Previous NOR at Ysgol Y Ddraig and Llandough (data from PLASC)

School	Type	Language	Capacity	2019	2020	2021	2022
Ysgol Y Ddraig	Community	EM	420	285	285	275	289
Llandough	Community	EM	210	190	185	190	191

PROJECTED NUMBERS ON ROLL

Table 2: Projected demand at Ysgol Y Ddraig (data from PLASC)

School	Type	Language	Capacity	2022	2023	2024	2025
Ysgol Y Ddraig	Community	EM	420	289	284	279	275
Ysgol Y Ddraig SRB*	Specialist	EM	20	20	20	20	20
Llandough	Community	EM	210	190	201	205	209

**Capacity and demand from Llandough Primary School used as baseline*

ADMISSIONS ARRANGEMENTS

All admission to the SRB at Ysgol Y Ddraig would be via the Local Authority Panel.

3.7. LAND AND BUILDINGS

Ysgol Y Ddraig is an existing school with associated building which was constructed as part of Band A of the 21st Century Schools programme (now known as Sustainable Communities for Learning). An area of the building would be allocated for the SRB unit.

Figure 1: Image of Ysgol Y Ddraig building (outside view)



Ysgol Y Ddraig benefits from suitably sized classrooms, a main hall for sport and dining, offices for headteacher and administration, a staffroom, and break out areas for pupil interventions. The school is fenced to safeguard pupils with intercom access for visitors. Within the grounds, there are external play areas, a multi-use games area (MUGA) and habitat areas to enhance pupil wellbeing.

The SRB would be accommodated within two adjacent classrooms with access to outdoor space. Staff would utilise the existing staff room within Ysgol Y Ddraig to help foster a strong connection between the SRB and Ysgol Y Ddraig improving integration.

The proposed new location would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21st Century
- Unobstructed access between all internal areas for children and staff
- Enhanced safeguarding and site security for pupils and staff
- Improved outdoor sports facilities for ALN pupils
- Specialist provision to provide a curriculum that best meets the needs of learners
- Full access for the whole community with full disabled access to internal and external areas.

3.8. FINANCE

CAPITAL FUNDING

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.

REVENUE FUNDING

The funding for the SRB for 22/23 is £223,525 and 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 £11,488 via the mainstream funding formula which covers additional costs in relation to the pupils within the SRB such as resources.

Transport costs to the SRB at Ysgol Y Ddraig are currently approximately £44,000 per annum including the transportation of staff. The transport costs to Llandough prior to the temporary move were £48,000 per annum. Transport costs can fluctuate considerably depending on the home address of the pupils attending the SRB therefore no saving or increase to transport costs cannot be accurately forecast in the longer term. Pupils can attend for all areas of the Vale of Glamorgan.

3.9. HUMAN RESOURCES

The existing staff would continue to be employed at the new location of Ysgol Y Ddraig. No redundancies would be necessary as part of the relocation or additional staffing requirements.

The SRB unit would be managed centrally by the Directorate of Learning & Skills. The Directorate of Learning & Skills would work collaboratively with the headteacher and governing body of Ysgol Y Ddraig to ensure the SRB is able to operate within the school framework.

The SRB area at Ysgol Y Ddraig will accommodate up to 20 learners. It is proposed that the base is established from January 2023. Staff from the existing SRB at Llandough Primary School would be formally relocated to Ysgol Y Ddraig to support learners within the SRB.

Any proposed future changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

3.10. TRANSPORT AND LEARNER 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.

4. OTHER CONSIDERATIONS

4.1. POTENTIAL BENEFITS OF THIS PROPOSAL COMPARED TO THE STATUS QUO

The Council:

- Continues to provide targeted support for pupils with Speech, Language and Communication Needs within a mainstream primary school environment.
- Provides improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Provides continuity of provision within the Vale of Glamorgan for pupils with Speech, Language and Communication Needs.
- Provides opportunities for professional development throughout Ysgol Y Ddraig.
- Ensures that pupils with Speech, Language and Communication Needs can have their needs met within the local authority and can be supported to remain in their mainstream school.

4.2. POTENTIAL DISADVANTAGES OF THIS PROPOSAL COMPARED TO THE STATUS QUO

- Management of staff and resources may be disrupted during the implementation of the proposal. As the base is already at the proposed site, this would be minimal.
- Pupils maybe further disrupted due to the proposal. It is noted that the SRB has temporarily moved to Ysgol Y Ddraig which would limit any additional disruption if the proposal were approved.
- Some staff and pupils will have further to travel to the relocated base.

4.3. POTENTIAL RISKS OF THIS PROPOSAL AND MEASURES TO MITIGATE IDENTIFIED RISKS

Table 3: Potential risks and mitigation measures

Risk	Mitigation
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<p>Inadequate facilities at Llandough Primary School to provide an SRB in light of pandemic restrictions</p>	<p>The SRB would maintain its existing capacity of 20 pupils. The aim of the SRB is to support learners with Speech, Language and Communication Needs. The new location of the SRB would be able to provide an improved learning environment to the existing location. The facilities available at Ysgol Y Ddraig are appropriate for 21st century learning and allow for adequate space to comply with potential future pandemic restrictions ensuring continuity of learning.</p>
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4.4. EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment will be carried out as part of the consultation process.

An Equality Impact Assessment (EIA) is a process that looks at a policy or scheme to make sure it does not discriminate against anyone based on the protected characteristics set out in the Equality Act 2010 (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion/belief, sex, sexual orientation).

The assessment will be reviewed after the consultation and at key points if the proposal proceeds.

4.5. COMMUNITY IMPACT ASSESSMENT

A Community Impact Assessment has been undertaken to determine any impacts this proposal would have on the local community.

The impact assessment identified that the proposal would likely have a neutral impact on the local community across 8 of the 8 measures assessed.

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.

It is concluded from the Community Impact Assessment that the proposal would have a neutral impact upon the local community.

The full Community Impact Assessment can be viewed via the following link:

<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Consultation-on-SRB-re-location-to-Ysgol-Y-Ddraig.aspx>

4.6. CONTRIBUTIONS TO THE WELLBEING OF FUTURE GENERATIONS

[The Wellbeing of Future Generations \(Wales\) Act 2015](#) requires the Council to think about the long-term impact of their decisions, to work better with people, communities, and each other and to prevent persistent problems such as poverty, health inequalities and climate change.

To make sure we are all working towards the same purpose, the Act puts in place seven Wellbeing goals and five ways-of-working which must inform the decision-making processes of public bodies.

The proposal has been appraised in terms of how it contributes to delivering upon the aspirations of the Act, the Wellbeing goals, and the ways-of-working. This is does not form part of the statutory consultation process but was considered beneficial to meeting the spirit of the Act.

4.7. ALTERNATIVES CONSIDERED

OPTION 1: DO NOT RELOCATE THE SRB AND CONTINUE TO PROVIDE SPECIALIST EDUCATION FROM LLANDOUGH PRIMARY SCHOOL.

Why was this option discounted?

The Local Authority has looked at options around how to accommodate the Speech and Language and Communication Resource Base at Llandough Primary School.

Plans were drawn up by the Council's Buildings Services team which would provide an appropriate space for the Resource Base going forward in Llandough Primary School. This plan requires extensive re-modelling to a ground floor section of the school. The cost of this re-modelling was estimated to be a minimum of £50k and while this would provide a functional space, it would not provide the same standard of accommodation as that available at Ysgol y Ddraig which is a relatively new building.

OPTION 2: ESTABLISH AN SRB AT ANOTHER SCHOOL WITHIN THE VALE OF GLAMORGAN.

Why was this option discounted?

Other potential schools were reviewed. However, these schools either did not have the available space to accommodate the SRB, were in a similar condition to Llandough Primary School or would have required extensive capital cost to provide the SRB on site. Consequently it was considered Ysgol Y Ddraig represented the most cost effective option which provided improved facilities and an enhanced learning environment.

5. THE STATUTORY CONSULTATION PROCESS

Table 4: Outline of the statutory consultation process

Steps	Description
Step 1: Develop a proposal	An initial proposal will be developed and considered by the Council's Cabinet. Section 2 of the School Organisation Code outlines when the statutory procedure is required.
Step 2: Cabinet consideration	The Council's Cabinet to consider the proposal and approval to consult.
Step 3: Consultation	<p>A consultation document must be published on the Council website. The consultation document must be published on a school day and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days. Stakeholders identified in section 3.4 of the School Organisation Code (2018) must be notified by letter/email.</p> <p>The consultation period for this proposal starts on 13th July 2022 and ends on 22nd September 2022. See page 25 for further details of how to respond and make your views known.</p> <p>Within 13 weeks of 22nd September 2022 a consultation report will be published on the Council's and website. Hard copies of the report will also be available on request. The report will summarise the issues raised by consultees during the consultation period and responses to these issues. The report will also contain Estyn's view of the proposals.</p> <p>In November 2022 Cabinet will consider the consultation report and decide whether or not to progress to the next stage. If the Council decides to continue with the proposal, it must publish a statutory notice.</p>
Step 4: Consultation response report	Feedback submitted during the consultation period will be considered and a response report will be developed and presented to Cabinet for consideration.
Step 5: Cabinet consideration	Cabinet will consider the consultation response report and determine whether to publish the report and to approve the publication of the proposal in the form of a statutory notice.

