

THE VALE OF GLAMORGAN COUNCIL

START WELL SCRUTINY COMMITTEE: 8<sup>TH</sup> SEPTEMBER, 2025

REFERENCE FROM CABINET: 17<sup>TH</sup> JULY, 2025

**“C59 CONSULTATION ON THE PROPOSAL TO CREATE NEW DELIVERY MODELS FOR ENHANCED AND SUSTAINABLE SPECIALIST PROVISION (EAWL) (SCRUTINY – START WELL SCRUTINY) –**

The Cabinet Member presented the report to seek Cabinet approval to consult with stakeholders on the proposal to create new delivery models for enhanced and sustainable specialist provision.

The consultation would look to establish a new English Medium specialist resource base at Holton Primary School or any other suitable venue within the Vale of Glamorgan with effect from 1st January, 2026, or as soon as possible thereafter. The numbers of Additional Learning Needs pupils rose year on year and there were other provisions within primary schools in the Vale of Glamorgan.

The Leader said that there were also discussions taking place among other Local Authorities about the need for inclusion and for young people to stay as close as possible to their homes, peer groups and communities, and how best to achieve that using such Resources Bases.

This was a matter for Executive decision.

Cabinet, having considered the report and all the issues and implications contained therein

RESOLVED –

(1) T H A T the Director of Learning and Skills be authorised to undertake a consultation on the proposal to create new delivery models for enhanced and sustainable specialist provision.

(2) T H A T the report be referred to the Start Well Scrutiny Committee for consideration as part of the proposed consultation exercise with any recommendations referred to Cabinet for consideration.

Reasons for decisions

(1) To seek Cabinet authority to carry out a statutory consultation in compliance with the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018 on the proposal to create new delivery models for enhanced and sustainable specialist provision.

(2) To ensure that the Start Well Scrutiny Committee was consulted on the proposals.”

Attached as Appendix – Report to Cabinet: 17<sup>th</sup> July, 2025

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Thursday, 17 July 2025</b>
Relevant Scrutiny Committee:	Start Well Scrutiny Committee
Report Title:	Consultation on the Proposal to Create New Delivery Models for Enhanced and Sustainable Specialist Provision
Purpose of Report:	To seek Cabinet approval to consult with stakeholders on the proposal to create new delivery models for enhanced and sustainable specialist provision
Report Owner:	Cabinet Member for Education, Arts and Welsh Language
Responsible Officer:	Elizabeth Jones, Director of Learning and Skills
Elected Member and Officer Consultation:	<p>Head of Additional Learning Needs and Wellbeing Operational Manager, Strategy and Resources Project Manager, Sustainable Communities for Learning</p> <p>Local Ward Members would be consulted as part of the consultation process in accordance with the School Organisation Code 2018.</p>
Policy Framework:	This is a matter for Executive decision by Cabinet.
<p>Executive Summary:</p> <ul style="list-style-type: none"> <li>• This report seeks Cabinet approval to consult on the proposal to create new delivery models for enhanced and sustainable specialist provision.</li> <li>• This consultation is in two parts: <ul style="list-style-type: none"> <li>– 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.</li> <li>– 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.</li> </ul> </li> <li>• The consultation would run from 8th September to 17th October, 2025. 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.</li> <li>• The proposal is presented 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.</li> </ul>	

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

The consultation process:

- Consultation would be undertaken with prescribed consultees in accordance with the School Organisation Code 2018. The Council would publish a Consultation Document (Appendix A), which would provide a comprehensive overview of the proposal, outlining any potential implications. A Community Impact Assessment (Appendix B) will also be made available. Any person could respond to the consultation during the consultation period, either in writing or through completion of an online form hosted on the Council's website. Following the consultation, the Council would publish a consultation report, which would provide an overview of the feedback received, as well as outlining the Council's response to any issues raised. This would be presented to Cabinet for consideration.

## **Recommendations**

1. That Cabinet authorises the Director of Learning and Skills to undertake a consultation on the proposal to create new delivery models for enhanced and sustainable specialist provision.
2. That Cabinet refers this report to the Start Well Scrutiny Committee for consideration as part of the proposed consultation exercise with any recommendations referred to Cabinet for consideration.

