

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Thursday, 15 January 2026</b>
Relevant Scrutiny Committee:	Start Well Scrutiny Committee
Report Title:	<b>Consultation on the Proposal to Create New Delivery Models for Enhanced and Sustainable Specialist Provision</b>
Purpose of Report:	To advise Cabinet of the outcome of the consultation exercise undertaken on the proposal to create a new delivery model for enhanced and sustainable specialist provision.
Report Owner:	Cabinet Member for Education, Arts and the Welsh Language
Responsible Officer:	Director of Learning and Skills
Elected Member and Officer Consultation:	<p>Operational Manager, Strategy and Resources Sustainable Community for Learning Project Manager Head of Strategy, Community Learning and Resources Committee Reports</p> <p>Public consultation with all required consultees and interested parties has been carried out, in accordance with the relevant legislation and statutory guidance</p>
Policy Framework:	This is a matter for Executive decision by Cabinet.
<p><b>Executive Summary:</b></p> <ul style="list-style-type: none"> <li>The purpose of this report is to advise Cabinet of the outcome of the <a href="#">statutory consultation</a> on the proposal to create a new delivery models for enhanced and sustainable specialist provision.</li> <li>During the consultation period, the Council received 4 responses by the closing date of 18th October 2025. Consultees were asked to indicate whether they 'support,' 'do not support' or have 'no opinion' on the proposals. 2 respondents indicated they supported the consultation, with 2 objecting to the proposal.</li> <li>A summary of key themes and issues raised during the consultation exercise is included in the consultation response report, attached at Appendix B, and summarised in the body of this report.</li> <li>Following the completion of the consultation period, a decision is now required on whether to progress the proposals to the next stage via the publication of a statutory notice.</li> </ul>	

## **Recommendations**

1. That Cabinet notes and approves the Consultation Report ([Appendix A](#)); the Consultation Response Report (Appendix B); other Appendices included as part of this report, including the Community Impact Assessment and Equality Impact Assessments at Appendix C and D respectively, as required under paragraph 3.6 of the School Organisation Code 2018, to create new delivery models for enhanced and sustainable specialist provision.
2. That Cabinet agrees to proceed to the next statutory stage of the proposal to create new delivery models for enhanced and sustainable specialist provision, in accordance with the School Standards and Organisation (Wales) Act 2013 and the statutory code.

## **Reasons for Recommendations**

1. To ensure that Cabinet considers all relevant information as required under the statutory Code in reaching a decision on whether to proceed to the next statutory stage of the proposal.
2. To enable the Council to move to the next stage of the process by publishing a statutory notice, thereby allowing stakeholders a further opportunity to comments during the objection period and to ensure that there is capacity to provide a centre of excellence for social, emotional and mental health needs and provides a stimulating, rich environment and specialist staff to cater for children with social, emotional and mental health (SEMH) needs on a full-time basis, reflecting the Council's commitments to meeting the requirements of the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018).

## **1. Background**

- 1.1 On 11th July 2025, the Council's Cabinet authorised the Director of Learning and Skills to undertake a consultation from 8th September to 19th October 2025 on proposal to create new delivery models for enhanced and sustainable specialist provision.
- 1.2 In recent years, the growth in Additional Learning Needs (ALN) need has increased exponentially across our overall provision in specialist education, and there is a need to consolidate support to widen access to specialist support, training and interventions across all our schools. Information gathered suggests that due to an increase of pupils with social, emotional and mental health (SEMH), a more strategic approach is needed, to improve sustainability of our services for all of our pupils.
- 1.3 The consultation was done in two parts:
  - To establish a new English Medium specialist resource base at Holton Primary School with effect from 1st January 2026, or as soon as possible thereafter. A pilot provision is currently operating at the school in order to inform decision making.

- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.
- 1.4** This would mean a change to the existing provision currently provided at Y Bont. Y Bont is a resource base currently situated at High Street Primary School. This base acts as a centre of excellence for behavioural, emotional and social difficulties and provides a stimulating, rich environment and specialist staff to cater for children with SEMH needs on a full-time basis. Places are offered on a full-time basis with dual registration with their home school, and the base operates as a 'revolving door' with the expectation that following a period of intervention and specialist support, pupils will be able to leave the resource base and be reintegrated back into full time mainstream education.
  - 1.5** While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county.
  - 1.6** There is an identified trend in a growth in ALN across all of our schools. In 2023 there were 107 pupils in Welsh medium primary schools identified as having SEN/ALN which has risen from 88 in 2022. In all mainstream primary schools, the number of pupils with SEN/ALN has risen from 1,227 in 2021 to 1,251 in 2023. Data also suggests a clear increase in children and young people being identified as having issues relating to their mental health, emotional and social development.
  - 1.7** The Specialist Resource Bases (SRB) would provide periods of integrated provision for pupils with social, emotional and mental health (SEMH), to improve sustainability of our services for all of our pupils.
  - 1.8** This report seeks Cabinet approval of the proposal following consideration of the Consultation Report and through the publication of the proposal in the form of a statutory notice.

## **2. Key Issues for Consideration**

### **Consultation**

- 2.1** On 11th July 2025, the Council's Cabinet authorised the Director of Learning and Skills to undertake a consultation from 8th September to 19th October 2025 on a proposal to create new delivery models for enhanced and sustainable specialist provision.
- 2.2** The consultation was issued in accordance with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018 ("the Code").
- 2.3** The [Consultation Document](#) outlines the Council's proposal to create new delivery models for enhanced and sustainable specialist provision.

- 2.4** The consultation document was issued to prescribed consultees as outlined in the School Organisation Code 2018 (“the Code”). The consultation document and Appendices are attached at [Appendix A](#) . The statutory consultation was held to seek comments from relevant parties as defined in “the Code” which create new delivery models for enhanced and sustainable specialist provision.
- 2.5** In accordance with the School Organisation Code (2018), respondents were encouraged to submit their views in writing to the Council for consideration. Respondents had the option to respond via post, email or electronic survey hosted online.
- 2.6** The Council received 4 responses by the closing date of 18th October 2025 and a response from Estyn. Consultees were asked to indicate whether they ‘support,’ ‘do not support’ or have ‘no opinion’ on the three individual elements of the proposals.
- 2.7** 2 respondents (50%) were in favour, 2 respondents (50%) were not in favour of the proposal.
- 2.8** A number of themes emerged following the consultation process which are outlined below and include the council’s response to each theme. Themes 1 -3 under Annex A, in the response report, relate to concerns raised by respondents who did not support the proposal. It also included some queries raised by Estyn for further information and clarity. Themes 4 – 5 relate to responses in support of the proposal. Further details on each theme can be found within the Consultation response Report (Appendix B).
- 2.9** **THEME 1 – Lack of Clarity and communication.**

Respondents raised concerns regarding the proposed changes to the Engagement Service and their impact on schools. Respondents highlighted a lack of detailed information about how the service will function across different educational settings, particularly mainstream schools already facing staffing and funding pressures. There is uncertainty about whether experienced staff will be transferred to Holton Primary to support the new provision, and how pupils currently attending Y Bont will be supported during their transition. Stakeholders also noted the absence of technical details on sensory design feature such as lighting, acoustics, and zoning linking to the needs of the identified cohort. Additionally, the proposal mentions a new all-age SEMH (Social, Emotional, and Mental Health) school but lacks clarity on its governance, timeline, and integration with existing services, raising concerns about the coherence and sustainability of the overall specialist provision system.

**Council’s response to the concerns raised**

In response, the Vale of Glamorgan Council is developing a comprehensive operational framework to address these concerns and ensure transparency. The internal reorganisation of the Engagement Service into dedicated teams, focusing on specific ages and areas of need, and prioritising early intervention, is ensuring greater consistency of advice and support across all Vale of Glamorgan schools for pupils age 3-11. Detailed information about the internal changes has now been discussed individually with every school and the new support offer is

now well understood. Access to Engagement Service consultation, advice, specialist training and interventions continues to be available to all schools on a needs led basis. The council is committed to delivering inclusive education and equitable access to specialist resources, aiming to prevent mainstream schools from becoming isolated.

Y Bont Staff have been transferred to the mainstream staffing of High Street Primary school where the Y Bont base was situated. Discussions are ongoing to identify experienced staff who can support Holton Primary, with a focus on retaining specialist expertise, ensuring smooth skill transfer, and minimizing disruption for pupils and families. As the Holton base environment has been resourced and updated for pupils with SEMH needs, consideration of the sensory needs of the pupils has been central to layout and resourcing including lighting and acoustics.

## **THEME 2 - Impact on Existing School Provisions**

Concerns have been raised by governors at Pencoedtre and Whitmore High Schools regarding the proposal to extend outreach services for Years 8–11 through their specialist resource bases. These schools, which currently operate at full capacity, were not consulted prior to their inclusion in the plan. Additionally, the autism bases at both institutions were omitted from the Community Impact Assessment, raising questions about the adequacy of planning and stakeholder engagement. Concerns also raised over the lack of provisions for increased staffing and funding, which are essential to support any expansion of services without compromising existing operations.

### **Council's response to the concerns raised**

We recognise that Whitmore and Pencoedtre are at full capacity, therefore, to acknowledge this the model for supporting this age range changed. We have changed the offer for 8-11 support, especially as there has been a significant amount of specialist advice and interventions ring fenced for a very small number of pupils with medical diagnosis of autism previously. The LA are advising schools to seek advice from agencies already used by schools for all other pupils without autism diagnosis e.g. Educational Psychologist Service and In-Reach. In-Reach are anticipating a reduction in requests for advice and support for pupils in year 7 as the Engagement Service (ES) will be supporting these children, so they now have more capacity to advise on the complex pupils with Mental Health *and* a medical diagnosis of autism.

We recognise the pressures facing mainstream schools, particularly in relation to staffing and funding. The provisions would work together to remove barriers to on-going inclusion within the mainstream school and build its capacity to meet the pupil's future educational need. There is a wealth of knowledge and skills around supporting pupils with autism within Vale of Glamorgan secondary schools, in comparison with other areas of need, and delivering our service based on medical diagnosis is not in line with ALNET.

The most requested and impactful piece of work in secondary schools has been the 'All About Me' (previously 'Disclosure') programme. Last year the ES developed training for mainstream schools to use this intervention, in

anticipation of the changes. Evaluation of the first roll out is that staff feel confident and equipped to take on the intervention themselves. The ES have also developed an All About Me program for young people with ADHD and a parallel programme around understanding the survival brain, for young people who have experienced or are continuing to experience painful and scary life events. The ES can deliver any of these for pupils in Year 7 when appropriate, as we upskill your staff.

The involvement of the ES across all areas of need, SEMH and ND, with and without a diagnosis will be helpful. The positive change means that schools can now request ES involvement around Year 7 pupils not already known to the service, if new needs emerge at a school, or new pupils transfer. The ES should also be more available to work on capacity building and upskilling staff on other areas of need. The ES are working with secondary ALNCOs together for the Solution Focused Problem-Solving groups and good practice sharing.

The Council has highlighted response which includes the absence of the autism bases from the community impact assessment. To ensure that the assessment reflects the full scope of community needs, it will be necessary for the Council to reevaluate the analysis, ensuring the perspectives of all those directly affected. Doing so will strengthen the credibility of the assessment and demonstrate a genuine commitment to inclusive and comprehensive planning.

## **2.10 THEME 3 - Operational and Logistical Challenges**

Operational and logistical challenges have been identified in relation to the Holton Road site, particularly concerning school transport. Key issues include restricted parking zones and enforcement policies that may obstruct safe and legal access for school transport vehicles. Additionally, the need for staff to escort pupils' places further strain on already stretched school resources. The use of part-time placements and staggered timetables adds complexity to transport arrangements, increasing both logistical difficulties and associated costs. These challenges are compounded by an existing overspend of approximately £1.2 million in the transport budget, raising serious concerns about the financial sustainability of the current system.

### **Council's response**

In response, colleagues for the Directorate of Learning and Skills have worked collaboratively with Highways and Parking Enforcement teams to identify suitable drop-off and pick-up zones near schools.

Operational and logistical challenges relating to the Holton Road site, including school transport, parking restrictions, enforcement policies, and the impact of staggered timetables, have already been considered and addressed as part of the planning process. Mitigation measures have been put in place to ensure safe and legal access for school transport vehicles, while resource implications for staff have been factored into the operational framework. These steps have been taken to minimize disruption, manage costs effectively, and provide assurance that the identified issues are being actively managed.

**The following section provides the key themes raised during the formal consultation period in support of the proposal.**

**2.11 THEME 4 - Recognition of Need and Strategic Value**

The proposal has received broad support as a strategic and timely response to the growing demand for specialist educational provision. Stakeholders recognise the SRB (Specialist Resource Base) initiative as a well-considered solution that will enable children with additional learning needs (ALN) to access appropriate support more effectively. The changes are also viewed as a more efficient use of resources, enhancing service capacity and long-term sustainability.

**Council's response**

The increasing demand for specialist provision is a challenge we must meet with urgency and care. There is an identified trend in a growth in ALN across all of our schools. In 2023 there were 107 pupils in Welsh medium primary schools identified as having SEN/ALN which has risen from 88 in 2022. In all mainstream primary schools, the number of pupils with SEN/ALN has risen from 1,227 in 2021 to 1,251 in 2023. There is also evidence of a clear increase in children and young people being identified as having issues relating to their mental health, emotional and social development. The proposal reflects our proactive approach to expanding capacity in a sustainable and inclusive way, reducing pressure on existing services and ensuring equitable access to high-quality support across the Authority.