Step 6: Statutory notice	<p>The statutory notice must be published on a school day and as outlined in section 4.1 of the School Organisation Code (2018).</p> <p>The statutory notice would be published on the Vale of Glamorgan Council website and posted at or near the main entrance to Cowbridge Comprehensive School. Copies of the notice would be distributed to pupils, parents, guardians, and staff members. The school may also distribute the notice by email. The notice would set out the details of the proposals and invite anyone who wishes to object to do so in writing within the specified period.</p>
Step 7: Objection period	<p>Anyone wishing to make objections to a proposal has the opportunity to do so. Objections must be made in writing or by email and sent to the proposer before the end of 28 days beginning with the day on which the notice was published.</p>
Step 8: Objection report	<p>Under section 49 of the School Standards and Organisation (Wales) Act 2013 when objections have been received proposers must publish a summary of the statutory objections and the proposer’s response to those objections (“the Objection Report”).</p>
Step 9: Cabinet consideration	<p>Cabinet considers the objection report for final determination on the proposal.</p> <p>The Council would determine the proposal. Cabinet may decide to approve, reject, or approve the proposals with modifications. In doing so, the Council would consider any statutory objections that it has received.</p>
Step 10: Decision letter	<p>Confirmation of the decision and objection report availability will be issued to stakeholders.</p> <p>Following determination of proposals all interested parties would be informed of the decision which will be published electronically on the Vale of Glamorgan Council’s website.</p>

5.1. KEY DATES

Feedback from this education consultation will be collated and summarised and a report presented to Cabinet. The consultation report will be available for everybody to view on the Council’s website. Copies can also be obtained on request by using the contact details within this document.

There are further stages that the Council will have to go through before a final decision is made. These stages are set out below:

Table 5: Key dates of the process

Statutory Process	Timescale
Issue consultation document	13th July
Closing date for views on the proposals	22nd September
Consultation report considered by Cabinet and published on the school and Council's website	3rd November 2022
Subject to Cabinet approval, Statutory notice issued during which time formal written objections will be invited	14th November 2022
End of Statutory Notice Period	13th December 2022
Determination by Cabinet with objection report.	January 2023
Decision notification	January 2023
Proposal implemented	January 2023

The proposed timetable may be subject to change.

6. FREQUENTLY ASKED QUESTIONS (FAQS)

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 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 3 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.

Any further Frequently Asked Questions posed during the consultation will be added to the consultation webpage.

7. INVOLVING STAKEHOLDERS AND RESPONDING TO THE CONSULTATION

Our consultation process follows Welsh Government guidelines outlined in the School Organisation Code (2018). A range of individuals and groups are being asked for their views about these proposals.

Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known to enable Cabinet to consider these views as part of the decision-making process.

The Council is consulting with the following groups:

Table 6: List of groups to consult 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

7.1. INVOLVING CHILDREN IN THE CONSULTATION

It is important that when bringing forward proposals, Councils must make suitable arrangements to consult with pupils and, where possible, those pupils likely to attend the school. The Council firmly believes that the pupils of Ysgol Y Ddraig and Llandough Primary School should be given the opportunity to make their views known about this proposal.

It is intended that a consultation workshop will be held with pupils at Ysgol Y Ddraig and Llandough Primary School to gather their views about the proposal. The information gathered at these sessions will be included in the final consultation report. The full report will be submitted to Cabinet for consideration following the consultation period.

7.2. HOW YOU CAN FIND OUT MORE AND GIVE YOUR VIEWS

FIND OUT MORE

This document and further supporting information can be found on the Vale of Glamorgan's [School Consultations](#) page.

Any updates can also be found on social media through the Vale of Glamorgan Council Twitter feed and via the Vale of Glamorgan Council Facebook page.

You can also contact us on **01446 709828** or sustainablecommunitiesforlearning@valeofglamorgan.gov.uk for further information on the proposal.

GIVE YOUR VIEWS

The consultation period will run from **13th July to 22nd September 2022**. You can respond to our proposals at any time during this period. Your views are important to us, and there are a number of ways that you can let us know.

You can:

- Complete the online response form at:
<https://forms.office.com/r/m3AeNtaS1p>

Or

- Complete the consultation response form at the end of this document and send to:
Transfer Specialist Resource Base to Ysgol Y Ddraig
The Vale of Glamorgan Council

Civic Offices

Holton Road

Barry

CF63 4RU

Please note that all comments submitted in writing should contain the full name and postcode of the person making the comments.

The closing date for responses to this consultation is 22nd September 2022. Unfortunately, responses received after this date will not be considered by the Council.

All responses given to us will be considered by Cabinet before it decides whether or not to publish a statutory notice about the proposals.

Responses received from consultees who are opposed to these proposals, although considered as part of the consultation report, will not be treated as statutory objections. A statutory objection would form part of the statutory notice period if it were approved at the next stage by the Council's Cabinet. If you wish to object to the notice at the next stage of the process, should it proceed, you will need to do so in writing during the statutory objection period. These key dates are outlined under [Section 5](#).

8. CONSULTATION RESPONSE FORM

Your views matter. Please tell us what you think about the proposal by:

- **completing the online response** form at:

<https://forms.office.com/r/m3AeNtaS1p>

or

- answering the consultation questions and **adding your points of view on this form**

Please return the form to the postal address:

Transfer Specialist Resource Base to Ysgol Y Ddraig

Corporate and Customer Services

The Vale of Glamorgan Council

Civic Offices,

Holton Road

Barry CF63 4RU

**The closing date for responses to this consultation is 22nd September 2022.
Unfortunately, no responses received after this date can be considered.**

Consultation responses will not be counted as objections to the proposals, although considered by the Council when making its decision. Objections can only be registered following publication of a statutory notice.

Please note that all comments should contain the full name and postcode of the person making the comments.

Any responses received can be requested under the Freedom of Information Act and may have to be made public. However, any information that would identify an individual such as name, email address and postal address would be removed.

Your Full Name:	
Postcode:	

Please tell us whether you are responding as (tick all which apply):					
Parent or Guardian*	<input type="checkbox"/>	Grandparent*	<input type="checkbox"/>	Pupil*	<input type="checkbox"/>
Member of Staff*	<input type="checkbox"/>	Governor*	<input type="checkbox"/>	Local Resident	<input type="checkbox"/>
Other (please specify)					

*Please confirm which school/s you are affiliated with:	
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1. Do you support the proposal to relocate specialist education by establishing a specialist resource base at Ysgol Y Ddraig from January 2023?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	No opinion either way	<input type="checkbox"/>
Please explain why:					

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

3. Any other comments?

Thank you for your comments.

Please return this form to the Vale of Glamorgan Council by no later than **22nd September 2022.**

If you wish to be notified of publication of the consultation report via email or post, please provide the relevant details below:

I wish to be notified via: (please delete as appropriate)	Email / Post
Email address:	
Postal address:	

A large, empty rectangular box with a thin black border, intended for taking notes.

9. VALE OF GLAMORGAN EQUALITY MONITORING FORM

Gender and Gender Identity				
What is your gender?	<input type="checkbox"/> Female <input type="checkbox"/> Male			
At birth were you described as?	<input type="checkbox"/> Female <input type="checkbox"/> Male <input type="checkbox"/> Intersex <input type="checkbox"/> Prefer not to say			
Disability				
Are your day-to-day activities limited because of a physical or mental health condition, illness or disability which has lasted, or is expected to last, 12 months or more?	<input type="checkbox"/> Yes – limited a lot <input type="checkbox"/> Yes – limited a little <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say			
Age				
What is your date of birth?				
National Identity				
National Identity – how would you describe your national identity?				
<input type="checkbox"/> Welsh	<input type="checkbox"/> English	<input type="checkbox"/> Scottish	<input type="checkbox"/> Northern Irish	<input type="checkbox"/> British
<input type="checkbox"/> Other (please specify)		<input type="checkbox"/> Prefer not to say		
Ethnic Group				
Ethnicity – how would you describe your ethnic group?				
White				

<input type="checkbox"/> Welsh/English/Scottish/Northern Irish/British		<input type="checkbox"/> Irish	
<input type="checkbox"/> Gypsy or Irish Traveller		<input type="checkbox"/> Any other white background (please specify):	
Mixed/multiple ethnic groups			
<input type="checkbox"/> White and Black Caribbean		<input type="checkbox"/> White and Black African	
<input type="checkbox"/> White and Asian			
<input type="checkbox"/> Any other mixed/multiple ethnic background (please specify):			
Asian/Asian British			
<input type="checkbox"/> Indian		<input type="checkbox"/> Pakistani	
<input type="checkbox"/> Bangladeshi		<input type="checkbox"/> Chinese	
<input type="checkbox"/> Any other Asian background (please specify):			
Black/African/Caribbean/Black British			
<input type="checkbox"/> African		<input type="checkbox"/> Caribbean	
<input type="checkbox"/> Any other Black/African/Caribbean background (please specify):			
Other ethnic group			
<input type="checkbox"/> Arab			
<input type="checkbox"/> Any other ethnic group (please specify):			
<input type="checkbox"/> Prefer not to say			

Welsh Language

Please describe your Welsh language ability by ticking the relevant box(es) below.

	Understand	Speak	Read	Write
None	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Basic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Good	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fluent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Identity				
Which of the following options best describes how you think of yourself?				
<input type="checkbox"/> Heterosexual / straight	<input type="checkbox"/> Gay or lesbian		<input type="checkbox"/> Bisexual	
<input type="checkbox"/> Other	<input type="checkbox"/> Prefer not to say			
Religion				
What is your religion?				
<input type="checkbox"/> No religion	<input type="checkbox"/> Christian (all denominations)		<input type="checkbox"/> Buddhist	
<input type="checkbox"/> Hindu	<input type="checkbox"/> Jewish	<input type="checkbox"/> Muslim	<input type="checkbox"/> Sikh	
<input type="checkbox"/> Any other religion (please specify):			<input type="checkbox"/> Prefer not to say	
Pregnancy and Maternity				
Are you currently pregnant or have you been pregnant within the last year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say			
Have you taken maternity leave within the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Prefer not to say			
Marriage and Civil Partnership				
What is your legal marital or same sex civil partnership status?	<input type="checkbox"/> Single, that is never married and never registered in a same sex civil partnership <input type="checkbox"/> Married and living with husband/wife <input type="checkbox"/> Separated but still legally married <input type="checkbox"/> Divorced			

	<ul style="list-style-type: none"><input type="checkbox"/> Widowed<input type="checkbox"/> In a registered same-sex civil partnership and living with your partner<input type="checkbox"/> Separated, but still legally in a same-sex civil partnership<input type="checkbox"/> Formerly in a same-sex civil partnership which is now legally dissolved<input type="checkbox"/> Surviving partner from a same-sex civil partnership<input type="checkbox"/> Prefer not to say
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DIRECTORATE OF LEARNING AND SKILLS COMMUNITY IMPACT ASSESSMENT

**CONSULTATION ON THE PROPOSAL TO
TRANSFER SPECIALIST RESOURCE BASE
AT LLANDOUGH PRIMARY TO YSGOL Y
DDRAIG FROM JANUARY 2023.**



This document can be made available in Braille. Information can also be made available in other community languages if needed. Please contact us on 01446 709828 to arrange this.