## **Reasons for Recommendations**

1. To seek Cabinet authority to carry out a statutory consultation in compliance with the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018 on the proposal to create new delivery models for enhanced and sustainable specialist provision.
2. To ensure that the Start Well Scrutiny Committee is consulted on the proposals.

## **1. Background**

- 1.1 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.
- 1.2 This consultation is 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.
- 1.3 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.

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

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

- 2.1** 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.
- 2.2** 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.
- 2.3** 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.
- 2.4** These placements would provide specialist teaching and interventions alongside advice, mentoring and training for staff from the pupil's home school.
- 2.5** 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.
- 2.6** 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)**

- 2.7** 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. Utilise the existing EIB building and resources at St Joseph's Primary School to provide part-time placements for pupils with SEMH difficulties and neuro diverse (ND) N, 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:
  3. 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.
  4. Outreach advice and support for schools with pupils with ND conditions in Year 8-11 to be delivered by Whitmore and Pencoedtre specialist resource base.
  5. Deliver specialist interventions for pupils in Year 3 to Year 6 within mainstream schools, building on the successful work already taking place.
  6. Through utilising the expertise and specialisms in YYD we are strengthening current provision whilst establishing consistent and continuous provision for SEMH across primary and secondary phases. Prioritise early intervention and an equitable graduated response for pupils with SEMH needs in primary schools:

### **Land and Buildings**

- 2.8** 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.
- 2.9** The SRB at Holton would have access to outdoor space. Staff would utilise the existing staff room to help foster a strong connection between the SRB and the wider school, improving integration.

**2.10** The EIB at St Joseph's 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.

**2.11** The proposed locations 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

### **Impact on Education Outcomes**

**2.12** There would be a positive impact regarding ALN as the proposal would result in improved provision available for pupils with SEMH challenges.

### **Admissions Arrangements**

**2.13** All admissions to the SRB at would be via Local Authority Panel.

**2.14** As part of an ongoing review of school capacity, the Published Admission Number (PAN) of the receiving schools will be considered and any amendments presented to Cabinet as part of the annual consultation on admission arrangements.

### **Transport Implications**

**2.15** 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'.

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

**2.17** 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.

**2.18** 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. Pupils would attend the SRB from all areas of the Vale of Glamorgan.

**2.19** The potential benefits of the proposal would allow the Council to:

- 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.

**2.20** The potential disadvantages of the proposal are:

- 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.

### **Community Impact Assessment**

**2.21** 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.

**2.22** It is concluded from the Community Impact Assessment that the proposal would have a positive impact upon the local community as:

**2.23** Children living in the catchment are attending their local school.

**2.24** Services provided by the school for the local community, including extra-curricular activities.

### **Statutory Process**

**2.25** Welsh Government's revised School Organisation Code 2018 came into effect on 1st November, 2018. The Council must "act in accordance with the Code" as determined by the School Standards and Organisation (Wales) Act 2013.

**2.26** Section 48 of the School Standards and Organisation (Wales) Act 2013 Act requires that before school organisation proposals are published, they must first be subject to consultation. A consultation document must be published and provided to prescribed consultees and Welsh Ministers.

**2.27** Consultees must be advised by letter or email of the availability of the consultation document and that a hard copy can be obtained on request. Consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.

- 2.28** 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.
- 2.29** The Council must then decide whether or not to proceed with the proposal within 26 weeks of the end of the period allowed for consultation responses. If following the consultation process the Council decides that the proposal is 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).
- 2.30** 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.
- 2.31** Appendix A sets out the anticipated timescale for this process if approved by Cabinet.

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

- 3.1** The Well-being of Future Generations Act 2015 (“the 2015 Act”) requires the Council to think about the long-term impact of their decisions, to work better with people, communities and each other and to prevent persistent problems such as poverty, health inequalities and climate change.
- 3.2** The Council has committed as part of the Corporate Plan 2020-2025 to achieving a vision of ‘Working Together for a Brighter Future’. This plan is reflective of the Welsh Government’s Well-being of Future Generations Act and is comprised of four Well-being objectives to deliver this vision:
- Objective 1 - To work with and for our communities
  - Objective 2 - To support learning, employment and sustainable economic growth
  - Objective 3 - To support people at home and in their community
  - Objective 4 - To respect, enhance and enjoy our environment
- 3.3** To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council. The 2015 Act makes it clear the listed public bodies must work to achieve all of the goals, not just one or two, these being:
- A prosperous Wales
  - A resilient Wales
  - A healthier Wales
  - A more equal Wales
  - A Wales of cohesive communities
  - A Wales of vibrant culture and Welsh Language

- A globally responsible Wales

**3.4** This proposal contributes to achieving the wellbeing goals by:

- Ensuring a more efficient financial model for ALN management in the Vale.
- Ensuring a more equitable distribution of specialist resources across the Vale.