**2.12 THEME 5 - Support for Reforming the Specialist Provision Model**

Respondents agreed that the current model requires updating to meet the evolving needs of children and young people. Respondents support the Vale of Glamorgan Council's commitment to modernising and expanding specialist services.

**Council's response**

The Vale of Glamorgan's existing structures must adapt to better serve children and young people with increasingly complex needs. This proposal represents a significant step forward in strengthening early intervention and outreach, enhancing the flexibility and capacity of specialist provision and promoting equity of access across all settings. The Council's School Investment Programme reflects the Council's commitments for further development of specialist resources; it is a strong focus for the directorate of Learning and Skills and a key driver for this proposal.

The Vale of Glamorgan Council are committed to ensuring that these changes are informed by evidence, shaped by lived experience, and delivered in partnership with our schools and communities.

**2.13** Along with the consultation report, a Community Impact Assessment is attached at [Appendix C](#) , and an Equality Impact Assessment included at Appendix D for Members' consideration.

## **Quality and standards in education**

- 2.14** Estyn's most recent inspections took place in 2019 at Holton and in 2025 at Ysgol y Deri. The overall inspections were positive.
- 2.15** In Estyn's response to the consultation, they stated that the proposal is well founded and likely to at least maintain and improve educational standards in the Vale of Glamorgan. Further information and details on the proposal were needed for clarification. The additional information was specified in Annex A of Appendix A (Consultation response report).

## **Community impact**

- 2.16** 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 6 of the 8 measures assessed and a positive impact on 2 of the 8 measures.
- Children living in the catchment are attending their local school.
  - Services provided by the school for the local community, including extra-curricular activities.
- 2.17** It is concluded from the Community Impact Assessment that the proposal would have a positive impact upon the local community.

## **Equality Impact Assessment**

- 2.18** A full equality impact assessment can be found at Appendix D to this report. The findings of this assessment are summarised below. Full details of the assessment for each protected characteristic can be found at Appendix D.

<b>Protective characteristic</b>	<b>Impact</b>
Age	Positive impact
Disability	Positive impact
Gender reassignment, including gender identity	Neutral impact
Marriage and civil partnership	Neutral impact
Pregnancy and Maternity	Neutral impact
Race	Neutral impact
Religion and Belief	Neutral impact
Sex	Neutral impact
Sexual orientation	Neutral impact
Welsh Language	Neutral impact
Human rights	Neutral impact
Socio-economic duty	Neutral impact

## **Travel arrangements**

- 2.19** 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 2 miles or further from their nearest suitable school.

- 2.20** 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.
- 2.21** 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. Pupils would attend the SRB from all areas of the Vale of Glamorgan.

### **Statutory Process**

- 2.22** A consultation report must be published including a summary of comments received and the Council's response to these comments, at least two weeks prior to the publication of any statutory notice in accordance with paragraph 3.6 of 'the Code.'
- 2.23** The Council must then decide whether to proceed with the proposals within 26 weeks of the end of the period allowed for consultation responses. If following the consultation process the Council decides that the proposals are to be progressed, a statutory notice would be published providing 28 days for objections. The notice must be published on a school day and must include 15 school days (in addition to the day on which it is published).
- 2.24** If objections are received, an objection report must be published with a summary of the objections and the Council's response before the end of 7 days beginning with the day of its determination. Under the legislation as the proposal does not relate to sixth form education provision, the Local Authority can determine the proposals if objections are received.

## **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 2025-2030 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 - Creating Great Places to Live, Work and Visit
  - Objective 2 - Respecting and Celebrating the Environment
  - Objective 3 - Giving Everyone a Good Start in Life

- Objective 4 - Supporting and Protecting Those Who Need Us
- Objective 5 – Being the best Council, we can be

**3.3** The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, 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** This proposal meets the five ways of working by:

- Ensuring a more efficient financial model for ALN management in the Vale of Glamorgan.
- Ensuring a more equitable distribution of specialist resources across the Vale of Glamorgan.
- Improved provision available for pupils with a diagnosis a diagnosis of an autism spectrum condition and those experiencing significant social communication, interaction, or regulation difficulties. The proposal would support pupils to continue to access mainstream education with additional support.
- Providing capacity to in line with the demand.

**3.5** 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.

**3.6** This proposal meets 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 specialist provision is available to pupils attending Welsh medium schools.
- Delivering rigorous consultation with open communication channels and numerous opportunities for stakeholders to engage throughout the process

#### **4. Climate Change and Nature Implications**

- 4.1** There will be transport implications which cannot be determined until addresses of pupils are known, pupils can attend the SRB from all areas of the Vale of Glamorgan.
- 4.2** The SRB will be based within an existing vacant classroom and will provide access to outdoor learning environments. There are no other specific Climate Change and Nature Implications to this report.

#### **5. Resources and Legal Considerations**

##### **Financial**

- 5.1** No capital funding is required to ensure that the identified accommodation is suitable as capital works have been completed following an identification of the space for future use for ALN provisions as part of the Welsh Government Capital Grant for Additional Learning Needs. The implementation of the proposal does not require further amendments to either school.
- 5.2** The annual revenue cost of the special resource base at Holton primary school for the 2026/27 financial year is £142,000 which funds one teacher and two support staff. The school will also receive just under £5,000 via the mainstream funding formula to cover additional costs in relation to the pupils within the SRB such as resources.
- 5.3** Transport costs to the SRB are currently estimated at approximately £20,000 to £27,000 per annum. Transport costs can fluctuate considerably depending on the home address of the pupils attending the SRB therefore transport costs cannot be accurately forecast in the longer term. Pupils can attend the SRB from all areas of the Vale of Glamorgan.
- 5.4** The annual revenue cost of the Engagement service for the 2026/27 financial year is £1.35M after applying an efficiency saving of £99k to the current budget. The current budget is arrived at after combining the previous budgets for Y Bont resource base at High Street primary school, and the budgets previously delegated to Ysgol Y Deri in respect of the Early Intervention Base, St Joseph's Resource Base and the Y Deri Outreach and Engagement services. The revised £1.35M budget will be centrally retained and transferred to Ysgol Y Deri following sign up of a service level agreement

## **Employment**

- 5.5** A pilot provision has commenced at both schools in order to inform decision making in relation to the development of ALN specialist support. The creation of a new SRBs would require continuation of the staffing arrangements put in place for the pilot.
- 5.6** Any proposed future changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

## **Legal (Including Equalities)**

- 5.7** The Council is committed to meeting the requirements of the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018) in transforming expectations and outcomes for children and young people with additional learning needs (ALN). This provides a new statutory framework for supporting children with additional learning needs (ALN) and is accompanied by a mandatory Code which makes sure that the new system has a set of clear, legally enforceable parameters within which Local Authorities, schools, further education colleges and health services responsible for the delivery of services to children and young people with ALN must act. The aim of the new approach, as stated in the Code is as follows: To support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.
- 5.8** 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.
- 5.9** 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.
- 5.10** 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.

- 5.11** 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 Code”). The Council is to comply with the relevant provisions in connection with the proposals.

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

- 5.12** 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>
- 5.13** Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals.
- 5.14** 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.
- 5.15** 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 proposals 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 proposals.
- 5.16** If a Local Authority decides to proceed with proposals to make regulated alterations to a maintained school, it must publish proposals to that effect in accordance with the Code (section 48(1)). The proposals 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).
- 5.17** 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 proposals and its response to those objections before the end of 7 days beginning with the day of the Council’s determination.
- 5.18** 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**

### **5.19** 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.

### **5.20** 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

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

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

**5.22** 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 make 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.

**5.23** 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>

**5.24** The Act itself is available to view online:

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

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

### **(4) Equalities Act 2010**

**5.26** 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.

**5.27** 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**

**5.28** On 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.

**5.29** 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.

**5.30** 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.

**5.31** 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. This would, as appropriate, form



part of the full Equality Impact Assessment that was developed as part of the consultation process.

## **6. Background Papers**

None.

# DIRECTORATE OF LEARNING AND SKILLS CONSULTATION DOCUMENT

**CONSULTATION ON THE PROPOSAL TO CREATE  
NEW DELIVERY MODELS FOR ENHANCED &  
SUSTAINABLE SPECIALIST PROVISION.**



*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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# TABLE OF CONTENTS

<b>1. Introduction</b>	<b>1</b>
1.1. Background	1
1.2. The proposal	1
1.3. Responding to the proposal	1
<b>2. The Proposal</b>	<b>2</b>
2.1. Summary	2
2.2. What would this mean?	2
2.3. Why are we Proposing the Changes?	3
<b>3. Implications of Proposal</b>	<b>4</b>
3.1. School Information	4
3.2. Educational outcomes	4
3.3. Welsh language provision	7
3.4. Additional Learning Needs (ALN) provision	7
3.5. Impacts upon other schools	7
3.6. Admissions	8
3.7. Land and Buildings	8
3.8. Finance	9
3.9. Human Resources	10
3.10. Transport and learner travel arrangements	10
<b>4. Other Considerations</b>	<b>12</b>
4.1. Potential benefits of this proposal compared to the status quo	12
4.2. Potential disadvantages of this proposal compared to the status quo	12
4.3. Potential risks of this proposal and measures to mitigate identified risks	12
4.4. Equality Impact Assessment	13
4.5. Community Impact Assessment	13
4.6. Contributions To The Wellbeing Of Future Generations	14
4.7. Alternatives Considered	14
<b>5. The Statutory Consultation Process</b>	<b>15</b>
5.1. Key Dates	16
<b>6. Frequently Asked Questions (FAQS)</b>	<b>18</b>
<b>7. Involving Stakeholders and Responding To The Consultation</b>	<b>20</b>
7.1. Involving children in the consultation	21
7.2. How You Can Find Out More And Give Your Views	21

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8. Consultation Response Form .....	23
9. Vale of Glamorgan Equality Monitoring Form.....	28

## TABLE OF FIGURES

Figure 1: Image of Holton Primary School building (outside view) .....	9
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## LIST OF TABLES

Table 1: Previous NOR at Holton Primary School (data from PLASC) .....	8
Table 2: Projected demand at Holton Primary School (data from PLASC) .....	8
Table 3: Potential risks and mitigation measures .....	12
Table 4: Outline of the statutory consultation process .....	15
Table 5: Key dates of the process .....	17
Table 6: List of groups to consult as part of the consultation process .....	20

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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.

**‘ALP’** (Additional Learning Provision) is provided for learners who present with significantly greater difficulty in learning than the majority of others of the same age or have a disability for the purpose of the Equality Act 2010.

**‘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.

**‘EIB’** - Early Intervention Base

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

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**‘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.

**‘SEMH’** – social, emotional and mental health conditions leading to additional learning needs.

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

**‘Statemended’** - 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.

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# 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 8 September to 19 October 2025** on a proposal to create new delivery models for enhanced specialist ALN education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

In recent years the growth in ALN need has increased exponentially across our overall provision in specialist education, and there is a need to consolidate support to widen access to specialist support, training and interventions across all our schools. Information gathered suggests that due to an increase of pupils with social, emotional and mental health (SEMH), a more strategic approach is needed, to improve sustainability of our services for all of our pupils.

This consultation is in two parts:

- To establish a new English Medium specialist resource base at Holton Primary School with effect from 1 January 2026, or as soon as possible thereafter. A pilot provision is currently operating at the school in order to inform decision making.
- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.

This would mean a change to the existing provision currently provided at Y Bont. Y Bont is a resource base currently situated at High Street Primary School. This base acts as a centre of excellence for behavioural, emotional and social difficulties and provides a stimulating, rich environment and specialist staff to cater for children with SEMH needs on a full-time basis. Places are offered on a full-time basis with dual registration with their home school, and the base operates as a 'revolving door' with the expectation that following a period of intervention and specialist support, pupils will be able to leave the resource base and be reintegrated back into full time mainstream education. While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county.

## 1.2. THE PROPOSAL

This document outlines the Council's proposal to create new delivery models for enhanced and sustainable specialist education provision.

This proposal has been 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.

## 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 19 October 2025 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 create new delivery models for enhanced and sustainable specialist education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

This consultation is in two parts:

- To establish an English Medium specialist resource base at Holton Primary School with effect from 1 January 2026. A pilot provision is currently operating at the school in order to inform decision making.
- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.

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.

### 2.2. WHAT WOULD THIS MEAN?

#### **English Medium specialist resource base at Holton Primary School**

This aspect of the proposal would create specialist English medium educational provision for pupils aged 4-11 years. The purpose of this specialist resource would be to support individual learners as well as improve the capacity of the home school to create a fully inclusive environment where all learners are given the opportunity to succeed and have access to an education that meets their needs.

The Specialist Resource Base (SRB) would provide periods of integrated provision for pupils with a diagnosis of an autism spectrum condition and those experiencing significant social communication, interaction, or regulation difficulties. This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education. The team of specialist teachers and learning support assistants' would work together with the engagement service, occupational therapists, speech and language therapists, educational psychologists, and parents to provide learning experiences that cater for the education, communication, emotional, social and sensory needs of each pupil.

Pupils would be able to attend the SRB part time (2 days) whilst maintaining a supported place at their local mainstream school. Pupils in reception to year 2 will attend the base on a part time basis. These placements would enable pupils to continue to learn alongside and interact socially with their mainstream peers in their home school. The 2 provisions

would work together to remove barriers to on-going inclusion within the mainstream school and build its capacity to meet the pupil's future educational need.

These placements would provide specialist teaching and interventions alongside advice, mentoring and training for staff from the pupil's home school.