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INTRODUCTION

The Vale of Glamorgan Council is committed to ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. In order to achieve this ambition it is essential that we ensure schools remain sustainable, reflect the needs of our local communities, and are equipped with the best possible learning environments.

The Council is committed to ensuring that consultations are meaningful, relevant and appropriate for the communities that are involved, and the Council has a duty of care to ensure that proposals are clear, transparent, and reflective of those affected. This is a vision that can only be realised by working in partnership with schools, governors, parents and the wider communities we all serve.

This proposal is to relocate the specialist resource base at Llandough Primary School to Ysgol Y Ddraig from January 2023.

This proposal is considered under section 2.3 of the School Organisation Code (2018). Section 2.3 of the School Organisation Code refers to Regulated Alterations of a school, which includes the transfer of any school to a new site.

NATIONAL CONTEXT

The key statutory guidance for local authorities in developing statutory proposals for changes for school organisation is in accordance with section 42 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. When considering proposals the Council must consider the impact on the local community, particularly in rural areas and in areas designated for communities' first programmes or successor programmes.

LOCAL POLICY CONTEXT

Echoing national policy outlined in the Well-Being of Future Generations (Wales) Act 2015, the Council has committed as part of the Corporate Plan 2020-25 to achieving a vision of – **'Working together for a brighter future'**.

The Vale of Glamorgan is committed to achieving the objective of 'supporting learning, employment and sustainable economic growth' raising overall standards of achievement by modernising education in the Vale to ensure children and young people receive a first-class education.

We believe that in order to achieve this it is important that we support teaching and learning outcomes by providing modern and fit for purpose buildings that meet the needs of modern-day education. Schools need to be able to provide the best possible learning experience to make sure that children and young people have the best opportunities available to them and that they are able to reach their full potential.

CURRENT CHALLENGES

The proposal 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.
- Provides continuity of provision within the Vale for pupils with Speech, Language and Communication Needs.
- Provide opportunities for professional development throughout Ysgol Y Ddraig.
- Reduced reliance on costly out of county provision.

COMMUNITY PROFILE

There are currently 5 schools which serve the area surrounding Ysgol Y Ddraig in Llantwit Major:

School name	Type	Language	Age range	Capacity*	Nursery places (part-time)	Distance from Ysgol Y Ddraig (miles)
St Illtyd	Community	EM	3-11	379	76	0.5
Wick and Marcross CiW Primary School	Denominational	EM	3-11	154	24	3.9
St Helen's R.C Primary School	Denominational	EM	3-11	308	48	8.8
Ysgol Gymraeg Dewi Sant	Community	WM	3-11	210	56	0.2
Llantwit Major High School	Community	EM	3-16	1,050		0.1

Ysgol Y Ddraig is located within the ward Llantwit Major which is made up of 7 lower super output areas (LSOAs). Ysgol Y Ddraig is located in Llantwit Major 2 and is surrounded by the LSOAs Llantwit Major 1, 3, 4, 5, 6 and 7. Llantwit Major 2 is the central area of Llantwit Major and includes the district centre, school site and residential areas of Llantwit Major in the Vale of Glamorgan, in south Wales. The other Llantwit Major areas make up the remaining parts of the town, with the exception of ward areas 3 and 5 which relate to the rural outskirts of the area.

The Llantwit Major ward has a population of 10,966 based upon the 2020 mid-year estimates. Llantwit Major 2 has a population of 1,564 (Office of National Statistics, 2019).

The data below for the Llantwit Major ward surrounding Ysgol Y Ddraig is from the [Welsh Index of Multiple Deprivation \(WIMD\)](#).

Vale of Glamorgan Constituency Area	LSOA Code	Overall Wales Rank (of 1909)		Employment Rank (of 1909)		Access to Services Rank (of 1909)	
		Rank	% (Least / Most Deprived)	Rank	% (LD / MD)	Rank	% (LD / MD)
Llantwit Major 1	W01001106	1822	50% least deprived	1747	50% least deprived	1863	50% least deprived
Llantwit Major 2	W01001107	1655	50% least deprived	1373	50% least deprived	1732	50% least deprived
Llantwit Major 3	W01001108	1429	50% least deprived	1244	50% least deprived	631	30% - 50% most deprived
Llantwit Major 4	W01001109	1363	50% least deprived	1188	50% least deprived	802	30% - 50% most deprived
Llantwit Major 5	W01001110	1686	50% least deprived	1844	50% least deprived	453	20% - 30% most deprived
Llantwit Major 6	W01001111	815	30% – 50% most deprived	694	30% - 50% most deprived	807	30-50% most deprived
Llantwit Major 7	W01001112	1873	50% least deprived	1805	50% least deprived	1520	50% least deprived

As the table above shows, the wards surrounding Ysgol Y Ddraig are mixed in terms of levels of deprivation. The LSOA area the school is located in is one of the least deprived areas across the 3 measures. Areas 3 and 4 have been identified as being in the 30% - 50% most deprived and Area 5 is identified as 20% - 30% most deprived in terms of access to services. This is reflective of the more rural location of these areas where services will generally be more difficult to access. Area 6 has been identified as being 30% – 50% most deprived across all measures. The remaining areas share the same profile to Area 2.

ADDITIONAL LEARNING NEEDS

There is currently a temporary arrangement in place allowing the SRB for Speech, Language and Communication Needs to operate out of Ysgol Y Ddraig following the assessment of the Llandough Primary School SRB under Covid 19 regulations.

It is considered there would be a positive impact regarding ALN as the proposal would result in improved provision available for pupils with Speech, Language and Communication Needs due to the improvement to the physical environment at Ysgol Y Ddraig which has been developed under the Sustainable Communities for Learning Programme. The proposal would support pupils to access mainstream education with additional support. This would particularly benefit those pupils who would not normally meet the criteria to attend YYD.

- A key role of the SRB would be to support the implementation of school-wide policies and procedures to strengthen support available to all pupils at Ysgol Y Ddraig.

IMPACT ASSESSMENT

This section of the Community Impact Assessment assesses the potential impact this proposal could have on the local community. The information analysed in this process represents a snapshot of the current situation. The impact assessment is an evolving document that will continue to be developed throughout the statutory process. Feedback received during the consultation period will be used to further inform the Community Impact Assessment, which will be presented to Cabinet as part of the Consultation Report.

Eight key measures have been identified:

Ref.	Measure
CI1	Children living in the catchment are attending their local school
CI2	Services provided by the school for the local community, including extra-curricular activities
CI3	Community facilities used regularly by the school

CI4	Community facilities provided by and activity undertaken within the school premises
CI5	Impact on local businesses
CI6	Impact on local employment
CI7	Impact on local infrastructure
CI8	Transport arrangements

The eight measures were assessed to identify any negative or positive impacts on the local community, and a score was applied ranging from -3 to +3 based on the balance of the evidence available.

Measure Score	Measure Assessment
-3	Large deterioration
-2	Moderate deterioration
-1	Slight deterioration
0	No overall change
1	Slight Improvement
2	Moderate Improvement
3	Large Improvement

IMPACTS UPON THE LOCAL COMMUNITY

Ref.	Measure	Score	Impact of Proposal
CI1	Children living in the catchment are attending their local school	0	<p>Placing the specialist resource base within a mainstream primary school, provides additional support for pupils Speech, Language and Communication Needs whilst ensuring they can access mainstream primary education.</p> <p>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.</p> <p>The relocation of the SRB would provide additional space at Llandough Primary School allowing the school to accommodate the anticipated increase in pupil population arising in the area. It is expected 209 pupils would attend Llandough Primary School in 2025 which is near the threshold of the school's capacity of 210 places.</p>
CI2	Services provided by the school for the local community, including extra-curricular activities	0	<p>It is proposed that any community services currently provided by Llandough Primary School and Ysgol Y Ddraig would continue and that there would be no loss of provision.</p>
CI3	Community facilities used regularly by the school	0	<p>There would be no loss of access for Llandough Primary School and Ysgol Y Ddraig to community facilities as a result of this proposal.</p>

CI4	Community facilities provided by and activity undertaken within the school premises	0	The proposal will not change the current community facilities provided by either school.
CI5	Impact on local businesses	0	There would be no impacts upon local businesses as a result of this proposal concerning Ysgol Y Ddraig and Llandough Primary School.
CI6	Impact on local employment	0	The existing staff at Llandough Primary School SRB would be transferred to Ysgol Y Ddraig School.
CI7	Impact on local infrastructure	0	<p>The proposal would not result in an increase in capacity at Ysgol y Ddraig which would cause increased pressure on local infrastructure. Instead the proposal will adapt to existing vacant classrooms within the school building.</p> <p>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 and staff where appropriate. This would help to alleviate pressures on local infrastructure.</p>
CI8	Transport arrangements	0	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'.

		<p>Mainstream primary aged pupils are provided with free school transport if they live 3 miles or further from their nearest suitable school.</p> <p>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.</p>
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SCORING SUMMARY

Ref.	Local Community
CI1	0
CI2	0
CI3	0
CI4	0
CI5	0
CI6	0
CI7	0
CI8	0
Average Score	0

CONCLUSIONS

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.