Placements would be agreed for a set period of two terms in the first instance. Regular reviews and assessment of all pupils take place to determine the most appropriate education provision to meet their needs. On agreement to place, the pupil would be dual registered at the base alongside their home school. The Vale of Glamorgan local authority will prepare and maintain Individual Development Plans for all pupils attending the SRB.

After two terms, assessment information will be considered at a local authority panel meeting to determine future placement requirements. It is anticipated that most learners would be able to return to full inclusion in their home school. In a few cases there may be a need to extend the SRB placement further. In such circumstances, termly reviews would be undertaken to monitor progress and findings considered at panel to determine future provision and placement.

### **To introduce an expanded model of the Local Authorities Engagement Service (ES)**

It is proposed that an expanded model of the Local Authorities engagement service model, currently being delivered by Ysgol Y Deri is put into place to leverage the existing Early Intervention Base (EIB) provision to achieve three main advantages:

#### **1. Prioritise early intervention and an equitable graduated response for pupils with SEMH needs in primary schools:**

- **Pilot an expanded model of EIB** to mirror the scope of the Engagement Service. Utilize the existing EIB building and resources at St Joseph's Primary School to provide part-time placements for pupils with SEMH difficulties and ND, social communication, interaction, and sensory regulation difficulties.
- **Develop two distinct, highly specialist ES teams** linked to the EIB to deliver enhanced outreach for pupils in Nursery to Year 1, building on the successful pilot of EIB Outreach+ during 2023-24.

#### **2. Prioritise early intervention and an equitable graduated response for the youngest pupils with SEMH within secondary schools:**

- **Develop a small secondary specialist ES team** to provide advice, support, and interventions for Year 7 pupils with SEMH and ND conditions, with or without a diagnosis. This would mirror ES support for primary schools and build on the successful pilot from 2023-25.

#### **3. Deliver specialist interventions for pupils in Year 3 to Year 6 within mainstream schools,** building on the successful work already taking place.

#### **4. Establish one specialist school for children with SEMH** at both primary and secondary levels. Outreach advice and support for schools with pupils in Year 8-11 would be delivered by Whitmore and Pencoedtre specialist resource base.

## 2.3. WHY ARE WE PROPOSING THE CHANGES?

The Council is committed to meeting the requirements of the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018) in transforming expectations and outcomes for children and young people with additional learning needs (ALN). This provides a statutory framework for supporting children with ALN and is accompanied by a mandatory Code which makes sure that the new system has a set of clear, legally enforceable parameters within which local authorities, schools, further education colleges and health services responsible for the delivery of services to children and young people with ALN must act. The aim of the new approach, as stated in the Code is as follows: To support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.

There is an identified trend in a growth and complexity of need in those requiring specialist provision across all of our schools. This is a nationwide trend. Data also indicates a rise in neuro diverse pupils with conditions such as autism and attention deficit hyperactivity disorder, there is also evidence of a clear increase in children and young people being identified as having issues relating to their social, emotional and mental health needs.

While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county. Financial pressures both at a school and Local Authority level also play a significant role in terms of the sustainability of the provision, and more leverage on supporting mainstream schools on teaching and learning and inclusive practice are needed to manage the demand, upskill and coordinate a regional approach to supporting SEMH challenges in schools, to ensure consistency of practice, accessibility and the impacts on local schools are as equitable as possible.

## 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 the schools referenced in this proposal.

### 3.2. EDUCATIONAL OUTCOMES

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#### STANDARDS AND PROGRESS

##### **Holton Provision**

The English Medium specialist resource base at Holton Primary School would deliver specialist educational provision for pupils aged 4-11 years. The purpose of this specialist resource would be to support individual learners as well as improve the capacity of the home school to create a fully inclusive environment where all learners are given the opportunity to succeed and have access to an education that meets their needs. 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 sector, 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.

The last Estyn Inspection report for Holton Primary School in 2019 identified that the school's performance was good *"Pupils at Holton Primary enjoy coming to school and make good progress in the development of their skills and knowledge over time. Staff plan and deliver interesting learning experiences that engage and motivate most pupils. They have high expectations of pupils and maintain a positive, encouraging working relationship with them. The school's support for the development of pupils' skills in literacy and numeracy is strong. Staff ensure frequent opportunities for pupils to apply and develop these skills further in their work across the curriculum."*

##### **Engagement Service (Ysgol Y Deri)**

Ysgol Y Deri was last inspected in February 2025. Estyn concluded that *"Ysgol y Deri provides an aspirational curriculum that is broad, balanced and purposeful. It offers engaging and meaningful experiences in real-life contexts, leading to valuable accreditation where appropriate. As a result most pupils thrive within the school and make strong progress. Further, pupil voice sessions ensure that pupils actively contribute to the planning of their learning, incorporating their interests, motivations and what is important to them."*

The Council gives 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.

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## WELLBEING AND ATTITUDES TO LEARNING

### Holton Provision

The SRB at Holton would provide periods of integrated provision for pupils with a diagnosis of an autism spectrum condition and those experiencing significant social communication, interaction, or regulation difficulties. This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education.

At the last inspection in 2019, Estyn identified that wellbeing and attitudes to learning at Holton were Good. *"Nearly all pupils enjoy school and feel safe and secure. Their behaviour in lessons, around the school and at playtimes is exemplary. They show care and respect for one another and contribute greatly to the nurturing ethos of the school. For example, older children act as mentors on the school yard to provide support for younger pupils. Most pupils understand clearly the importance of eating healthily and engaging in regular exercise. They develop their fitness and mental wellbeing successfully by taking part in daily activities such as skipping, running, mindfulness and dance..... Nearly all pupils have a positive attitude towards their learning. They are capable learners who take pride in their work and want to do well."*

### Engagement Service (Ysgol Y Deri)

Estyn reported that *"the school's vision is securely rooted in the values of 'potential, opportunity and achievement'. The culture permeates every aspect of the school's life and work across its extensive and varying range of provisions. Ysgol y Deri is a happy and nurturing community. Teaching and therapeutic staff collaborate exceptionally well to provide high levels of care, support and guidance for pupils, which enables most pupils to make strong progress across all areas of learning at the school. Pupils feel safe and valued and build strong and trusting relationships with staff. Leaders place the well-being and outcomes of pupils at the heart of everything that they do. They set high expectations and aspirations for their pupils. Across the school, pupils are warm and nurturing toward their peers and staff, and many engage confidently and enthusiastically with visitors. There is a clear sense of community and mutual respect within lessons and wider school experiences. This is a strength of the school. Further, leaders and staff support and encourage families well and foster beneficial working relationships with parents and carers, for example through regular parent and carer workshops. This provides families with helpful information about how best to support their children."*

Access to an outdoor area is important within the proposed facilities; there would be children with ALN 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 regulate, develop play and language skills. There would be a range of outdoor activities available.

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## TEACHING AND LEARNING EXPERIENCES

### Holton Provision

Teaching and Learning experiences were also found to be Good. *“Many teachers have high expectations of pupils and provide a good range of learning experiences that interest and engage pupils well. They ensure that tasks build successfully on pupils’ existing knowledge and skills. This helps to motivate pupils well and maintain their interest in learning. Many teachers ask purposeful questions that help to develop pupils’ understanding and to extend their thinking. Teachers and learning support assistants provide good role models for pupils’ behaviour and language. Staff greet each other with courtesy and treat adults and pupils with respect. This helps to create a calm and purposeful learning environment”.*

### Engagement Service (Ysgol Y Deri)

Leaders and staff have secured a wide range of high-quality specialist provisions and interventions that successfully support all pupils. For example, the school’s ‘Launchpad’ provision offers highly engaging approaches to encourage pupils to interact with and develop trust in adults as well as support their emotional regulation., Staff use role-play gaming, radio, and animation projects effectively to build pupils’ confidence and self-esteem. Parents and carers value this provision and comment that it has a life-changing impact on their child. Pupils are prioritised for this support based on need, and they continue in the programme until significant progress is made in their emotional regulation. Importantly, pupils can return to ‘the Launchpad’ should they need to reengage with trusted adults at a later stage.

Both provisions would provide a specialist 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 facility at Holton was developed as part of a Welsh Government Capital Funding Grant to Support Learners with Additional Learning Needs. The proposed new SRB 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. Being able to provide opportunities to develop communication skills through play is crucial.

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## CARE, SUPPORT AND GUIDANCE

### Holton Provision

Estyn concluded that Holton Primary school's *"focus on ensuring that pupils attain high levels of emotional and physical wellbeing is central to its inclusive ethos. Staff know pupils well and use this knowledge to put in place highly effective provision that raises pupil's self-esteem and confidence significantly. This helps nearly all pupils to engage with school life successfully. Provision for pupils with special educational needs is effective. Highly trained staff provide a range of beneficial intervention programmes to support and develop pupils' basic skills. The school works well with outside agencies, such as speech and language and medical services, to provide valuable support for pupils with specific needs and their families."*

### Engagement Service (Ysgol Y Deri)

The school has established a clear and well-defined approach to delivering its provision, effectively meeting the needs of each pupil. Leaders and staff have secured a wide range of high-quality specialist provisions and interventions that successfully support all pupils. Ysgol y Deri maintains a wide range of effective partnerships with health professionals and external agencies, which significantly enhance the support available to pupils. Across all settings, staff foster positive relationships with pupils, creating a calm and supportive learning environment. Pupils enjoy learning and participate enthusiastically. The behaviour and engagement of pupils throughout the school are exemplary. Well established routines, such as structured play, transitions, and sensory approaches, effectively support pupils' engagement and regulation

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## LEADERSHIP AND MANAGEMENT

### Holton Provision

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 Holton Primary School to ensure the SRB is able to operate within the school framework.

Senior leaders at Holton develop effective processes to support the work of the school. For example, the school's arrangements to identify and support vulnerable pupils are highly effective. Senior leaders are beginning to collaborate effectively with staff to maintain and improve the quality of provision. However, systems of communication between leaders and staff are not sufficiently clear. Similarly, school systems do not ensure consistently that all staff are aware of decisions and the opportunity they have to contribute to them. Leaders consider and address national priorities well. For example, they work successfully to reduce the impact of poverty on pupils' attainment through effective nurture provision. They ensure that suitable ICT resources and schemes of work are in place to implement the Digital Competency Framework. Welsh language provision

### Engagement Service (Ysgol Y Deri)



The headteacher clearly articulates a clear vision for the school, across its extensive and varied provisions. Despite the significant challenges posed by the school's rapid and recent expansion by the local authority, the headteacher provides calm, sensitive and purposeful leadership. He is very ably supported by both senior and middle leaders. Together they work effectively and cohesively to sustain a school where pupils are happy and make strong progress in their learning including their social, emotional and communication skills. Leadership, including shared leadership at all levels, is a notable strength of the school. At Ysgol y Deri, leaders provide assured strategic direction under the headteacher's leadership. They secure this successfully through a clearly defined staffing structure and a range of beneficial processes such as well-planned and focused leadership meetings, high quality professional development and robust performance management.

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## WELSH LANGUAGE

### Holton Provision

Although Holton Primary School teaches predominately through the medium of English, Welsh language is part of the curriculum contributing to the Council's commitment to encouraging bilingual speakers. Estyn concluded that Holton Primary School *"place a high priority on developing the Welsh language skills of key staff in order that they can raise standards among pupils."*

### Engagement Service (Ysgol Y Deri)

Pupils engage positively with the Welsh language in a range of contexts. They write about hair and eye colour in Welsh, use incidental Welsh where appropriate, and confidently repeat modelled phrases. Where appropriate, bilingual pupils benefit from the support of a Welsh-speaking teaching assistant, enabling them to communicate effectively. However, overall, the school's provision for Welsh first-language pupils is underdeveloped.

## 3.3. ADDITIONAL LEARNING NEEDS (ALN) PROVISION

There would be a positive impact regarding ALN as the proposal would result in an improved and sustainable delivery model to provide periods of integrated provision for pupils with a diagnosis of an autism spectrum condition and/or those experiencing significant social communication, interaction, or regulation difficulties. This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education.

- A key role of the new provisions would be to support the implementation of school-wide policies and procedures to strengthen support available to all pupils at Holton Primary School and the Engagement Service.



- Both schools have 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 schools work closely with external agencies to support vulnerable learners. The schools have prepared staff well for the changes under the new ALN Act.

### 3.5 RESOURCE BASE ENTRANCE CRITERIA

To access the Specialist Resource Base there must be a clear description of the pupil's difficulties.

This means the pupil must:

1. Have had their primary need diagnosed by an NHS health professional as an autism spectrum condition or;
2. Have significant evidence of social communication, interaction, anxiety, or regulation difficulties identified as their primary need or;
3. Have been identified as having an additional learning need requiring additional learning provision.
4. Have their placement agreed by Additional Learning Provision (ALP) Panel

ALP is provided for learners who present with significantly greater difficulty in learning than the majority of others of the same age or have a disability for the purpose of the Equality Act 2010, which prevents or hinders them from making use of facilities for education or training of a kind generally provided for others of the same age in mainstream maintained settings. They are likely to demonstrate multiple or significant ongoing needs that cannot be met within Universal Learning Provision and continue to have significant need despite early intervention.

Evidence will need to be shared with the LA and demonstrate the following:

- The child/young person has been an active participant in making decisions about their additional learning provision (ALP) in school, and their views and wishes have been appropriately sought and listened to.
- The child/young person has been involved in preparing and reviewing their Individual Development Plan and clear efforts have been made to ensure that the child/young person understands the purpose of all interventions and support.
- Parents/carers have been active participants in the planning of the child's Individual Development Plan and additional learning provision.
- Parents have been given appropriate information about the purpose of interventions and support.