It is concluded from the Community Impact Assessment that the proposal would have a neutral impact upon the local community.



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.



This document can be made available in Braille. Information can also be made available in other community languages if needed. Please contact us on 01446 709828 to arrange this.

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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 E.

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

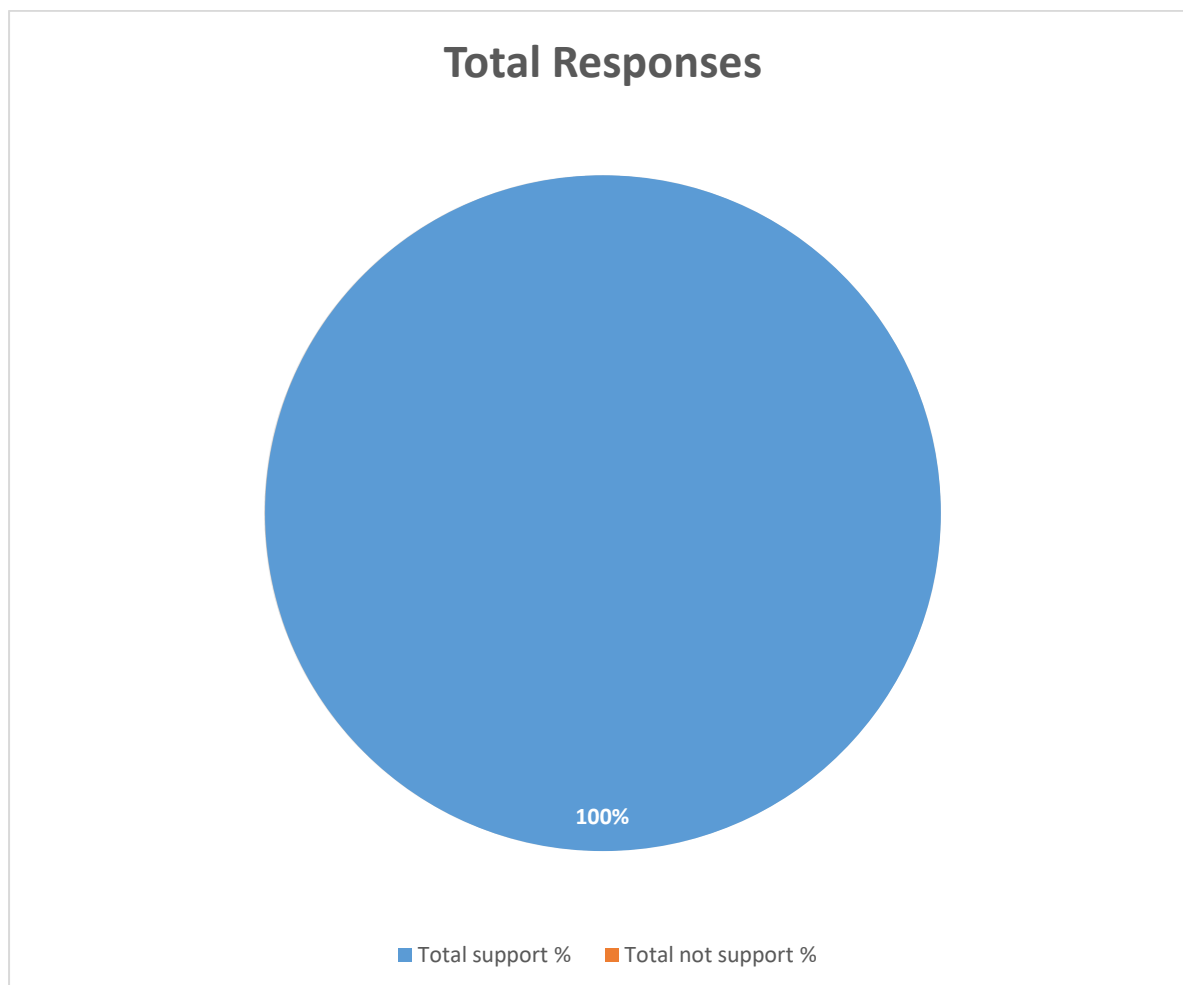
As Table 3 and Chart 1 below show, most responses (25%) were **not** in favour of the Proposal.

Table 3: Breakdown of consultation responses

Total (individual) responses:	Total support	Total not support

No.	No.	%	No.	%
4	1	100%	0	0%

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



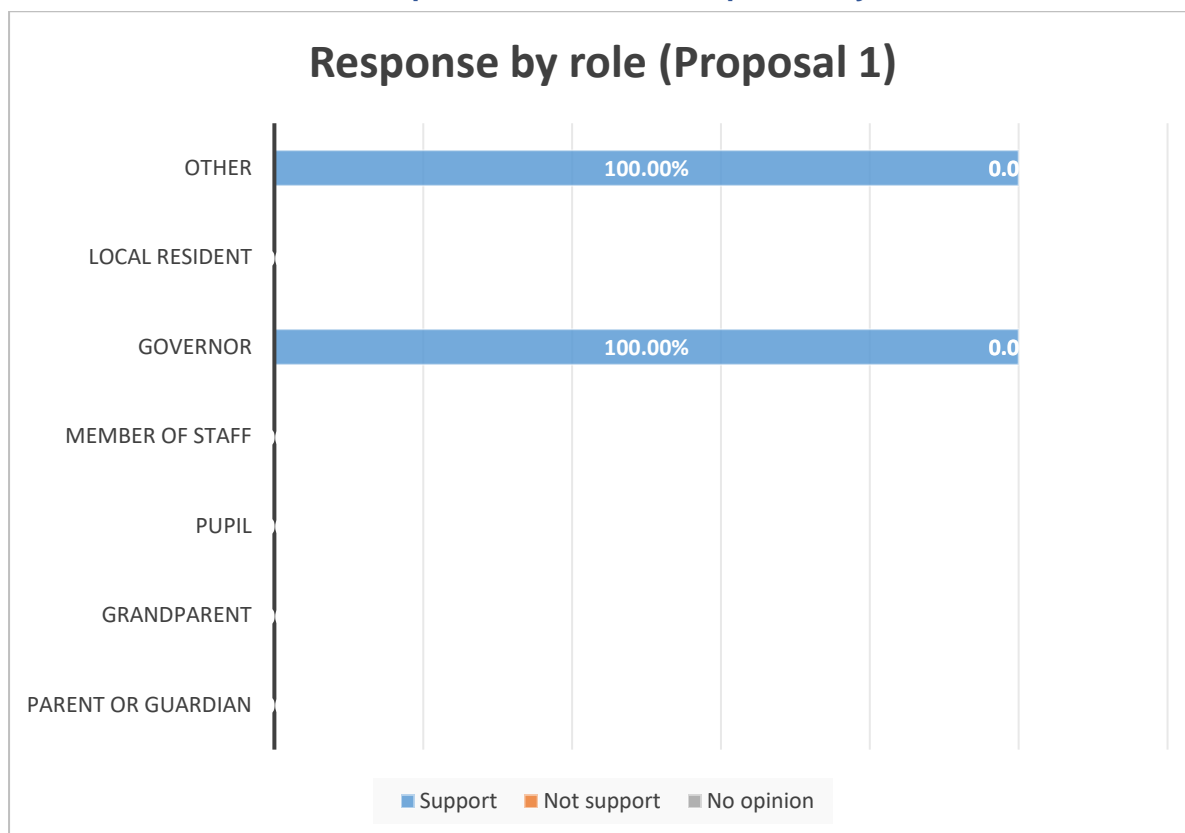
As Table 4 and Chart 2 below show the majority of the largest group of respondents (Other) were **for** the Proposal. 1 respondent identified as a Governor and also **for** the proposal.

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 the inspection report for this school was not published, however, the report was published in May 2022 whereas 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 XX.

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 Governing Body.

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 14 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	2.3	3	25	30
2	6.9	8	18	22
3	30.9	37	9	11
4	22.4	27	3	3
5	4.0	5	26	31
6	0.6	1	24	29
7	0.6	1	24	29
8	2.3	3	25	30
9	6.9	8	18	22
10	0.5	1	24	29
11	2.6	3	22	26
12	6.8	8	20	23
13	23.7	28	9	10
14	6.6	8	17	21
Average	8.4	10	19	23

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/mainstream-schools-funding-formula-2022-23-english)

THEME 4

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

The SRB staff are trained in Speech, Language and Communication Needs for 3 -11 year olds. There are a number of courses available to staff, however, the Elklan Courses are promoted. This course is accredited through the Open College Network for both level 2 and 3. The training enables staff to be more effective in their support of children with speech, language and communication need. Many of the strategies and skills learnt on the courses are applicable to mainstream children too, encouraging more effective speaking, listening and group interaction skills.

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 Governing Body.

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 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 3 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 E - 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.

1. What are you assessing?

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

2. Who is responsible?

Name	Nathan Slater	Job Title	Project Manager
Team	Sustainable Communities for Learning	Directorate	Learning & Skills

3. When is the assessment being carried out?

Date of start of assessment	23 September 2022
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4. Describe the proposal?

What is the purpose of the proposal?

In July 2022, the Council launched a new consultation aimed at relocating the Special Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig. The aim of the consultation was to inform the community about the school proposal being put forward to relocate the SRB to Ysgol Y Ddraig from January 2023, and to seek feedback on this proposal.

The feedback and views expressed in the consultation are being considered together in the publication of a consultation report on the proposal and this Equality Impact Assessment.

The proposal being put forward is to 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. Existing SRB Staff and pupils would be accommodated in the new location at Ysgol Y Ddraig.

Why do you need to put it in place?

The SRB provision at Llandough Primary School was moved to Ysgol Y Ddraig during the Covid-19 pandemic. The space at Llandough was considered to be too small for social distancing with insufficient ventilation to prevent the spread of the disease. Pupils from the resource base also shared toilets with year 1 pupils from the mainstream school which added to the risk of increased infection as pupils were not able to be contained in “bubbles” which were operating at this time.

The Council reviewed the SRB at Llandough Primary School to explore if any measures could be taken to make the space useable under Covid regulations. Though ventilation could be improved, and the social distancing eased by rotating pupils in and out of the SRB, this would not have been sufficient to meet the guidance at the time. Additionally, the use of toilets by more than one class was seen as an infection risk and this risk could not be mitigated. A number of options were considered which would keep all pupils and staff safe in both the SRB and school, whilst allowing access to the specialist provision. However, no solutions were found to ensure that all the pupils could access learning safely.

As a consequence, the Council investigated alternative options to deliver the provision from an alternative school site which had the space that would allow social distancing, good ventilation, and safe use of pupil toilets. This space was found at Ysgol Y Ddraig Primary School in Llantwit Major. Two full time classrooms with break out space, separate outside space, and separate toilets were accessed. The base could also be entered through a separate entrance. Thus, the base was self-contained, ensuring that pupils and staff were safe and compliant with Covid regulations.

The agreed arrangement was temporary and reviewed regularly, with the intention that the base would return to Llandough Primary School when Covid restrictions eased. It is only very recently that Covid restrictions have eased sufficiently to consider a return to Llandough Primary School. However, despite the easing of restrictions it is still evident that the accommodation available at Llandough Primary School is no longer fit for purpose and is not comparable with that available at Ysgol y Ddraig.

Local authority officers have surveyed the accommodation at Llandough and concluded that extensive re-modelling of the ground floor section of the school would be required in order to provide a functional space for the provision going forward. This re-modelling would cause significant disruption to the wider school and would also require additional funding to complete the works required. This is estimated as being a minimum of £50,000. In addition, because of the limitations of what is a relatively old building on a limited site, it would be impossible for any re-modelling to create the same standard of environment as can be offered at Ysgol y Ddraig which is a newly built facility with all the benefits of a 21st century school.

As a result of the success of the temporary relocation and the availability of improved facilities at Ysgol Y Ddraig, it is therefore considered that the SRB would benefit from a permanent relocation to Ysgol Y Ddraig. This would allow the SRB to continue to benefit

from the facilities available at the school and allow this group of children access to the best possible specialist provision for Speech, Language and Communication Needs.

Do we need to commit significant resources to it (such as money or staff time)?

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.

What are the intended outcomes of the proposal?

The Council aims to:

- Continues to provide targeted support for pupils with Speech, Language and Communication Needs within a mainstream primary school environment.
- Provides improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Provides continuity of provision within the Vale of Glamorgan for pupils with Speech, Language and Communication Needs.
- Provides opportunities for professional development throughout Ysgol Y Ddraig.
- Ensures that pupils with Speech, Language and Communication Needs can have their needs met within the local authority and can be supported to remain in their mainstream school.

Who does the proposal affect?

All staff, pupils, parents of pupils attending the SRB and governors at Ysgol Y Ddraig.

Will the proposal affect how other organisations work?

The relocation of ALN provision will result in the loss of the Speech, Language and Communication Needs SRB at Llandough Primary School. However, the relocation of the SRB would provide additional space at Llandough Primary School allowing the school to accommodate the anticipated increase in pupil population arising in the area. It is forecast that 209 pupils will attend Llandough Primary School in 2025 which is near the threshold of the school's capacity of 210 places. The relocation will also support a more equitable distribution of specialist resources across the Vale of Glamorgan.

Will the proposal affect how you deliver services?

There would be a positive impact regarding ALN as the proposal would result in improved provision available for pupils with Speech, Language and Communication Needs, not only for pupils with complex needs from throughout the Vale, but also for pupils from Ysgol y Ddraig who would benefit from the increased on-site expertise.

- A key role of the SRB would be to support the implementation of school-wide policies and procedures to strengthen support available to all pupils at Ysgol Y Ddraig.
- The school has robust and effective processes to track pupils' progress. Senior leaders analyse information well to hold teachers to account through termly progress meetings. There is a very strong focus in place on raising the achievement of all pupils, including vulnerable learners. The school works closely with external agencies to support vulnerable learners. The school has prepared staff well for the changes under the new ALN Act.

Will the proposal impact on other policies or practices?

No, the change only relates to the location. The existing policies and practices relating to the SRB would be retained.

Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?

Our formal consultation process follows Welsh Government guidelines outlined in the School Organisation Code 2018. A range of individuals and groups were asked for their views about these proposals during the period 1 February to 15 March 2022. All responses received as part of the consultation are reflected in the Consultation Report.

Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known.

The Council consulted with the following groups:

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

How will you achieve the proposed changes?

The consultation period for the proposal started on 13 July 2022 and ended on 22 September 2022.

Within 13 weeks of 22 September 2022 a consultation report will be published on the Council's website. Hard copies of the report will also be available from the school office on request. The report will summarise the issues raised by consultees during the consultation period and responses to these issues. The report will also contain Estyn's view of the proposals. In November 2022, the Council will consider the consultation report and decide whether or not to proceed with the proposals.

If the Council decides to continue with the proposals it must publish a statutory notice.

The Council's proposal would formalise the relocation of the SRB from January 2023.

Who will deliver the proposal?

The Council's Additional Learning Needs and Wellbeing Department will be responsible for delivering the proposal.

How will you know whether you have achieved the proposal's purpose?

The Council would have determined the proposal to:

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

The Council may decide to approve, reject, or approve the proposals with modifications. In doing so, the Council will take into account any statutory objections that it has received.

5. What evidence are you using?

Engagement (with internal and external stakeholders)

The consultation process followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The timescales for consultation comply with the School Organisation Code and allowed 7 weeks for consultees to consider and prepare a response. A number of themes received in as part of the process will be addressed and contained within a consultation report to be reported to Council on the proposal. The Council has a statutory duty to publish a consultation report on the proposal.

The Council offered drop in sessions for staff, parents and community stakeholders to attend as part of the process.

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

- 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 with Yes, No or No opinion either way. Consultees were also offered the opportunity to comment further.

As the table below shows, all responses were in favour of the Proposal.

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

Respondents were provided with the option of answering equality monitoring questions. Respondents did not have to answer as the questions were optional and a prefer not to say option was provided. Results are summarised in the table below.

What is your gender?							
Male	1	Female	1	Non-binary	N/A	Prefer not to say	1
How old are you?*							
25-34		35-44	2	45-54		Prefer not to say	1
Are your day-to-day activities limited because of a physical or mental health condition, illness or disability?							
Yes – limited a lot	1	Yes – limited a bit		No	1	Prefer not to say	1
How would you describe your national identity?							
Welsh		English	1	Scottish		Northern Irish	
Other		Prefer not to say	1	British	1		
How would you describe your ethnic group?*							
White	2	Mixed		Asian		Black	
Other Ethnic Group		Prefer not to say	1				
Please describe your Welsh language ability by ticking the relevant box(es) below.							
Understand	1 Good 2 None	Speak	1 Good 2 None	Read	1 Competent 2 None	Write	1 Competent 2 None
Which of the following options best describes how you think of yourself?*							
Heterosexual / straight	1	Gay or lesbian	1	Bisexual or pansexual		Prefer not to say	1
What is your legal marital status?*							
Single		Married	1	registered same-sex civil partnership and living with your partner	1	Prefer not to say	1
Are you currently pregnant or have you been pregnant within the last year?							
Yes		No	2	Prefer not to say		1	
Have you taken maternity leave within the past year?							
Yes		No	2	Prefer not to say		1	

*table just displays options with responses, further options were available to select.

Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The timescales for consultation comply with the School Organisation Code and allowed 10 weeks for consultees to consider and prepare a response.

A number of themes received in as part of the process will be addressed and contained within a consultation report to be reported to Cabinet on the proposal. The Council has a statutory duty to publish a consultation report on the proposal.

The consultation processes gave a range of consultees and local people the opportunity to learn about the proposal and for the Council to hear the views of all those with an interest so that they can be taken into account before any decisions are made. The number of respondents and characteristics thereof are detailed in the consultation response report.

Consultation (with internal and external stakeholders)

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and published on the school's and Vale of Glamorgan Council's websites on the 13 July 2022.

The bilingual consultation documents were published on 13 July 2022 and distributed online; through social media, and on the Vale of Glamorgan Council's website. Consultees were provided with an electronic copy of the documents and a link to the Vale of Glamorgan Council website. Hard copies were available at the school and also at all of the consultation events.

Consultees for the consultations were asked for their opinion on a key question:

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

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?

The consultation processes gave a range of consultees and local people the opportunity to learn about the proposal and for the Council to hear the views of all those with an interest so that they can be taken into account before any decisions are made. The

number of respondents and characteristics thereof are detailed in the consultation response report.

The authority received 4 individual responses by the consultation closing date of 22 September 2022. Of the total 4 individual responses received all were in favour of the proposal.

National data and research

A great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.

Household projections by local authority <https://gov.wales/sites/default/files/statistics-and-research/2020-08/subnational-household-projections-local-authority-2018-based-272.pdf>

Future population trends <https://gov.wales/sites/default/files/publications/2021-12/future-trends-report-wales-2021-narrative-summary.pdf>

ONS 2016 population estimates <https://gov.wales/mid-year-estimates-population-2020>

Protected characteristic data from 2011 Census <https://gov.wales/statistics-and-research/census-population/?lang=en>

Changes to school provision, in the form of statutory school organisation proposals, are often necessary as part of local authority plans.

The School Standards and Organisation (Wales) Act 2013 requires that the Welsh Ministers issue a School Organisation Code. The School Organisation Code 2018 sets out requirements for consultation upon and publication of statutory proposals for change and local authorities are required to follow the Code. The Code sets out requirements and provides guidance in respect of school re-organisation proposals brought forward to reconfigure school provision and for those responsible for determining proposals. The consultation process follows Welsh Government guidelines outlined in the School Organisation Code.