- Consultation with regards to appropriate ALP has been sought from relevant professionals and advisory services.
- The school has prepared and maintained an Individual Development Plan, including appropriate objectives and associated ALP, which have been regularly and robustly reviewed in respect of the progress made in response to support.

There is evidence of:

- High quality differentiated teaching;
- Targeted interventions appropriate to support the child's individual objectives;
- School has liaised with LA Specialist Services
- Review of targets and impact of interventions over time;
- Evaluation.

5. Would benefit from a period of integrated intensive support in an adapted environment for one or more of the following reasons, to:

- Develop social communication skills.
- Develop social interaction and flexible thinking skills.
- Learn to use structured teaching supports.
- Learn to use self-regulation strategies

6. Have had the placement agreed by the Local Authority Placement Panel.

## **Specialist Resource Base**

### **Exit Criteria.**

Placements will be agreed for a set period of two terms in the first instance. Placements are not intended to be long term and regular reviews and assessment of all pupils take place to determine the most appropriate education provision to meet their needs.

After the initial placement, assessment information will be considered at a local authority panel meeting to determine future placement requirements. Some pupils will be able to return to full inclusion in their home school after this.

## **1.1. IMPACTS UPON OTHER SCHOOLS**

This proposal has been designed to respond to the growth in ALN need which has increased exponentially across our overall provision and as such will have a positive impact on other schools by delivering an improved provision for pupils with ALN.

## 1.2. ADMISSION ARRANGEMENTS

All admissions to both provisions would be via Local Authority Panel.

## 1.3. LAND AND BUILDINGS

Holton Primary School is an existing school with associated buildings. Overhead costs in relation to running the SRB are included in the schools budget allocation. Following extensive improvements funded by the Welsh Government Capital Grant for Additional Learning Needs, an area of the building has been remodelled and refurbished to support the provision of ALN education. If this proposal is successful, this area would be permanently allocated for the SRB unit.

**Figure 1: Image of Holton Primary School building (outside view)**



Holton Primary School 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, and habitat areas to enhance pupil wellbeing.

The SRB would be accommodated within the newly renovated 'caretakers house' with access to outdoor space. Staff would utilise the existing staff room within Holton Primary School to help foster a strong connection between the SRB and Holton Primary School improving integration.

The proposed new location would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21<sup>st</sup> 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.

St Joseph Primary School comprises a main building, a recently constructed building to support early years provision, on a site overall, of a good size. If this proposal is successful, this area would be permanently allocated for the Early intervention Base unit.

**Figure 2: Image of St Josephs Primary School building (outside view)**



The school benefits from suitable sized classrooms, a main hall for sport and dining, offices for headteacher and administration and staffroom. The school is safely secured with intercom access for visitors. Within the grounds, there are external play areas to enhance pupil wellbeing.

The EIB would continue to be accommodated within its existing location, with access to outdoor areas. Staff facilities and spaces would remain as they are currently, to help foster a strong connection between the EIB and St Joseph's school improving integration.

The location provides:



- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21<sup>st</sup> Century
- Unobstructed access between all internal areas for children and staff
- Enhanced safeguarding and site security for pupils and staff
- Access to outdoor facilities for ALN pupils
- Specialist provision to provide a curriculum that best meets the needs of learners

## 1.4. FINANCE

### CAPITAL FUNDING

No additional capital funding is required to ensure that the identified accommodation is suitable as Capital works have been completed following an identification of the space for future use for ALN provisions as part of the Welsh Government Capital Grant for Additional Learning Needs. The implementation of the proposal does not require further amendments to the Holton Primary School building.

### REVENUE FUNDING

- **Holton Road Resource base budget 2025/26** - The proposed annual staffing budget of the Holton Primary School resource base for the 2025/26 financial year is £136,161 which is centrally retained within the Learning and Skills Directorate. A further £4,913 is delegated to Holton Primary school within the schools funding formula with respect to overhead costs.
- **Engagement service** – The new engagement service will cost £1,381,543 annually and will be funded from combining the budget allocations of the current engagement service, with the current budget allocations for the early intervention base, the special resource unit at St Joseph's primary school and the budget for the resource base at High Street (Y Bont).
- The 2025/26 budget for the current engagement service of £765,402 was delegated to Ysgol Y Deri within the special school's funding formula.
- The 2025/26 budget for the Early Intervention base of £226,418 was also delegated to Ysgol Y Deri within the Special schools' funding formula to fund 2 teachers and 2 LSAs to staff the unit.
- The 2025/26 budget for the SRB at St Joseph's primary school of £144,401 was also delegated to Ysgol Y Deri within the Special schools' funding formula to fund 1 teacher and 2 LSAs to staff the resource base.
- The 2025/26 budget for the Y Bont special resource unit at High Street primary school was £245,322 which was delegated to High Street primary school to fund 1 teacher and 5 LSAs. High Street primary would have already funded the costs of these staff from April to August by the time the new provision is opened, and therefore 5/12ths of this funding (£102,218) for the 2025/26 financial year will remain within the High Street school budget. The remaining 7/12ths of this funding (£143,104) will be transferred from the High Street budget to the Y Deri budget for

2025/26. The total budget for 2026/27 for this service will be transferred to Ysgol Y Deri to fund the total expanded engagement.

- For the 2025/26 financial year, the total budget available for the new engagement service is £1,279,325 this has an annual equivalent of £1,381,543.

## 1.5. HUMAN RESOURCES

### **English Medium specialist resource base at Holton Primary School**

A pilot provision has commenced at Holton Primary School in order to inform decision making in relation to the development of ALN specialist support. The creation of a new SRB would require staffing continuation of these 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 Holton Primary School to ensure the SRB is able to operate within the school framework.

The SRB area at Holton Primary School would accommodate up to 16 learners. It is proposed that the base is established from January 2026 or as soon as possible thereafter. Staff currently employed at the pilot provision would continue to support learners within the SRB.

### **To introduce an expanded model of the Local Authorities engagement service**

The current base (Y Bont) at High Street offers 8 places on a pupil / staff ratio of 1:1/2. There is one qualified teacher and 5 support staff (2 HTLA & 3 LSA Level 3+). Staff of Y Bont are employed by the school to meet the needs of the base. Consequences of the new pilot starting are that the school/GB will need to consider its staffing requirements. Any proposed future changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

The support for the pupils in Y Bont would not fall to the school as this support would be delivered by a different provision.

## 1.6. 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 2 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 may 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.

## 2. OTHER CONSIDERATIONS

### 2.1. POTENTIAL BENEFITS OF THIS PROPOSAL COMPARED TO THE STATUS QUO

The Council:

- Provides additional targeted support and learning provision for pupils attending primary schools whose needs are considered to be at the appropriate level to access enhanced provision
- Provides an improved learning environment which is adaptable to change and will challenge and support children to reach their full potential.
- Provides opportunities for professional development throughout our Primary Schools.
- Ensures that pupils with pupils with a specific learning need or diagnosis can have appropriate ALP met within the local authority and can be supported to remain in their mainstream school.
- Contributes to the Council's strategy of ensuring sustainable education models
- Ensuring increased capacity across the Vale for pupils requiring ALP
- Some staff and pupils would have less distance to travel.

### 2.2. 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 services would operate initially as a Pilot project, this would be minimal.
- High Street and Ysgol Y Deri would need to consider implications for their staff structure and budget.
- Some staff and pupils will have further to travel.

### 2.3. POTENTIAL RISKS OF THIS PROPOSAL AND MEASURES TO MITIGATE IDENTIFIED RISKS

**Table 3: Potential risks and mitigation measures**

Risk	Mitigation
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Inadequate specialist provision for pupils with ALN.	The proposed changes would be able to provide a specialised learning environment to deliver integrated provision for pupils. The facilities available at the new locations are appropriate for 21 <sup>st</sup> century learning.
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## 2.4. 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.

## 2.5. COMMUNITY IMPACT ASSESSMENT

A Community Impact Assessment has been undertaken to determine any impacts this proposal would have on the local community. In recent years the growth in ALN need has increased exponentially across our overall provision in specialist education, and there is a need to consolidate support to widen access to specialist support, training and interventions across all our schools. Information gathered suggests that due to an increase of pupils with social, emotional and mental health (SEMH), a more strategic approach is needed, to improve sustainability of our services for all of our pupils. The proposal is to create new delivery models for enhanced and sustainable specialist education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

The impact assessment identifies that the proposal would likely have a neutral impact on the local community across 6 of the 8 measures assessed and a positive impact on 2 of the 8 measures. Overall, the proposal would likely have a positive impact on the local community.

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

The full Community Impact Assessment can be viewed on the consultation page.

## 2.6. 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 does not form part of the statutory consultation process but was considered beneficial to meeting the spirit of the Act.

## 2.7. ALTERNATIVES CONSIDERED

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**OPTION 1: DO NOT CREATE A SRB AND CONTINUE TO PROVIDE SUPPORT TO PUPILS WITHIN THEIR HOME SCHOOL.**

### **Why was this option discounted?**

This would not respond to the volume of need or sustainability of provision

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**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 or would have required extensive capital cost to provide the SRB on site. Consequently it was considered Holton Primary School represented the most cost effective option which provided improved facilities and an enhanced learning environment.

### 3. THE STATUTORY CONSULTATION PROCESS

**Table 4: Outline of the statutory consultation process**

Steps	Description
<b>Step 1: Develop a proposal</b>	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.
<b>Step 2: Cabinet consideration</b>	The Council's Cabinet to consider the proposal and approval to consult.
<b>Step 3: Consultation</b>	<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><b>The consultation period for this proposal starts on 8 September 2025 – 19 October 2025.</b></p> <p>Within 13 weeks of 19 October 2025 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>
<b>Step 4: Consultation response report</b>	Feedback submitted during the consultation period will be considered and a response report will be developed and presented to Cabinet for consideration.
<b>Step 5: Cabinet consideration</b>	In November 2025, 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.
<b>Step 6: Statutory notice</b>	<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 of Holton Primary School. Copies of the notice would be distributed to pupils, parents, guardians, and staff members. The school may also distribute</p>

	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.
<b>Step 7: Objection period</b>	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.
<b>Step 8: Objection report</b>	Under section 49 of the School Standards and Organisation (Wales) Act 2013 when objections have been received proposers <b>must</b> publish a summary of the statutory objections and the proposer's response to those objections ("the Objection Report").
<b>Step 9: Cabinet consideration</b>	<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>
<b>Step 10: Decision letter</b>	<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>

### 3.1. 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**

<b>Statutory Process</b>	<b>Timescale</b>
Issue consultation document	<b>8 September 2025</b>
Closing date for views on the proposals	<b>19 October 2025</b>
Consultation report considered by Cabinet and published on the Council's website	<b>November 2025</b>
Subject to Cabinet approval, Statutory notice issued during which time formal written objections will be invited	<b>December 2025</b>
End of Statutory Notice Period	<b>January 2026</b>
Determination by Cabinet with objection report.	<b>February 2026</b>
Decision notification	<b>February 2026</b>
Proposal implemented	<b>February 2026</b>

The proposed timetable may be subject to change.

## 4. FREQUENTLY ASKED QUESTIONS (FAQS)

### *What is the intended timescale of the proposal?*

The proposal will be piloted in the autumn term 2025 and if following consultation an cabinet determination the proposal is successful, it will be in place with effect from January 2026.

### *How would pupils be allocated a place ?*

The Council would allocate pupils to both provisions through the ALP Panel process in consultation with the leadership of the SRB at Holton Primary School and the Engagement Service. This would be based on an assessment of the evidence of the individual needs of the pupils and their barriers to learning and appropriate ALP.

### *Who would manage and support learners attending these provisions?*

Holton Primary School and the Engagement Service would receive additional funding to ensure there are no additional costs in hosting the provision. The purpose of these provisions is to provide additional support to pupils to ensure they can access mainstream education.

### *How will pupils access these provisions?*

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

However, consideration will be given to 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.

Holton Primary School 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 Holton Primary School?*

Holton Primary School 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 a newly refurbished vacant area, which was previously the caretakers house in the school. As these rooms have not been previously available to pupils, this will not detract from their learning environment.

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

## 5. 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 High Street, Holton Primary School. St Joseph's and Ysgol Y Deri	Governing Bodies of High Street, St Joseph's, Holton Primary School and Ysgol Y Deri
Parents/Carers and Guardians of children at all Vale schools	Directors of Education – All Neighbouring Authorities
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	



## 5.1. 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 impacted by this proposal should be given the opportunity to make their views known about this proposal.

It is intended that a consultation workshop will be held with affected pupils to gather their views about the proposal where appropriate. 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.

## 5.2. HOW YOU CAN FIND OUT MORE AND GIVE YOUR VIEWS

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### 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](mailto:sustainablecommunitiesforlearning@valeofglamorgan.gov.uk) for further information on the proposal.

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### GIVE YOUR VIEWS

The consultation period will run from **8 September to 19 October 2025**. 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:  
Creation of new delivery models for improved specialist ALN education provision.  
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 19 October 2025. 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](#).