Local data and research

The Council is using current demographic, school, and pupil data to inform the proposal. A strategic review of data was used to inform the process.

Ysgol Y Ddraig benefits from suitably sized classrooms, a main hall for sport and dining, offices for headteacher and administration, a staffroom, and break out areas for pupil interventions. The school is fenced to safeguard pupils with intercom access for visitors. Within the grounds, there are external play areas, a multi-use games area (MUGA) and habitat areas to enhance pupil wellbeing.

The SRB would be accommodated within two adjacent classrooms with access to outdoor space. Staff would utilise the existing staff room within Ysgol Y Ddraig to help foster a strong connection between the SRB and Ysgol Y Ddraig improving integration.

The proposed new location would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21st Century
- Unobstructed access between all internal areas for children and staff
- Enhanced safeguarding and site security for pupils and staff
- Improved outdoor sports facilities for ALN pupils
- Specialist provision to provide a curriculum that best meets the needs of learners
- Full access for the whole community with full disabled access to internal and external areas.

6. How robust is the evidence?

Does it show what the impact will be (positive and negative)?

This proposal pays due regard to the need to eliminate discrimination, advance equality, and foster good relations as an integral part of the decision making process. The impact of the proposal will be positive in terms of providing improved learning environments which are adaptable to change and will challenge and support children to reach their full potential. The SRB is also more centrally located in the Vale ensuring access to the SRB is improved to the wider authority area.

There may be a negative impact in terms of :

- Management of staff and resources may be disrupted during the implementation of the proposal. As the base is already at the proposed site, this would be minimal.
- Pupils maybe further disrupted due to the proposal. It is noted that the SRB has temporarily moved to Ysgol Y Ddraig which would limit any additional disruption if the proposal were approved.
- Some staff and pupils will have further to travel to the relocated base.

What are the gaps?

The protected characteristics of future pupils attending the SRB are unknown at this stage. There is limited information held within the Directorate of the protected characteristics of the staff and governing body however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new location. As the staff and governing body are small in number, this data may also serve to identify individuals and personal information held about them. However as part of the consultation several opportunities via a variety of confidential methods were given to staff and governors to express concerns with relation to their personal circumstances as well as any wider concerns. No issues were raised during the consultation or subsequently that were considered to have an adverse impact on the protected characteristics of staff

or governors. As a result this is not included in this assessment.

The Council would ensure that all staff and governors would not be adversely impacted as a result of their protected characteristic as a result of this proposal.

What will you do about this?

Consideration of the protected characteristics of the pupils, staff and Governing Body would be reflected in the SRBs in location. For example via the provision of a fully accessible building at Ysgol Y Ddraig.

The protected characteristics of future occupiers of the school cannot be known however Ysgol Y Ddraig would ensure equality of opportunity for all those accessing the new building.

Information is provided to the school by the parents and professionals on the child's enrolment at the school. This allows the school to ensure that the school can meet their needs.

What monitoring data will you collect?

The Pupil Level Annual School Census (PLASC) data is collected on an annual basis, protected characteristics are captured through this process.

How often will you analyse and report on this?

The pupils Level Annual School Census (PLASC) is completed annually. The Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's governing body, the Council, the Central South Consortium and Estyn.

Where will you publish monitoring data and reports?

School Census is published by Welsh Government on the STATS Wales website for each local authority area.

<https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census>

There would be continued monitoring of school standards across all year groups by the governing body, the Local Authority, and the Central South Consortium and via Estyn.

Standards in schools are monitored on an annual basis by the Consortium and reported back to the Local Authority. Standards for children who have been identified with additional learning needs, along with those children identified as school action and school

action plus will also be part of the Annual National Categorisation School Report carried out by the Central South Consortium in partnership with the school.

7. Impact

Is there an impact?

There would be a positive impact on persons with the protected characteristics of age, disability, gender reassignment and identity, religion/belief, and human rights.

There has been no perceived negative impact on the protected characteristics identified.

The positive impacts are outlined below in the relevant section.

If there is no impact, what is the justification for thinking this? Provide evidence.

Evidence is assessed through the consultation process and through school and pupil data.

If there is likely to be an impact, what is it?

Age

The SRB serves pupils ranging from 3 to 11 year olds in the primary school setting. The proposal does not seek to change the age range. The relocation of the SRB to Ysgol Y Ddraig would maintain access to all pupils within the primary school age bracket.

Therefore, it is considered the proposal would have a **neutral** impact on the protected characteristic of age.

Disability

The SRB provides support to pupils which have Speech, Language and Communication Needs. The SRB serves the Vale of Glamorgan area with pupils attending the SRB 3 days a week from other mainstream schools in the Authority. The relocation to Ysgol Y Ddraig results in the SRB being more centrally located in the Vale of Glamorgan improving accessibility for pupils in the western Vale.

In addition Ysgol Y Ddraig was developed under Band A of the Sustainable Communities for Learning programme. The whole building was designed to comply with building

regulations for disabled access, with parking and access into the school building as well as access throughout the school.

The school does not have an attached specialist resource base (SRB); it provides specialist support for children who have identified needs in an inclusive setting within the school.

Based on the policies in place that would not change as a result of the move to a new school building, staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school and all people accessing the building will benefit from its accessible nature.

The proposal will therefore provide a **positive** impact for pupils, staff, governors, and the wider community visiting the school who have been identified within this protected group as they will have access to a fully accessible school building.

Gender reassignment, including gender identity

Gender reassignment is not recorded for Primary age pupils however individual pupils choosing to live other than at their birth gender are supported within Primary Schools. All children would continue to receive a high quality education at the new school site. Pupils and staff have the right to access the toilet that corresponds to their gender identity. Any pupil or staff member who has a need or desire for increased privacy, regardless of the underlying reason, would be provided access to a single stall toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide single stall toilets that can be used by all, albeit separate facilities would be available for adults and children.

The use of changing rooms by transgender pupils and staff would be assessed on a case by-case basis in discussion with the individual concerned. The school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing adverse impact for the individual. In most cases, transgender pupils or staff would have access to a changing space that corresponds to their gender identity.

None of the respondents indicated that this proposal would have an adverse impact on their gender identity. Based on current evidence this proposal would have a **neutral** impact on this protected group.

Marriage and civil partnership (discrimination only)

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. This information is not held at a directorate level for staff and governors however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. Pupils at the school are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the transfer to a new school building, this proposal would have a **neutral** impact on this protected group.

Pregnancy and Maternity

It is considered that there will not be a negative impact on pupils in this protected group as there is a minimal likelihood of pupils falling within this protected group due to the age range of the school. The provision of education for any pupil who were within this protected group would remain unaltered by the proposal.

Staff who are currently on maternity leave or are pregnant at the point of the proposed move would be protected under the Equalities Act 2010.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard however reference to the impact, both positive and negative, on future children was made in a small number of responses. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

Race

The predominant ethnicity at Ysgol Y Ddraig Primary is currently White – Welsh/English/Scottish/Northern Irish British. This is reflective of the wider Vale Primary School population which has an average of 90% White British pupils.

As the children will be moving to a new school location are from schools from around the Vale, it is unlikely that the proposal will change the ethnic profile of the school.

All staff, pupils and governors would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal and the very small number of pupils in this category, this proposal would have a **neutral** impact on people in this protected group.

Religion and belief

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Respect for all religious and non-religious beliefs would not change due to this proposal. Ysgol Y Ddraig is a community school the same as Llandough Primary School and the aspect of the curriculum relating to religion and belief would not change as a result of this proposal.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. It is considered the proposal would have a **neutral** impact on people in this protected group.

Sex

The Llandough Primary school currently has 53% male pupils on roll and 47% female. Whereas Ysgol Y Ddraig has 57% male pupils on roll and 43% female. The percentage split at both schools is a similar percentage to the Vale wide primary pupil population (49% female and 51% male). Overall it is considered there would be no perceived negative impact.

Children of both sexes would be treated and taught equally in the school at the new school location of for the SRB. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce - as far as possible - segregating pupils and students by Gender. Pupils would continue to be supported to enable equal access to PE and where lessons are segregated by sex/gender they would be enabled to participate in the activity which corresponds to their gender identity if this is what they request. The aspect of the curriculum management relating to any identified gender based attainment gap would not change as a result of this proposal.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school. .

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

Sexual orientation

Inclusivity and respect of others is an intrinsic element of the national curriculum. The principles of school inspection as described in the 'Framework for School Inspection', September 2015 states that the inspection will focus on the needs of pupils and parents by evaluating the extent to which schools provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. The Estyn School Inspection Handbook also details how inspection will evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social, and cultural development Estyn will look for evidence where pupils develop awareness and respect for diversity in relation to, for example gender, race, religion and belief, sexual orientation, and disability.

Inspectors will also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

Welsh language

Parental demand for Welsh medium primary education will continue to be provided through the relevant catchment area schools in relation to the pupils home location.

Ysgol Y Ddraig and Llandough Primary Schools are both English medium schools and this proposal does not seek to change this. The Council was very successful in increasing Welsh medium primary sector capacity within the Vale of Glamorgan under Band A of the 21st Century Schools Programme. In order to build on this success, a key priority for Band B is to increase capacity in the Welsh medium secondary sector as well as consideration of further developments at primary level. In order to ensure that the Council actively addresses the Welsh Government target of one million Welsh speakers by 2050, the Council will be undertaking an active programme of addressing need with regard to Welsh and English medium education.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group.

Human rights

Consideration of the UNICEF document, A Human Rights-Based Approach to Education For All was given as part of the development of this consultation. This document advises that Chapter 2 introduces a conceptual framework for the rights-based approach to education that embodies three interlinked and interdependent dimensions. It contends that human rights related to education cannot be realized unless and until all three are addressed:

- The right of access to education – the right of every child to education on the basis of equality of opportunity and without discrimination on any grounds. To achieve this goal, education must be available for, accessible to and inclusive of all children.
- The right to quality education – the right of every child to a quality education that enables him or her to fulfil his or her potential, realize opportunities for employment and develop life skills. To achieve this goal, education needs to be child-centred, relevant and embrace a broad curriculum, and be appropriately resourced and monitored.
- The right to respect within the learning environment – the right of every child to respect for her or his inherent dignity and to have her or his universal human rights respected within the education system. To achieve this goal, education must be provided in a way

that is consistent with human rights, including equal respect for every child, opportunities for meaningful participation, freedom from all forms of violence, and respect for language, culture, and religion.

This proposal has been presented in order to address the right of access to education, the right to quality education and the right to respect within the learning environment for all pupils within the Vale of Glamorgan.

Moving the school to improved accommodation would:

- Continues to provide targeted support for pupils with Speech, Language and Communication Needs within a mainstream primary school environment.
- Provides improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Provides continuity of provision within the Vale of Glamorgan for pupils with Speech, Language and Communication Needs.
- Provides opportunities for professional development throughout Ysgol Y Ddraig.
- Ensures that pupils with Speech, Language and Communication Needs can have their needs met within the local authority and can be supported to remain in their mainstream school.

It is not anticipated that there would be any adverse impacts for staff as they would simply move to a new location on their existing contracts. Any proposed changes to staffing would be subject to full consultation with staff and the relevant trades unions where necessary.

The Vale of Glamorgan Council fully supports the governors, headteacher and staff at the school with any employment related matters. The school has access to the Council's Human Resources policies and procedures, including recruitment policies. The Human Resources service works closely with governors to ensure regular and clear communication with all employees takes place on all matters relating to a change in location of their workplace.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group.

Socio-economic duty

The overall aim of the duty is to deliver better outcomes for those who experience socio-economic disadvantage. The duty, which applies to strategic decisions, commenced 31 March 2021. Socio-economic considerations have subsequently been assessed and the results are documented below. For the purposes of this assessment, socio-economic indicators include education, economic, employment, health and wellbeing, and accessible transport.

Education

It is determined that if implemented the proposals would have the following benefits

related to improving educational outcomes:

- Continues to provide targeted support for pupils with Speech, Language and Communication Needs within a mainstream primary school environment.
- Provides improved learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Provides continuity of provision within the Vale of Glamorgan for pupils with Speech, Language and Communication Needs.
- Provides opportunities for professional development throughout Ysgol Y Ddraig.
- Ensures that pupils with Speech, Language and Communication Needs can have their needs met within the local authority and can be supported to remain in their mainstream school.

The proposal is unlikely to have a significant impact on any other schools in the local area as the SRB will continue to serve the whole of the Authority area.

Economic

The SRB will serve the whole local authority area. However, the SRB will now be based within a different educational setting. The new setting is within the Ward area of Llantwit Major. Llantwit Major ward is a relatively urban ward area and includes a number of rural areas around the outskirts of Llantwit Major. The ward area relates mainly to the settlement of Llantwit Major which is considered to be a district service centre within the Vale of Glamorgan. This settlement is relatively wealthy however there are still areas of local deprivation.

Ysgol Y Ddraig is located within the Llantwit Major 2 ward in the Llantwit Major area. The overall the ward has a population of 10,621 (Office of National Statistics, 2019).

The ward has a low level of deprivation, overall it is within the 50% least deprived wards within Wales.

The school will take in pupils from across the Vale of Glamorgan with more varied socio-economic status, this would not change as a result of these proposal.

Employment

The Vale of Glamorgan Council would fully support the governors, headteacher and staff at the school with any employment related matters. The school has access to the Council's Human Resources policies and procedures, including recruitment policies. The Human Resources service works closely with governors to ensure regular and clear communication with all employees takes place.

The proposal would not result in any loss of employment.

Health and Wellbeing

The school has a highly positive and inclusive ethos, which helps pupils to develop self-

esteem and grow in confidence.

Accessible transport

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'.

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.

None of the respondents indicated that these proposals would have an adverse impact on their socio-economic status in this regard. Based on current evidence noted above, these proposals would have a **neutral** impact on pupils from families which are socio-economically disadvantaged.

How do you know?

Explain this for each of the relevant protected characteristics as identified above.

Data is provided and analysed through the Pupil Level Annual School Census data collected in the January of each year. The Council also uses current demographic, school, and pupil data to inform the proposal. The staff would also continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

What can be done to promote a positive impact?

Explain this for each of the relevant protected characteristics as identified above.

The availability of the school, its benefits, and the facilities available will be published on the Council's website and through the Council's Parental Guide to School Admissions for parents to consider when making a decision on where to express a preference for a pupil place. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard would therefore be paid to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities would be key to the design of the new building. Having due regard to 'fostering good relations' involves having due regard to the need to tackle prejudice and promote understanding. This is an important aspect to curriculum delivery and would not change as a result of this proposal.

It is acknowledged that complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

Age

The school would continue to provide sufficient places for children of primary school age. Inclusivity and respect of others is an intrinsic element of the national curriculum which will continue at the school.

Disability

The proposal would have a positive impact as the new location of the SRB is within a more accessible school building.

Gender reassignment, including gender identity

All children would be supported to receive a high quality education if the proposal were to be successfully implemented regardless of gender identity. The school will have suitable facilities in place to accommodate pupils of any gender; no pupil or staff member would need to consider changing schools due to gender reassignment.

Inclusivity and respect of others is an intrinsic element of the national curriculum.

Marriage and civil partnership

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

Pregnancy and Maternity

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

Race

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

Religion and belief

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

Sex

Children of both sexes would continue to be treated and taught equally in the new school building. There would be no different methods of teaching or curricula for either sex. Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

Sexual orientation

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

What can be done to lessen the risk of a negative impact?

Explain this for each of the relevant protected characteristics as identified above.

No negative impacts have been identified as a result of this proposal.

Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

The current facilities are not fully accessible and this would be addressed positively as part of this proposal.

Will the impact be positive, negative, or neutral?

Explain this for each of the relevant protected characteristics as identified above.

Age – Neutral

Disability – Positive

Gender reassignment, including gender identity – Neutral

Marriage and civil partnership – Neutral

Pregnancy and Maternity – Neutral

Race – Neutral

Religion and belief – Neutral

Sex – Neutral

Sexual orientation – Neutral

(Welsh language – Neutral

Human rights – Neutral

Socio-economic duty – Neutral)

Please see reasons outlined in the previous sections. In conclusion, there is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely, improving the capacity and efficiency of education) and the decision to publish the proposals to make a regulated alteration is a proportionate means of achieving that aim.

8. Monitoring on-going impact

Date you will monitor progress

PLASC data is annual and if approved by cabinet a project plan for this proposal will be initiated. This will include reference to this document. Any changes in outcomes resulting from this ongoing analysis will be used to update this Equality Impact Assessment, including any mitigating actions which may be required.

Measures that you will monitor

PLASC data for all pupils will be broken down and monitored by Age, Disability, Race, Religion and belief and Welsh language. The Equalities Team monitors service data and provides information in the annual equality monitoring report. The measures identified for the education of pupils are a matter for the governing body in their School Improvement Plan.

Date you will review implemented proposal and its impact

Subject to the Council's approval, the school would receive enhanced support and challenge in the year following its move as is the practice following all school re-organisations. This will be provided by the Council. Thereafter, the school will be subject to routine monitoring and challenge from the Central South Consortium, Estyn, and the Council.

The Vale of Glamorgan Council works closely with the governing bodies of schools to ensure that standards are robust, that teaching and learning is of a high quality and that leadership and governance is strong. The Council works with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty's Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under section 104 of the Government Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority works with the Consortium to support and challenge all schools in the Vale of Glamorgan.

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

In September 2017, a new Estyn School Common Inspection Framework was introduced for all schools across Wales. Ysgol Y Ddraig was last inspected in May 2022 under Estyn's current Inspection Framework.

9. [Further action as a result of this equality impact assessment](#)

Possible Outcomes	Say which applies
No major change	Yes
Adjust the policy	
Continue the policy	
Stop and remove the policy	

10. [Outcomes and Actions](#)

Recommend actions to senior management team None
Outcome following formal consideration of proposal by senior management team None

11. [Important Note](#)

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.

12. [Publication](#)

Where will you publish your approved proposal and equality impact assessment? The Council's website
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13. [Authorisation](#)

Approved by (name)	Paula Ham
Job Title (senior manager)	Director of Learning and Skills
Date of approval	05 th October 2022

Date of review	
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THE VALE OF GLAMORGAN COUNCIL,
CIVIC OFFICES, HOLTON ROAD,
BARRY CF63 4RU

YSGOL Y DDRAIG, HAM LANE EAST,
LLANTWIT MAJOR, CF61 1TQ

LLANDOUGH PRIMARY SCHOOL,
DOCHDWY ROAD, LLANDOUGH,
PENARTH, CF64 2QD



STATUTORY NOTICE TO RELOCATE THE LLANDOUGH PRIMARY SCHOOL SPECIALIST RESOURCE BASE TO YSGOL Y DDRAIG FROM JANUARY 2023.

NOTICE IS GIVEN in accordance with sections 42(2) of the School Standards and Organisation (Wales) Act 2013, 'the Act', and the School Organisation Code 2018 that the Local Authority, having consulted such persons as required, propose to make regulated alterations to Llandough Primary School and Ysgol Y Ddraig Primary by:

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

These proposals are considered under section 2.3 of the School Organisation Code (2018). Section 2.3 refers to Regulated Alterations of a school, which includes the transfer of any school to a new site.