## 6. 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**

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Please return the form to the postal address:

Consultation on the creation of new delivery models for improved specialist ALN education provision

The Vale of Glamorgan Council

Civic Offices,

Holton Road

Barry CF63 4RU

**The closing date for responses to this consultation is 19 October 2025.**

**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.

<b>Your Full Name:</b>	
<b>Postcode:</b>	

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

<b>*Please confirm which school/s you are affiliated with:</b>	
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<b>1. Do you support the proposal to open a specialist resource base at Holton Primary School in April 2025?</b>					
Yes		No		No opinion either way	
<b>Please explain why:</b>					

**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 **19 October 2025.**

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

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



## 7. 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):	
<b>Mixed/multiple ethnic groups</b>			
<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):			
<b>Asian/Asian British</b>			
<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):			
<b>Black/African/Caribbean/Black British</b>			
<input type="checkbox"/> African		<input type="checkbox"/> Caribbean	
<input type="checkbox"/> Any other Black/African/Caribbean background (please specify):			
<b>Other ethnic group</b>			
<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"/>
<b>Sexual Identity</b>				
<b>Which of the following options best describes how you think of yourself?</b>				
<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			
<b>Religion</b>				
<b>What is your religion?</b>				
<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	
<b>Pregnancy and Maternity</b>				
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			
<b>Marriage and Civil Partnership</b>				
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"><li><input type="checkbox"/> Widowed</li><li><input type="checkbox"/> In a registered same-sex civil partnership and living with your partner</li><li><input type="checkbox"/> Separated, but still legally in a same-sex civil partnership</li><li><input type="checkbox"/> Formerly in a same-sex civil partnership which is now legally dissolved</li><li><input type="checkbox"/> Surviving partner from a same-sex civil partnership</li><li><input type="checkbox"/> Prefer not to say</li></ul>
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# DIRECTORATE OF LEARNING AND SKILLS CONSULTATION DOCUMENT

CONSULTATION ON THE PROPOSAL TO  
CREATE NEW DELIVERY MODELS FOR  
ENHANCED & SUSTAINABLE SPECIALIST  
PROVISION.



*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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## TABLE OF CONTENTS

1. Background.....	1
2. Outline of the consultation process .....	4
2.1. Publication of the consultation .....	4
2.2. Consultation stakeholder engagement .....	4
2.3. Late Representations .....	5
2.4. Consultation Questions .....	5
3. Consultation responses .....	6
3.1. Summary of responses .....	6
3.2. Responses to the Proposal .....	7
4. Conclusion .....	8
4.1. Quality and standards in education .....	8
4.2. Community impact.....	9
4.3. Travel arrangements .....	10
5. Annex A - A summary of key issues raised by statutory consultees .....	10
5.1. Issues raised in relation to the proposal: .....	10
Theme 1.....	10
Theme 2.....	11
Theme 3.....	11
6. Annex B - A summary of comments received in favour of the proposal .....	13
Theme 4.....	13
Theme 5.....	14
7. Annex C - Frequently asked questions. ....	14
8. Annex D - Response from Estyn.....	15

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## 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 8 September to 19 October 2025** on a proposal to create new delivery models for enhanced specialist ALN education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

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.

### PROPOSAL: CONSULTATION ON THE PROPOSAL TO CREATE NEW DELIVERY MODELS FOR ENHANCED & SUSTAINABLE SPECIALIST PROVISION.

The proposal is to create new delivery models for enhanced and sustainable specialist education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

This consultation was in two parts:

- To establish a new English Medium specialist resource base at Holton Primary School with effect from 1 January 2026, or as soon as possible thereafter. A pilot provision is currently operating at the school in order to inform decision making.
- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.

#### **English Medium specialist resource base at Holton Primary School**

This aspect of the proposal would create specialist English medium educational provision for pupils aged 4-11 years. The purpose of this specialist resource would be to support individual learners as well as improve the capacity of the home school to create a fully inclusive environment where all learners are given the opportunity to succeed and have access to an education that meets their needs.

The Specialist Resource Base (SRB) would provide periods of integrated provision for pupils with a diagnosis of an autism spectrum condition and those experiencing significant social communication, interaction, or regulation difficulties. This will

include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education. The team of specialist teachers and learning support assistants' would work together with the engagement service, occupational therapists, speech and language therapists, educational psychologists, and parents to provide learning experiences that cater for the education, communication, emotional, social and sensory needs of each pupil.

Pupils would be able to attend the SRB part time (2 days) whilst maintaining a supported place at their local mainstream school. Pupils in reception to year 2 will attend the base on a part time basis. These placements would enable pupils to continue to learn alongside and interact socially with their mainstream peers in their home school. The 2 provisions would work together to remove barriers to on-going inclusion within the mainstream school and build its capacity to meet the pupil's future educational need.

These placements would provide specialist teaching and interventions alongside advice, mentoring and training for staff from the pupil's home school.

Placements would be agreed for a set period of two terms in the first instance. Regular reviews and assessment of all pupils take place to determine the most appropriate education provision to meet their needs. On agreement to place, the pupil would be dual registered at the base alongside their home school. The Vale of Glamorgan local authority will prepare and maintain Individual Development Plans for all pupils attending the SRB.

After two terms, assessment information will be considered at a local authority panel meeting to determine future placement requirements. It is anticipated that most learners would be able to return to full inclusion in their home school. In a few cases there may be a need to extend the SRB placement further. In such circumstances, termly reviews would be undertaken to monitor progress and findings considered at panel to determine future provision and placement.

### **To introduce an expanded model of the Local Authorities Engagement Service (ES)**

It is proposed that an expanded model of the Local Authorities engagement service model, currently being delivered by Ysgol Y Deri is put into place to leverage the existing Early Intervention Base (EIB) provision to achieve three main advantages:

#### **1. Prioritise early intervention and an equitable graduated response for pupils with SEMH needs in primary schools:**

- **Pilot an expanded model of EIB** to mirror the scope of the Engagement Service. Utilize the existing EIB building and resources at St Joseph's Primary School to provide part-time placements for pupils with SEMH difficulties and ND, social communication, interaction, and sensory regulation difficulties.
- **Develop two distinct, highly specialist ES teams** linked to the EIB to deliver enhanced outreach for pupils in Nursery to Year 1, building on the successful pilot of EIB Outreach+ during 2023-24.

**2. Prioritise early intervention and an equitable graduated response for the youngest pupils with SEMH within secondary schools:**

- **Develop a small secondary specialist ES team** to provide advice, support, and interventions for Year 7 pupils with SEMH and ND conditions, with or without a diagnosis. This would mirror ES support for primary schools and build on the successful pilot from 2023-25.

**3. Deliver specialist interventions for pupils in Year 3 to Year 6 within mainstream schools,** building on the successful work already taking place.

**4. Establish one specialist school for children with SEMH** at both primary and secondary levels. Outreach advice and support for schools with pupils in Year 8-11 would be delivered by Whitmore and Pencoedtre specialist resource base.



## 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 Council to hear the views of all those with an interest.

### 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 8<sup>th</sup> September 2025. 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 High Street, Holton Primary School. St Joseph's and Ysgol Y Deri	Governing Bodies of High Street, St Joseph's, Holton Primary School and Ysgol Y Deri
Parents/Carers and Guardians of children at all Vale schools	Directors of Education – All Neighbouring Authorities
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	

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:

[Delivery Models for Enhanced and Sustainable Specialist Provision](#)

### 2.3. LATE REPRESENTATIONS

The closing date for the consultation was the 19<sup>th</sup> October 2025. No late representations were received.

### 2.4. CONSULTATION QUESTIONS

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

**1) Do you support the proposal to Create New Delivery Models for Enhanced & Sustainable Specialist Provision?**

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

**If you support or do not support the proposal, then please explain why.**

**If you support or do not support the proposal, then please explain why.**

**Any other comments?**

### 3. CONSULTATION RESPONSES

The consultation responses received in writing between 8<sup>th</sup> September to 19<sup>th</sup> October 2025 are outlined below.

#### 3.1. SUMMARY OF RESPONSES

4 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**

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

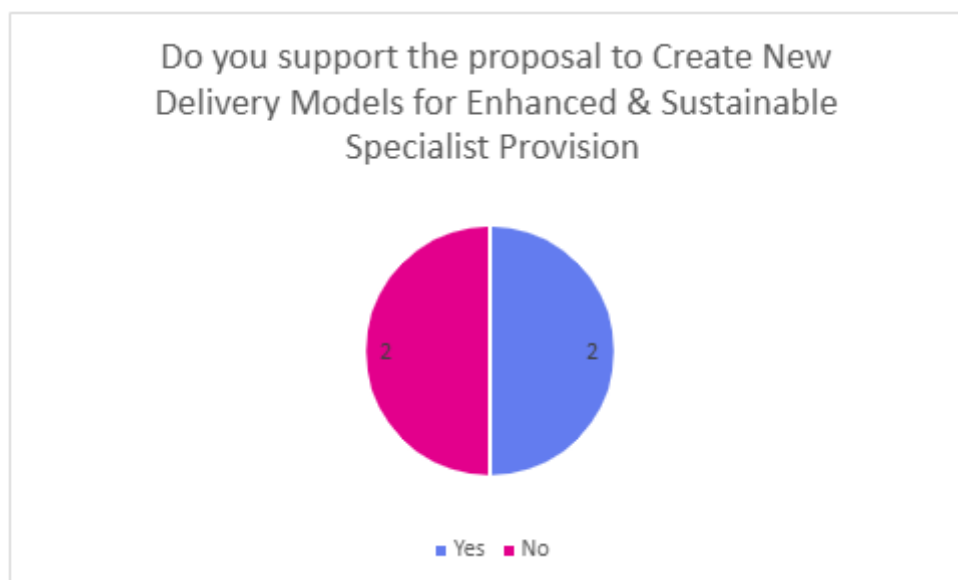
### 3.2. RESPONSES TO THE PROPOSAL: TO CREATE NEW DELIVERY MODELS FOR ENHANCED & SUSTAINABLE SPECIALIST PROVISION.

As Table 3 and Chart 1 below show, responses were split 50% in favour of the Proposal and 50% against the proposal.

**Table 3: Breakdown of consultation responses**

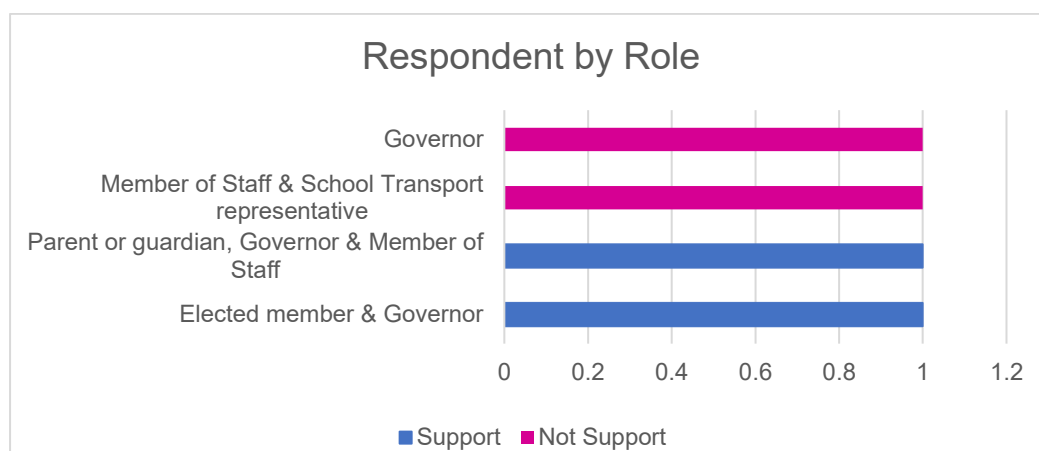
Total (individual) responses:	Total support		Total not support	
No.	No.	%	No.	%
4	2	50%	2	50%

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



As illustrated in Table 4, the respondents held multiple roles, with the majority occupying two or more positions.

**Table 4: Breakdown of consultation responses by role**



Regarding responses affiliated with schools 1 respondent is a member of staff and Governor. 3 respondents identified as governors. The remaining respondents was a representative from School Transport.

## 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

The most recent Estyn inspection of Holton Primary School (2019) recognised the school's inclusive ethos and positive well-being outcomes but identified two areas for further development: strengthening transitions between phases and improving consistency in provision for pupils with additional learning needs. The proposed SRB provides a timely opportunity to address these issues by enhancing staff expertise and coherence in ALN provision. The local authority should confirm how it has reassured itself that appropriate action has been taken to address these inspection findings, and how the SRB will build upon the school's ongoing improvement work.

*The report suggested the following recommendations:*

- R1 Improve systems of communication between staff and leaders
- R2 Improve attendance
- R3 Provide opportunities for pupils to work independently and direct their own learning in the foundation phase
- R4 Review the effectiveness of assessment for learning strategies

## Engagement Service (Ysgol Y Deri)

Ysgol Y Deri was last inspected in February 2025. Estyn concluded that “*Ysgol y Deri provides an aspirational curriculum that is broad, balanced and purposeful. It offers engaging and meaningful experiences in real-life contexts, leading to valuable accreditation where appropriate. As a result most pupils thrive within the school and make strong progress. Further, pupil voice sessions ensure that pupils actively contribute to the planning of their learning, incorporating their interests, motivations and what is important to them.*” The report suggested the following recommendations:

R1. Continue to improve the attendance of specific groups of pupils at the school

R2. Sharpen development planning, focusing clearly and consistently on the impact of whole-school priorities and initiatives on pupil outcomes

In Estyn’s response to the consultation, they concluded that the proposal is likely to at least maintain and improve educational standards in the Vale of Glamorgan. And that it has clear potential to enhance the local authority’s capacity to meet the growing needs, particularly those pupils with social, emotional and mental health (SEMH) and neurodiverse profiles. The planned Specialist Resource Base (SRB) at Holton Primary School and the expanded Engagement Service at Ysgol y Deri are based on established and effective practice and provide a balanced, sustainable response to rising demand. Governance, funding and implementation arrangements are coherent, and the proposal aligns well with national ALN reforms, making effective use of existing resources to improve outcomes and well-being for learners. Estyn’s response did note some areas of the consultation document which required the proposer to expand on the information provided. The response to these concerns is outlined under the relevant themes under Section 5.

Overall, it is concluded that the proposal would likely have a positive impact through:

- Improving equity of access to specialist support.
- Enhancement to the quality of teaching for ALN learners and to strengthen inclusive pedagogy across the wider school system.
- Expanding the authority’s capacity to support emotional regulation, resilience and inclusion across settings.

### 4.2. COMMUNITY IMPACT

A detailed Community Impact Assessment was conducted, evaluating eight key measures such as school catchment access, community services, infrastructure, and employment. The assessment found positive impacts in two areas—local pupils attending their catchment school and continued community services—and neutral impacts across the remaining six measures. No negative effects were identified. The proposals are expected to have a broadly positive effect on the local community, supporting both educational outcomes and equitable access to specialist support.

The proposed changes represent a strategic response to increasing complexity and demand in ALN provision. By leveraging existing resources and piloting new models, the Council aims to ensure long-term sustainability and improved outcomes for children and young people across the Vale of Glamorgan.

The impact assessment identifies that the proposal would likely have a neutral impact on the local community across 6 of the 8 measures assessed and a positive impact on 2 of the 8 measures. Overall, the proposal would likely have a positive impact on the local community.

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

#### 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 2 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. Pupils would attend the SRB from all areas of the Vale of Glamorgan.

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

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

#### 5.1. ISSUES RAISED IN RELATION TO THE PROPOSAL:

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##### THEME 1

##### **Lack of Clarity and Communication**

Respondents raised concerns regarding the proposed changes to the Engagement Service and their impact on schools. Respondents highlighted a lack of detailed information about how the service will function across different educational settings, particularly mainstream schools already facing staffing and funding pressures. There is uncertainty about whether experienced staff will be transferred to Holton Primary to support the new provision, and how pupils currently attending Y Bont will be supported during their transition. Stakeholders also noted the absence of technical

details on sensory design feature such as lighting, acoustics, and zoning linking to the needs of the identified cohort. Additionally, the proposal mentions a new all-age SEMH (Social, Emotional, and Mental Health) school but lacks clarity on its governance, timeline, and integration with existing services, raising concerns about the coherence and sustainability of the overall specialist provision system.

### **Council's response to the concerns raised**

A comprehensive operational framework is currently being developed which will be shared with wider stakeholders to ensure transparency and effective partnership working.

In response, Vale of Glamorgan would like to clarify that Derw Newydd caters for all age pupils with SEMH, this school was developed and handed over in Summer, 2023. Y Bont pupils have already been successfully transferred across to Derw Newydd, ensuring a smooth transition. As the Holton base environment has also been resourced and updated for pupils with SEMH needs, consideration of the sensory needs of the pupils has been central to layout and resourcing including lighting and acoustics.

The internal reorganisation of the Engagement Service into dedicated teams, focusing on specific ages and areas of need, and prioritising early intervention, is ensuring greater consistency of advice and support across all Vale schools for pupils age 3-11. Detailed information about the internal changes has now been discussed individually with every school and the new support offer is now well understood. Access to Engagement Service consultation, advice, specialist training and interventions continues to be available to all schools on a need led basis. The council is committed to delivering inclusive education and equitable access to specialist resources, aiming to prevent mainstream schools from becoming isolated.

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## **THEME 2**

### **Impact on Existing School Provisions**

Concerns have been raised by governors at Pencoedtre and Whitmore High Schools regarding the proposal to extend outreach services for Years 8–11 through their specialist resource bases. These schools, which currently operate at full capacity, were not consulted prior to their inclusion in the plan. Additionally, the autism bases at both institutions were omitted from the Community Impact Assessment, raising questions about the adequacy of planning and stakeholder engagement. Concerns also raised over the lack of provisions for increased staffing and funding, which are essential to support any expansion of services without compromising existing operations.

### **Council's response to the concerns raised**

The Council recognises that Whitmore and Pencoedtre are at full capacity, and so therefore to acknowledge this the model for supporting this age range changed.



There is a wealth of knowledge and skills around supporting pupils with autism within Vale secondary schools, in comparison with other areas of need, and delivering our service based on medical diagnosis isn't in line with ALNET.

We have changed the offer for 8-11 support, especially as there has been a significant amount of specialist advice and interventions ring fenced for a very small number of pupils with medical diagnosis of autism previously. The Council are advising schools to seek advice from agencies already used by schools for all other pupils without autism diagnosis e.g. Educational Psychologist Service and In-Reach. In-Reach are anticipating a reduction in requests for advice and support for pupils in year 7 as the Engagement Service (ES) will be supporting these children, so they now have more capacity to advise on the complex pupils with Mental Health and a medical diagnosis of autism.

The most requested and impactful piece of work in secondary schools has been the 'All About Me' (previously 'Disclosure') programme. Last year the ES developed training for mainstream schools to use this intervention, in anticipation of the changes. Evaluation of the first roll out is that staff feel confident and equipped to take on the intervention themselves. The ES have also developed an All About Me program for young people with ADHD and a parallel programme around understanding the survival brain, for young people who have experienced or are continuing to experience painful and scary life events. The ES can deliver any of these for pupils in Year 7 when appropriate, as we upskill your staff.

The involvement of the ES across all areas of need, SEMH and ND, with and without a diagnosis will be helpful. The positive change means that schools can now request ES involvement around Year 7 pupils not already known to the service, if new needs emerge at a school, or new pupils transfer. The ES should also be more available to work on capacity building and upskilling staff on other areas of need. The ES are working with secondary ALNCOs together for the Solution Focused Problem-Solving groups and good practice sharing.

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## THEME 3

### **Operational and Logistical Challenges**

Operational and logistical challenges have been identified in relation to the Holton Road site, particularly concerning school transport. Key issues include restricted parking zones and enforcement policies that may obstruct safe and legal access for school transport vehicles. Additionally, the need for staff to escort pupils places further strain on already stretched school resources. The use of part-time placements and staggered timetables adds complexity to transport arrangements, increasing both logistical difficulties and associated costs. These challenges are compounded by an existing overspend of approximately £1.2 million in the transport budget, raising serious concerns about the financial sustainability of the current system.

### **Council's response to the concerns raised**

We acknowledge that restricted parking zones and enforcement policies may present barriers to school transport vehicles. Joint working with Highways and Parking Enforcement teams is crucial to identify designated drop-off and pick-up zones near schools. Highways team are responsible for reviewing enforcement protocols to allow

for flexibility where safety and access are at risk. We are committed to maintaining statutory obligations while ensuring that the transport system remains financially viable. The education team will work with relevant Highways officers to address these concerns to ensure that transport vehicles can operate legally and safely without compromising pupil welfare.

We understand that part-time placements and staggered start/end times complicate transport logistics and increase operational costs. To manage this, we will coordinate with schools to align timetables where feasible. We will also assess the impact of these arrangements on families and staff to ensure they remain manageable. Further updates will be shared as this work progresses.

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

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

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### THEME 4

**There is a clear need for this provision.**

#### **Recognition of Need and Strategic Value**

The proposal has received broad support as a strategic and timely response to the growing demand for specialist educational provision. Stakeholders recognise the SRB (Specialist Resource Base) initiative as a well-considered solution that will enable children with additional learning needs (ALN) to access appropriate support more effectively. The changes are also viewed as a more efficient use of resources, enhancing service capacity and long-term sustainability.

#### **Council's response**

The increasing demand for specialist provision is a challenge we must meet with urgency and care. There is an identified trend in a growth in ALN across all of our schools. In 2023 there was 107 pupils in Welsh medium primary schools identified as having SEN/ALN which has risen from 88 in 2022. In all mainstream primary schools the number of pupils with SEN/ALN has risen from 1,227 in 2021 to 1,251 in 2023. Data also indicates a rise in neuro diverse pupils with conditions such as autism and attention deficit hyperactivity disorder, there is also evidence of a clear increase in children and young people being identified as having issues relating to their mental health, emotional and social development. The proposal reflects our proactive approach to expanding capacity in a sustainable and inclusive way, reducing pressure on existing services and ensuring equitable access to high-quality support across the authority.

### **Support for Reforming the Specialist Provision Model**

Respondents were in agreement that the current model requires updating to meet the evolving needs of children and young people. Respondents support the Vale of Glamorgan Council's commitment to modernising and expanding specialist services.

#### **Council's response**

The Vale of Glamorgan's existing structures must adapt to better serve children and young people with increasingly complex needs. This proposal represents a significant step forward in strengthening early intervention and outreach, enhancing the flexibility and capacity of specialist provision and promoting equity of access across all settings. The Council's School Investment Programme reflects the Council's commitments for further development of specialist resources, it is a strong focus for the directorate of Learning & Skills and a key driver for this proposal.

The Vale of Glamorgan Council are committed to ensuring that these changes are informed by evidence, shaped by lived experience, and delivered in partnership with our schools and communities.

## **7. ANNEX C - FREQUENTLY ASKED QUESTIONS.**

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

### **Engagement Service and Staffing**

1. What changes are being made to the Engagement Service, and how will they affect support for schools?
2. What specific support will mainstream schools receive under the new model, especially given current financial and staffing pressures?
3. Will experienced staff currently working in specialist provision be transferred to Holton Road to support the new SRB?
4. Has the proposal to deliver outreach services for Years 8–11 through Whitmore and Pencoedtre High Schools been discussed with their leadership and governing bodies?
5. Is there funding allocated to support the additional staffing needs at Whitmore and Pencoedtre if they are to deliver engagement services?

### **Planning and Consultation**

6. Why were Whitmore and Pencoedtre High Schools not included in the consultation groups, given the potential impact on their resource bases?
7. How will the Council ensure that future proposals are fully planned and collaboratively developed with affected schools?

### **Transport and Logistics**

8. How will school transport be managed given the parking restrictions around Holton Road?
9. Will enforcement policies be adjusted to accommodate school transport, and what impact will this have on local revenue?

10. How will staffing be arranged to safely escort pupils to and from transport vehicles, especially with limited parking access?
11. What provisions are in place to manage transport for pupils on part-time or staggered timetables?
12. How will the Council address the existing £1.2 million transport budget overspend when implementing this proposal?

## 8. ANNEX D - RESPONSE FROM ESTYN

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

### **Estyn response to the proposal by the Vale of Glamorgan Council to Create New Delivery Models for Enhanced & Sustainable Specialist Provision.**

#### **Proposal to create new delivery models for enhance and sustainable specialist provision in the Vale of Glamorgan**

##### **Introduction**

This report has been prepared by His Majesty's Inspectors of Education and Training in Wales. Under the terms of the *School Standards and Organisation (Wales) Act 2013* and the associated *School Organisation Code (2018)*, proposers are required to consult Estyn on the educational aspects of school organisation proposals. Estyn is not a body required to act in accordance with the Code, and therefore provides its opinion only on the overall educational merits of the proposal.

Estyn has considered the educational aspects of the proposal as set out in the consultation document provided by the Vale of Glamorgan Council, dated September 2025.

##### **Summary / Conclusion**

The proposal is well founded and likely to at least maintain and improve educational standards in the Vale of Glamorgan. It has clear potential to enhance the local authority's capacity to meet the growing needs, particularly those pupils with social, emotional and mental health (SEMH) and neurodiverse profiles. The planned Specialist Resource Base (SRB) at Holton Primary School and the expanded Engagement Service at Ysgol y Deri are based on established and effective practice and provide a balanced, sustainable response to rising demand. Governance, funding and implementation arrangements are coherent, and the proposal aligns well with national ALN reforms, making effective use of existing resources to improve outcomes and well-being for learners.

The consultation demonstrates a clear understanding of the needs of vulnerable learners and gives suitable attention to safeguarding, inclusion, and transition arrangements. However, certain aspects would benefit from greater clarity. Specifically, further information is needed on the sensory and physical design of the new accommodation, and on how leaders will be supported to manage, evaluate and sustain the new provision effectively over time.

The consultation partially refers to pupil numbers, giving specific figures for school capacity and SRB places, but omits wider quantitative evidence on the scale of ALN demand or the expected reach of the proposals. It would also be helpful for the local authority to clarify the future of the existing Y Bont provision and explain how pupils currently attending that setting will be supported through transition to ensure continuity of care, specialist expertise and staff stability.

In addition, the consultation refers to an intention to develop a new all-age specialist school for pupils with SEMH, but provides limited detail regarding its scope, governance, location and timescale. Clarification of how this development will relate to the Engagement Service, Ysgol y Deri, and mainstream outreach support would strengthen confidence that the overall model of specialist provision across the Vale of Glamorgan is coherent, equitable and sustainable.

Although the consultation refers extensively to the most recent inspection of Ysgol y Deri, it is important to emphasise that Estyn's inspection did not evaluate the school's effectiveness in delivering outreach or engagement services on behalf of the local authority. Consequently, the numerous references to this inspection cannot be regarded as evidence of the school's performance in fulfilling that wider function and should not be used to substantiate the effectiveness of the current or proposed engagement service. The consultation does not provide evidence that the authority has evaluated the quality, reach or impact of existing outreach provision. Further assurance is required that the proposed expansion of the Engagement Service is informed by robust evaluation and that it builds on proven, effective practice.

## **Description and Benefits**

### **Rationale and Clarity**

The proposer provides a clear and well-substantiated rationale for the proposed changes. The proposal is explicitly linked to the Additional Learning Needs and Education Tribunal (Wales) Act 2018, the growing demand for specialist provision, and the need for a sustainable and equitable model accessible to all schools. The rationale is supported by inspection evidence from Holton Primary School (2019) and Ysgol y Deri (2025), both of which demonstrate strong practice in inclusion, care and curriculum design.