Proposal summary:

Both primary schools are English-medium community schools with an age range of 3-11. Llandough Primary School is located at Dochdwy Road, Llandough, Penarth, CF64 2QD. Ysgol Y Ddraig is located at Ham Lane East, Llantwit Major, CF61 1TQ. Both schools are maintained by the Vale of Glamorgan Council.

The proposal will result in the Specialist Resource Base at Llandough Primary School relocating to Ysgol Y Ddraig. It is proposed to implement the proposal on Monday 9th January 2023.

As of January 2022, there were 16 (FTE) pupils of statutory school age on roll at the Specialist Resource Base. The Specialist Resource Base capacity for pupils of statutory school age will remain at 20 places. The Specialist Resource Base will be provided within the existing Ysgol Y Ddraig school building. The Vale of Glamorgan Council will be the admission authority and continue to maintain the school.

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'. 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 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.

This proposal would impact on existing learner travel arrangements as the school would be located to another site. The specialist resource base would continue to serve the whole Vale of Glamorgan area. Free travel arrangements would be based upon the proximity to the new location of the specialist resource base at Ysgol Y Ddraig, Ham Lane East, Llantwit Major.

Consultation:

The Local Authority undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees, along with the proposer's responses is available to view on the Vale of Glamorgan Council website at the following address:

<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Consultation-on-SRB-re-location-to-Ysgol-Y-Ddraig.aspx>

Submitting objections:

In accordance with section 49 of 'the Act', any person may object to the proposal before the end of 28 days beginning with the day on which the proposals were published, by

Wednesday 7th December 2022.

Objections should be sent to:
Sustainable Communities for Learning,
Civic Offices,
Holton Road,
Barry
CF63 4RU

or e-mail sustainablecommunitiesforlearning@valeofglamorgan.gov.uk

The Local Authority will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, at the time of notification to stakeholders of the determination of the proposal.

Signed:



Paula Ham
Director of Learning & Skills
Vale of Glamorgan Council
09/11/2022

DIRECTORATE OF LEARNING AND SKILLS OBJECTION PERIOD SUMMARY REPORT

ON THE PROPOSAL TO:

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



This document can be made available in Braille. Information can also be made available in other community languages if needed. Please contact us on 01446 709828 to arrange this.

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1. BACKGROUND

The Council undertook a statutory consultation exercise on the proposal from 13th July 2022 to 22nd September 2022. The aim of the consultation was to inform prescribed consultees about the school re-organisation proposal being put forward under section 2.3 of the School Organisation Code. Section 2.3 refers to Regulated Alterations of a school, which includes changing the location of a school. The proposal for the school was as follows:

- 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.

The consultation process followed Welsh Government guidelines as outlined in the School Organisation Code 2018. It provided an opportunity for prescribed consultees as well as members of the local community to learn about the proposal and for the Vale of Glamorgan Council's Cabinet to hear the views of all those with an interest so that they can be taken into account before decisions are made.

During the consultation exercise, 4 individual responses were received by the consultation closing date of 22nd September 2022. Regarding the representations made all 4 responses were in favour of the proposal. However, clarifications were requested on certain aspects of the proposal. A summary of the responses received and the Council's response to the clarification requests were published in the consultation report and made publicly available on the Council's website.

1.1. CONSULTATION REPORT

A consultation report was published following the consultation exercise (<https://www.valeofglamorgan.gov.uk/Documents/Working/Education%20and%20Skills/21st-Century-Schools/LPS-to-YYDd-Proposal-Consultation-Response-Report-v2.pdf> refers).

The consultation report was considered by the Council's Cabinet on 3rd November 2022 which can be viewed using the following link:

<https://www.valeofglamorgan.gov.uk/Documents/Committee%20Reports/Cabinet/2022/22-11-03/Minutes.pdf> - Minute C121 refers

1.2. STATUTORY NOTICE

Following consideration of the consultation report on 3rd November 2022, the Council's Cabinet decided to progress the proposal and approve the publication of a statutory notice.

A statutory notice was displayed on 9th November 2022 at both schools involved in the proposal. The notice was displayed for 28 days until 7th December 2022 to allow any person to object to the proposal in accordance with section 49 of the School Standards and Organisation (Wales) Act 2013

The notice was published on both the schools' and Vale of Glamorgan Council's website which can be viewed using the following link:

<https://www.valeofglamorgan.gov.uk/en/living/schools/Consultations/Consultation-on-SRB-re-location-to-Ysgol-Y-Ddraig.aspx>

A hardcopy of the notice was also displayed at the main entrances of the schools. Copies of the notice were distributed to parents, carers and guardians, governors, and staff members, as well as respondents who wished to be notified via email. All other organisations and consultees required under the School Organisation Code 2018 were provided with a copy of the letter and notice as an attachment to the email as well as a link to the notice on the website.

This report outlines the statutory process and provides an overview of any objections received.

1.3. STATUTORY NOTICE STAKEHOLDER NOTIFICATION

Engagement for the statutory notice 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 could view the notice on the Council's website below:

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

Objections were requested via email or letter to the following addresses:

Sustainable Communities for Learning,
Civic Offices,
Holton Road,
Barry
CF63 4RU

or

e-mail: sustainablecommunitiesforlearning@valeofglamorgan.gov.uk

2. OBJECTION PERIOD SUMMARY

No objections were received during the objection period to the Statutory Notice between 9th November 2022 to 7th December 2022.

2.1. LATE OBJECTIONS

The objection period to the statutory notice closed on 7th December 2022. However, 2 objections were received after the close of the objection period on the 8th and 9th December 2022. Both representations raised the same concerns as part of the objection which are summarised below:

- Extended travel times to and from proposed work place,
- Additional expense due to travel,
- Extended work hours due to the need to use public transport,
- Compensation required due to the change to working terms and conditions.

Both objections were received late, and the Council does not have to consider them under the statutory guidance contained within the School Organisation Code (2018). However, it is good practice to respond to concerns when raised, therefore a response to the concerns outlined has been provided below:

ISSUE 1

Relocation would result in additional travel time and costs for staff

Concerns were raised based on the relocation of the SRB to Ysgol Y Ddraig and the impact this would have on staff travel times and the associated costs with the additional travel. References were made to the impact the change would have on existing contractual arrangements with staff and the need for compensation.

Council Response

The Council is not responsible for how members of staff attend work, staff are responsible to make their own travel arrangements to and from their place of work. Furthermore, travel time to and from work is not considered to be working hours and therefore would not be viable for compensation. The statutory notice period relating to the move of the SRB has been followed and the relevant union consultees contacted as part of the process. It is considered sufficient time has been given for staff to consider travel arrangements to the proposed new location.

Although the SRB has moved location to Llantwit Major, the SRB serves the wider Vale of Glamorgan, and the new location is more central to serve both the western and eastern areas of the Vale being more accessible to a wider range of schools.

The new location will provide better facilities as the school has been redeveloped under the sustainable communities for learning programme (previously 21st Century Schools). The proposed new location would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21st Century
- Unobstructed access between all internal areas for children and staff
- Enhanced safeguarding and site security for pupils and staff
- Improved outdoor sports facilities for ALN pupils
- Specialist provision to provide a curriculum that best meets the needs of learners
- Full access for the whole community with full disabled access to internal and external areas.

This will help improve both the education environment for pupils and the working environment for staff.

Contractually, all LSA staff are informed of a primary base of work, but this can be subject to change following the relevant notice period to any other location within the boundary of the Vale of Glamorgan. The contracts confirm no compensation or excess mileage allowance will be payable in respect such a change. The two teachers employed for the SRB provision are subject to different contractual arrangements. Their contracts do not include reference to working in other locations. However, as part of the proposal all staff have been given the relevant notice and the statutory consultation periods have been followed in relation to the proposal to allow staff to raise concerns and objections to the proposal to be considered by the Council.

Since early 2021-2022 when the temporary move to Y Ddraig was agreed, the service has paid excess mileage to staff where the total mileage from home to work and return is greater as a result of the temporary relocation to Y Ddraig. This was agreed to compensate for the lack of notice that the service was able to give employees due to covid restrictions in place at the time. For employee's who do not drive, taxi expenses have been covered for the same period to ensure a fair approach to all staff. As part of the Trade Union consultation meeting on 15th June 2022, the proposal to cease excess mileage payments and payment of taxi expenses was put forward and this was also explained to the staff in a consultation meeting on 17th June 2022. The service feel that they have acted reasonably by paying excess mileage/expenses to date. However financially the Council will regrettably be unable to continue to pay excess mileage and taxi expenses due to significant financial pressure on the service.

As noted above, as part of the consultation process the Council have worked with the relevant trade unions to outline the changes to staffing arrangements due to the relocation proposal to ensure staff interests were represented and addressed.

Overall, it is considered on balance the new location for the SRB would benefit the intended users of the service due to access to newer facilities.

3. CONCLUSION

The Council concludes that the proposal would have an overall positive impact on the existing and future pupils at Ysgol Y Ddraig and the SRB following the relocation of the unit. 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.

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.

Regarding travel arrangements, 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.

ALN pupils in the SRB 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. In addition where specialist travel arrangements are not required pupils who live 2 miles or further away from the school will be eligible for standard free school transport.

It is noted that no objections were received for the proposal during the objection period to the Statutory Notice.

4. RECOMMENDATIONS

It is recommended:

1. That the Council's Cabinet consider the objection report.
2. That the Council's Cabinet approve the publication of the objection report
3. That the Council's Cabinet approve the implementation of the proposal to relocate the Specialist Resource Base (SRB) at Llandough Primary School to Ysgol Y Ddraig from January 2023.
4. That the Council's Cabinet refer the Consultation Document, Consultation Report, Statutory Notice, Objection Report to the Council for final determination in line with section 51 of the School Standards and Organisation (Wales) Act 2013.

5. 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 to ensure the appropriate support is available via the main school funding formula to cover additional costs associated with the SRB for the school. 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.