### **Description, Timetable and Interim Arrangements**

The consultation outlines two main strands:

1. The establishment of an English-medium SRB at Holton Primary School for pupils aged 4–11 with social communication, interaction and regulation difficulties, supported by a pilot already in operation; and
2. The expansion of the local authority's Engagement Service, currently delivered by Ysgol y Deri, to strengthen early intervention and outreach capacity across primary and secondary phases.

The timetable for consultation and implementation is clear and consistent with the School Organisation Code (2018). The inclusion of pilot phases is a positive feature that should help inform delivery and minimise disruption for learners.

## **Expected Benefits and Disadvantages**

The proposer sets out clear benefits, including increased capacity to meet SEMH and neurodiverse needs locally, improved equity of access to specialist support, strengthened inclusive practice in mainstream schools and enhanced professional learning.

Potential disadvantages, such as short-term staffing disruption or resource redistribution, are acknowledged and mitigated appropriately through phased implementation and central oversight. However, greater assurance is needed regarding the long-term resourcing of the Engagement Service to ensure its sustainability beyond the initial reallocation period.

## **Alternatives Considered**

Reasonable alternatives, including maintaining current provision or locating the SRB elsewhere, are considered and discounted on logical, evidence-based grounds related to suitability, cost and educational benefit.

## **Travel, Accessibility and Surplus Places**

Learner travel arrangements are considered in line with the Learner Travel (Wales) Measure 2008. The proposal promotes equity of access, and the use of existing space at Holton Primary School makes efficient use of surplus capacity without adversely affecting mainstream provision.

## **Welsh Medium and Strategic Planning**

Holton Primary is an English-medium school. The proposer acknowledges the implications for Welsh-medium education and identifies alignment with the local authority's Welsh in Education Strategic Plan (WESP). The proposal is unlikely to impact Welsh-medium provision adversely. Both a Welsh Language Impact Assessment and a Community Impact Assessment have been completed as required.

## **Financial Aspects**

Financial implications are clearly explained. Capital works have been funded through Welsh Government ALN capital allocations, and revenue budgets have been reprofiled from existing resources, making the proposal cost-neutral and sustainable.

## **Educational Aspects of the Proposal**

### **Standards and Progress**

The educational rationale is well founded. Both schools provide strong foundations for inclusive practice. The SRB and the Engagement Service are likely to improve consistency and standards in meeting ALN and SEMH needs through targeted, specialist teaching and outreach.

The most recent Estyn inspection of Holton Primary School (2019) recognised the school's inclusive ethos and positive well-being outcomes but identified two areas for further development: strengthening transitions between phases and improving consistency in provision for pupils with additional learning needs. The proposed SRB provides a timely opportunity to address these issues by enhancing staff expertise and coherence in ALN provision. The local authority should confirm how it has

reassured itself that appropriate action has been taken to address these inspection findings, and how the SRB will build upon the school's ongoing improvement work.

### **Well-being and Attitudes to Learning**

Both Holton Primary and Ysgol y Deri demonstrate strong practice in supporting pupil well-being and engagement. The proposed model builds on these strengths and will expand the authority's capacity to support emotional regulation, resilience and inclusion across settings.

### **Teaching, Curriculum and Skills**

The proposal outlines robust plans for specialist teaching, multi-agency collaboration and alignment with the Curriculum for Wales. Through outreach and professional learning, it has clear potential to enhance the quality of teaching for ALN learners and to strengthen inclusive pedagogy across the wider school system.

### **Care, Support and Guidance**

Both schools have a strong record of safeguarding and pastoral care. The dual-registration model for SRB pupils is appropriate and promotes continuity of care and reintegration. However, the consultation should clarify transition arrangements for pupils currently attending Y Bont, ensuring that their educational and emotional needs continue to be met and that staff expertise is retained.

### **Leadership and Management**

Leadership capacity across both schools is strong. The Directorate's central oversight ensures accountability, while integration within existing governance structures promotes coherence. Ysgol y Deri's experience of managing provision for pupils with varying additional learning needs is a significant strength. To reinforce assurance, the authority should outline how elected members, senior officers, leaders, ALNCoS and governors will be supported to evaluate and sustain the new provision effectively.

### **Vulnerable Groups and ALN**

The proposal demonstrates sound understanding of vulnerable learners' needs, especially those with autism and SEMH. Eligibility and review processes are well defined. The accommodation at Holton Primary provides safe, secure and accessible spaces with outdoor areas for regulation and social interaction. Nonetheless, further

technical detail on sensory design features—such as lighting, acoustics and zoning—would strengthen the proposal and ensure the environment is optimally suited to the identified cohort.

The proposal also refers to the creation of a new all-age SEMH school, but provides limited detail. The authority should clarify its vision for this development, including governance, timescale and alignment with existing services, to ensure the overall system of specialist provision is coherent and sustainable.

### **Minimising Disruption**

The use of pilot phases, careful transition planning and refurbished accommodation should minimise disruption for learners. The authority demonstrates awareness of

the need for a staged, well-supported transition and continued collaboration between settings.

### **Community Impact Assessment**

The local authority has provided a Community Impact Assessment as part of this proposal. It concludes that the proposal will have a neutral impact across most measures and a positive effect on inclusion and the effective use of existing school accommodation. No negative impacts on community facilities, employment, businesses or infrastructure are identified. Overall, the proposal is expected to benefit the local community by improving access to specialist support, promoting inclusion and sustaining educational provision across the Vale of Glamorgan.





# DIRECTORATE OF LEARNING AND SKILLS COMMUNITY IMPACT ASSESSMENT

CONSULTATION ON THE PROPOSAL TO CREATE NEW  
DELIVERY MODELS FOR ENHANCED & SUSTAINABLE  
SPECIALIST PROVISION.



*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. We are 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 is in two parts:

- To establish a new English Medium specialist resource base at Holton Primary School with effect from 1 January 2026, or as soon as possible thereafter. A pilot provision is currently operating at the school in order to inform decision making.
- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.

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 or deprived 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 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. In recent years the growth in ALN need has increased exponentially across our overall provision in specialist education, and there is a need to consolidate support to widen access to specialist support, training and interventions across all our schools. Information gathered suggests that due to an increase of pupils with social, emotional and mental health (SEMH), a more strategic approach is needed, to improve sustainability of our services for all of our pupils.

## COMMUNITY PROFILE

Holton Primary School is located within the **LSOA** Buttrills 3 (W01001065)

The **LSOA** has a population of **1564** based upon the 2021 census.

The data below for the Buttrills 3 **LSOA** 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)
<b>Buttrills 3</b>	<b>Ranked of 1909 (Education)</b>	<b>814</b>	30%-50% most deprived	<b>1067</b>	50% least deprived	<b>1760</b>	50% least deprived

As the table above shows, the **LSOA** accommodating Holton Primary School is mixed in terms of levels of deprivation. The LSOA area the school is located in is one of the most deprived areas in 1 of the 3 measures, however it ranks within the 50% least deprived in terms of access to services and employment due to its suburban location.

St Josephs Catholic Primary School is located within the **LSOA** Dinas Powys 3 (W01001088)

The **LSOA** has a population of **2142** based upon the 2021 census.

The data below for the Dinas Powys 3 **LSOA** 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)

<b>Dinas Powys 3</b>	<b>Ranked of 1909 (Education)</b>	<b>874</b>	30%-50% most deprived	<b>660</b>	30%-50% most deprived	<b>929</b>	3-50% most deprived
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The LSOA area the school is located in is one of the most deprived areas in 3 of the 3 measures.

## ADDITIONAL LEARNING NEEDS

The Council is committed to meeting the requirements of the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018) in transforming expectations and outcomes for children and young people with additional learning needs (ALN). This provides a statutory framework for supporting children with ALN and is accompanied by a mandatory Code which makes sure that the new system has a set of clear, legally enforceable parameters within which local authorities, schools, further education colleges and health services responsible for the delivery of services to children and young people with ALN must act. The aim of the new approach, as stated in the Code is as follows: To support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.

There is an identified trend in a growth and complexity of need in those requiring specialist provision across all of our schools. This is a nationwide trend. Data also indicates a rise in neuro diverse pupils with conditions such as autism and attention deficit hyperactivity disorder, there is also evidence of a clear increase in children and young people being identified as having issues relating to their social, emotional and mental health needs.

While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county. Financial pressures both at a school and Local Authority level also play a significant role in terms of the sustainability of the provision, and more leverage on supporting mainstream schools on teaching and learning and inclusive practice are needed to manage the demand, upskill and coordinate a regional approach to supporting SEMH challenges in schools, to ensure consistency of practice, accessibility and the impacts on local schools are as equitable as possible.

## 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	1	<p>The creation of the SRB would utilise currently unused space at Holton Primary School. This would not therefore have an adverse impact on admissions to Holton as current projections indicate the existing mainstream provision at the school is more than sufficient to meet demand from within its catchment area.</p> <p>The English Medium specialist resource base at Holton Primary School would deliver specialist educational provision for pupils aged 4-11 years. The purpose of this specialist resource would be to support individual learners as well as improve the capacity of the home school to create a fully inclusive environment where all learners are given the opportunity to succeed and have access to an education that meets their needs.</p> <p>It is proposed that an expanded model of the Local Authorities engagement service model, currently being delivered by Ysgol Y Deri is put into place to leverage the existing Early Intervention Base (EIB) provision to achieve three main advantages:</p> <ol style="list-style-type: none"> <li>1. Prioritise early intervention and an equitable graduated response for pupils with SEMH needs in primary schools:</li> <li>2. Prioritise early intervention and an equitable graduated response for the youngest pupils with SEMH within secondary schools:</li> <li>3. Deliver specialist interventions for pupils in Year 3 to Year 6 within mainstream schools, building on the successful work already taking place.</li> <li>4. Establish one specialist school for children with SEMH at both primary and secondary levels.</li> </ol>

CI2	Services provided by the school for the local community, including extra-curricular activities	1	It is proposed that any community services currently provided by the named schools would continue and that there would be no loss of provision.
CI3	Community facilities used regularly by the school	0	There would be no loss of access for community facilities as a result of this proposal at any of the named school sites.
CI4	Community facilities provided by and activity undertaken within the school premises	0	The proposal will not change the current community facilities provided by the schools.
CI5	Impact on local businesses	0	There would be no impacts upon local businesses as a result of this proposal.
CI6	Impact on local employment	0	The current base (Y Bont) at High Street offers 8 places on a pupil / staff ratio of 1:1/2. There is one qualified teacher and 5 support staff (2 HTLA & 3 LSA Level 3+). Staff of Y Bont are employed by the school to meet the needs of the base. Consequences of the new pilot starting are that the school/GB will need to consider its staffing requirements. Any proposed future changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.
CI7	Impact on local infrastructure	0	The proposal would not result in an increase in capacity at any of the schools which would cause increased pressure on local infrastructure. Instead the proposal will adapt to existing vacant classrooms.



			Holton 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.
CI8	Transport arrangements	0	<p>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> <p>Mainstream primary aged pupils are provided with free school transport if they live 2 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 may 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>

## SCORING SUMMARY

Ref.	Local Community
CI1	1
CI2	1
CI3	0
CI4	0
CI5	0
CI6	0
CI7	0
CI8	0
Average Score	0

## CONCLUSIONS

In recent years the growth in ALN need has increased exponentially across our overall provision in specialist education, and there is a need to consolidate support to widen access to specialist support, training and interventions across all our schools. Information gathered suggests that due to an increase of pupils with social, emotional and mental health (SEMH), a more strategic approach is needed, to improve sustainability of our services for all of our pupils. The proposal is to create new delivery models for enhanced and sustainable specialist education provision. This consultation forms part of a wider strategy to ensure that ALN specialist education provision in the Vale of Glamorgan is responsive, sustainable and evolves to meet existing and future challenges.

The impact assessment identifies that the proposal would likely have a neutral impact on the local community across 6 of the 8 measures assessed and a positive impact on 2 of the 8 measures. Overall, the proposal would likely have a positive impact on the local community.

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

# Equality Impact Assessment

## 1. What are you assessing?

Proposal to create new delivery models for enhanced & sustainable specialist provision.

## 2. Who is responsible?

<b>Name</b>	Lisa Lewis	<b>Job Title</b>	Operational Manager
<b>Team</b>	Strategy & Resources	<b>Directorate</b>	Learning & Skills

## 3. When is the assessment being carried out?

<b>Date of start of assessment</b>	4 November 2025
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## 4. Describe the proposal?

### What is the purpose of the proposal?

On the 11th July 2025, the Council's Cabinet authorised the Director of Learning & Skills to undertake a consultation from 8 September to 19 October 2025 on proposal to create new delivery models for enhanced & sustainable specialist provision.

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 consultation was done in two parts:

- To establish a new English Medium specialist resource base at Holton Primary School with effect from 1 January 2026, or as soon as possible thereafter. A pilot provision is currently operating at the school in order to inform decision making.
- To introduce an expanded model of the Local Authorities engagement service, currently being delivered by Ysgol Y Deri. This will be piloted in the autumn term 2025 in order to inform decision making.

This would mean a change to the existing provision currently provided at Y Bont. Y Bont is a resource base currently situated at High Street Primary School. This base acts as a centre of excellence for behavioural, emotional and social difficulties and provides a stimulating, rich environment and specialist staff to cater for children with SEMH needs on a full-time basis. Places are offered on a full-time basis with dual registration with their home school, and the base operates as a 'revolving door' with the expectation that following a period of intervention and specialist support, pupils will be able to leave the resource base and be reintegrated back into full time mainstream education.

# Equality Impact Assessment

While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county

The Specialist Resource Bases (SRB) would provide periods of integrated provision for pupils with social, emotional and mental health (SEMH), to improve sustainability of our services for all of our pupils.

## **Why do you need to put it in place?**

There is an identified trend in a growth in ALN across all of our schools. In 2023 there was 107 pupils in Welsh medium primary schools identified as having SEN/ALN which has risen from 88 in 2022. In all mainstream primary schools, the number of pupils with SEN/ALN has risen from 1,227 in 2021 to 1,251 in 2023.

Successful WM Resource Bases have previously been established at Ysgol Bro Morgannwg (secondary age, Welsh Medium education) and Gwaun y Nant (primary Welsh medium education) in the Vale. Data also suggests a clear increase in children and young people being identified as having issues relating to their mental health, emotional and social development, which is the reason for this proposal.

The Council is committed to meeting the requirements of the Additional Learning Needs and Education Tribunal Act 2018 (ALNET Act 2018) in transforming expectations and outcomes for children and young people with additional learning needs (ALN). This provides a new statutory framework for supporting children with additional learning needs (ALN) and is accompanied by a mandatory Code which makes sure that the new system has a set of clear, legally enforceable parameters within which local authorities, schools, further education colleges and health services responsible for the delivery of services to children and young people with ALN must act.

The aim of the new approach, as stated in the Code is as follows: To support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.

There is a well-established outreach service in the Vale of Glamorgan providing support to schools for pupils with ALN. Following an analysis of current data, it was identified that there was a need for additional specialists to support schools in the areas of social, emotional, and mental health. The establishment of additional SRB units would provide integrated provision for pupils experiencing significant social communication and interaction.

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

No capital funding is required to ensure that the identified accommodation is suitable as capital works have been completed following an identification of the space for future use

# Equality Impact Assessment

for ALN provisions as part of the Welsh Government Capital Grant for Additional Learning Needs. The implementation of the proposal does not require further amendments to the Holton Primary not St Josephs R.C Primary school.

The funding for the SRB for 24/25 is £162,004 and is held centrally within the Learning & Skills Directorate. This funds one full time teacher plus one Higher Level Teaching Assistant and one full time learning support assistant. The school will also receive £11,000 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 are currently estimated at approximately £20,000 to £27,000 per annum. Transport costs can fluctuate considerably depending on the home address of the pupils attending the SRB therefore transport costs cannot be accurately forecast in the longer term. Pupils can attend the SRB from all areas of the Vale of Glamorgan.

## **What are the intended outcomes of the proposal?**

This would mean a change to the existing provision currently provided at Y Bont. Y Bont is a resource base currently situated at High Street Primary School. This base acts as a centre of excellence for behavioural, emotional and social difficulties and provides a stimulating, rich environment and specialist staff to cater for children with SEMH needs on a full-time basis. Places are offered on a full-time basis with dual registration with their home school, and the base operates as a 'revolving door' with the expectation that following a period of intervention and specialist support, pupils will be able to leave the resource base and be reintegrated back into full time mainstream education.

While the provision at Y Bont has been successful and there are areas of best practice, the scope is limited given the demand, and the pressures on High Street Primary School in operating the base have been disproportionate given the outcomes required from a provision such as this, given the demand across the county.

The Council:

Provides an improved learning environment which is adaptable to change and will challenge and support children to reach their full potential.

Provides opportunities for professional development throughout our Primary Schools.

The Specialist Resource Bases (SRB) would provide periods of integrated provision for pupils with social, emotional and mental health (SEMH), to improve sustainability of our services for all of our pupils.

## **Who does the proposal affect?**

The proposal will provide additional resources for pupils attending mainstream schools in the Vale of Glamorgan.

# Equality Impact Assessment

## **Will the proposal affect how other organisations work?**

There would be a positive impact for pupils as the proposal would result in improved provision to provide periods of integrated provision for pupils with social, emotional and mental health (SEMH). This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education.

This proposal, if successful would be a significant step to reduce pressures on other SRB units in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018.

## **Will the proposal affect how you deliver services?**

There would be a positive impact for pupils as the proposal would result in improved provision to provide periods of integrated provision for pupils with social, emotional, and mental health (SEMH). This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education. The proposal would support pupils to continue to access mainstream education with additional support.

## **Will the proposal impact on other policies or practices?**

The SRB unit would be managed centrally by the Directorate of Learning & Skills within existing policies and procedures. The Directorate of Learning & Skills would work collaboratively with the headteacher and governing bodies of all schools involved to ensure the SRB units are able to operate within the school framework.

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.

## **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 consultation period. All responses received as part of the consultation are reflected in the Consultation Response 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:

## Equality Impact Assessment

Staff (teaching and non-teaching) at High Street, Holton Primary School. St Joseph's and Ysgol Y Deri	Governing Bodies of High Street, St Joseph's, Holton Primary School and Ysgol Y Deri
Parents/Carers and Guardians of children at all Vale schools	Directors of Education – All Neighbouring Authorities
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	

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:

<https://www.valeofglamorgan.gov.uk/en/living/schools/SRB-consultation.aspx>

### How will you achieve the proposed changes?

The consultation period for the proposal started on 8 September and ended on the 19 October 2025.

Within 13 weeks of 19 October 2025 a consultation response report will be published on the Council's 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. In December 2025, 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 proposal, it must publish a statutory notice.

The Council's proposal would formalise the creation of new delivery models for enhanced & sustainable specialist provision.

# Equality Impact Assessment

## 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:

- **Create new delivery models for enhanced & sustainable specialist provision.**

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.

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

- 1) Do you support the proposal to Create New Delivery Models for Enhanced & Sustainable Specialist Provision? If you support or do not support the proposal, then please explain why.

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.



# Equality Impact Assessment

Total (individual) responses:	Total support		Total not in support	
No.	No.	%	No.	%
4	2	50%	2	50%

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.

<b>What is your gender?</b>							
Male	1	Female	3	Non-binary	N/A	Prefer not to say	0
<b>How old are you?*</b>							
35-44	1	45-54	1	55-74	2	Prefer not to say	0
<b>Are your day-to-day activities limited because of a physical or mental health condition, illness or disability?</b>							
Yes – limited a lot	0	Yes – limited a bit	1	No	3	Prefer not to say	0
<b>How would you describe your national identity?</b>							
Welsh	3	English		Scottish		Northern Irish	
Other		Prefer not to say		British	1		
<b>How would you describe your ethnic group?*</b>							
White	4	Mixed		Asian		Black	
Other Ethnic Group		Prefer not to say					
<b>Please describe your Welsh language ability by ticking the relevant box(es) below.</b>							
Understand	2 good 2 basic	Speak	1 good 1 competent 2 basic	Read	2 good 2 basic	Write	2 good 1 basic 1 None
<b>Which of the following options best describes how you think of yourself?*</b>							
Heterosexual / straight	4	Gay or lesbian		Bisexual or pansexual		Prefer not to say	
<b>What is your legal marital status?*</b>							

# Equality Impact Assessment

Single	1	Married	3	registered same-sex civil partnership and living with your partner		Prefer not to say	
<b>Are you currently pregnant or have you been pregnant within the last year?</b>							
Yes		No	4	Prefer not to say			
<b>Have you taken maternity leave within the past year?</b>							
Yes		No	4	Prefer not to say			

\*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 Vale of Glamorgan Council's websites on the 8 September 2025.

The bilingual consultation documents were published on 8 September 2025 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 Create New Delivery Models for Enhanced & Sustainable Specialist Provision?

# Equality Impact Assessment

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 19 October 2025. Of the total 4 individual responses received, 2 were in favour of the proposal, 2 were not in support.

## 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

# Equality Impact Assessment

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.

Holton Primary School and St Josephs R.C Primary benefit 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.

The SRB would have access to outdoor space. Staff would utilise the existing staff room within the schools to help foster a strong connection between the SRB and the wider school, improving integration.

The proposed location would provide:

- A high-quality IT rich learning environment for pupils meeting the educational curriculum needs of the 21st Century
- Outdoor facilities for ALN pupils
- Specialist provision to provide a curriculum that best meets the needs of learners

## 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 impact of not proceeding with the creation of the new SRB would be that there would be inadequate specialist provision for ALN. The new SRB would provide additional capacity to accommodate additional pupils. The new SRB would be able to provide a specialised learning environment to deliver integrated provision for pupils with significant social communication, interaction, or regulation difficulties. The facilities available at the schools are suitable for 21st century learning.

In proceeding, there may be a negative impact :

- Management of staff and resources may be disrupted during the implementation of the proposal. As the base is already operating as a pilot project, this would be minimal.
- Some pupils will have further to travel to the new SRB than to their home school.

### **What are the gaps?**

The protected characteristics of future pupils attending the SRB are unknown at this

# Equality Impact Assessment

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 opportunities via a variety of confidential methods were given to respondents 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 pupils, staff or governors. As a result this is not included in this assessment.

The Council would ensure that all those accessing this provision were not 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.

The protected characteristics of future occupiers of the school cannot be known however the SRB management 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.

# Equality Impact Assessment

<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 would serve primary school aged pupils in EM school settings. The creation of the SRBs would improve access to all pupils within the primary school age bracket. Therefore, it is considered the proposal would have a **positive** impact on the protected characteristic of age.

#### Disability

# Equality Impact Assessment

The Specialist Resource Base (SRB) would provide periods of integrated provision for pupils experiencing significant social communication, interaction, or regulation difficulties. This will include pupils whose high level of anxiety is impacting significantly on their ability to access mainstream education.

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 eligible children would receive a high quality education at the new SRB. 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 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 SRB would be 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.

# Equality Impact Assessment

## 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 both schools is currently White Welsh/English/Scottish/Northern Irish British. 79.9% (Holton) and 79.3% (St Joseph's). This is reflective of the wider Vale Primary School population which has an average of 86.6% 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 significantly 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. Holton Primary School is a community school and the aspect of the curriculum relating to religion and belief would not change as a result of this proposal.

St Josephs however is a Roman Catholic school, the aspect of the curriculum relating to religion and belief would not change as a result of this proposal.



# Equality Impact Assessment

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

Holton Primary School currently has 47% male pupils on roll and 53% female.

St Josephs RC School has 47% male pupils on roll and 53% female.

The percentage split at the school is a similar percentage to the Vale wide Welsh medium primary pupil population (48% male and 52% female). 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 SRB. There would be no different methods of teaching or curricula for either sex. The SRB 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

## Equality Impact Assessment

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

Successful Resource Base have previously been established at Ysgol Bro Morgannwg and Gwaun y Nant and it was evident that a base for pupils attending primary Welsh medium education in the Vale was also required to establish a continuum of provision from 4-18. These linked with the Vale of Glamorgan's Welsh in Education Strategic Plan (WESP) sets out our ambitions in this regard with relation to Welsh medium education.

There is a well-established outreach service in the Vale of Glamorgan providing support to schools for pupils with ALN. Following an analysis of the workforce it was identified that there was a need for additional specialists to support schools in the areas of social, emotional, and mental health. The establishment of an SRB at both schools would provide integrated provision for pupils experiencing significant social communication, interaction.

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 as it would lead to the creation of a new provision not currently in place.

### 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.

# Equality Impact Assessment

- 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.

There would be a positive impact regarding ALN as the proposal would result in improved provision available for pupils experiencing significant social communication, interaction, or regulation difficulties. The proposal would support pupils to continue to access mainstream education with additional support.

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 **positive** impact on people in this protected group due to the creation of new employment and development opportunities.

## 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

The proposal would address a number of challenges and would:

- Provide an improved learning environment which is adaptable to change and will challenge and support children to reach their full potential.
- Provide opportunities for professional development throughout our Primary Schools.
- Ensure that pupils experiencing significant social communication, interaction, or regulation difficulties can have their needs met within the local authority and can be supported to remain in their mainstream school

### Economic

## Equality Impact Assessment

The SRB would be based at both schools serve the whole local authority area. Holton Primary School is located within in Barry. St Josephs RC Primary is based in Penarth.

The ward has a population of 5,488 based upon the 2021 census.

The data below for the Gibbonsdown 2 ward 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)
Gibbonsdown 2	<b>Ranked of 1909 (Education)</b>	<b>105</b>	10% most deprived	<b>127</b>	10% most deprived	1070	50% least deprived

As the table above shows, the ward accommodating Ysgol Gwaun Y Nant are mixed in terms of levels of deprivation. The LSOA area the school is located in is one of the most deprived areas across 2 of the 3 measures, however it ranks within the 50% least deprived in terms of access to services due to its suburban location

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.

### 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'.

# Equality Impact Assessment

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 due to the creation of a new resource.

## 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.**

# Equality Impact Assessment

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 provide a new resource 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. This proposal would therefore have a **positive** impact on age.

## Disability

The proposal would have a **positive** impact as the new SRB is within an accessible school building and provides additional support for pupils with a recognised disability.

## 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 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

# Equality Impact Assessment

Staff would 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 be treated and taught equally in the SRB. 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 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)**

# Equality Impact Assessment

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 – Positive**

**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 – Positive**

**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.



# Equality Impact Assessment

## **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 introduction 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. Both schools involved were inspected under the new Framework.

# Equality Impact Assessment

## 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.
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## 12. [Publication](#)

Where will you publish your approved proposal and equality impact assessment?
The Council's website

## 13. [Authorisation](#)

Approved by (name)	
Job Title (senior manager)	Director of Learning and Skills
Date of approval	November 2025

## Equality Impact Assessment

Date of review	
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