**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** These proposals meet the five ways of working by:

- Responding to the need to ensure that there is a well-resourced specialist provision available to pupils.
- Making best use of schools that have an environment reflective of the national mission for education in Wales and future curriculum.
- Delivering rigorous consultation with open communication channels and numerous opportunities for stakeholders to engage throughout the process.

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

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

**4.1** The transport policy associated with this proposal supports active travel and attendance at a local school wherever possible.

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

### **Financial**

**5.1** **Holton Road Resource base budget 2025/26** - The 2025/26 annual staffing budget for the Holton Primary School resource base 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. This budget will be increased annually with pay inflation.

- 5.2 Engagement service** – The annual staffing costs for the new engagement service totals £1,394,162 annually in respect of the following staffing:

	Head Count	FTE
Assistant Headteacher	1	0.9
Teachers	12	11.2
LSAs	9	6.75

- 5.3** This staffing budget of £1,394,162 has been funded from combining the budget allocations of the previous engagement service (£765k), with the current budget allocations for the early intervention base (£226k), the special resource unit at St Joseph’s primary school (£144k) and the budget for the resource base at High Street (Y Bont) (£269k).
- 5.4** The 2025/26 budget for the Y Bont special resource unit at High Street primary school was £268,970 which was delegated to High Street primary school to fund 1 teacher and 5 LSAs and the Age weighted pupil value of 8 pupils in the base. High Street primary would have already funded the costs of resource base staff from April to August by the time the new provision is opened, and therefore 5/12ths of this funding (£112,071) for the 2025/26 financial year will remain within the High Street school budget. The remaining 7/12ths of this funding (£156,899) will be transferred from the High Street budget to the Y Deri budget for 2025/26.
- 5.5** For the 2025/26 financial year, the total budget available for the new engagement service is therefore £1,293,119 and the shortfall of £101,043 will be met from within the Y Deri main budget for 2025/26.
- 5.6** For 2026/27, the staff costs of the engagement service, based on the above staffing structure will be fully funded. Pay inflation will be applied each year.
- 5.7** Any changes to the staffing structure must be agreed within the Directorate to ensure that funding and provision is aligned.

### **Employment**

- 5.8** A pilot provision will commence at Holton Primary School in order to inform decision making. The creation of a new SRB would require continuation of the staffing arrangements put in place for the pilot.
- 5.9** Any proposed changes to staffing would be subject to full consultation with staff and the relevant trade unions where necessary.

### **Legal (Including Equalities)**

- 5.10** 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.

- 5.11** 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.
- 5.12** 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 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.
- 5.13** 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.
- 5.14** Powers for Councils to develop school organisation proposals are governed by the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. The Council is to comply with the relevant provisions in connection with the proposal.

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

- 5.15** 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>

- 5.16** Chapter 2 of Part 3 of the 2013 Act deals with school organisation proposals.
- 5.17** 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.
- 5.18** The proposer must publish a report on the consultation it has carried out in accordance with the Code. The consultation report must summarise each of the issues raised by consultees, responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons; and setting out Estyn's view (as provided in its consultation response) of the overall merits of the proposal.
- 5.19** If a Local Authority decides to proceed with a proposal to make regulated alterations to a maintained school, it must publish proposals to that effect in accordance with the Code (section 48(1)). The proposal must be published by way of statutory notice. Chapter 4 of the Code sets out specific requirements as to how statutory proposals must be published. Proposals must be published on a school day and the objection period must include 15 school days (in addition to the day on which it is published).
- 5.20** Section 49 of the 2013 Act makes provision for any person to object to proposals published under section 48 within the objection period of 28 days. The Council must then publish a summary of all objections made to the proposal and its response to those objections before the end of 7 days beginning with the day of the Council's determination.
- 5.21** 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**

**5.22** 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.

**5.23** 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

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

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

**5.25** 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 place.

**5.26** The statutory guidance, for organisations subject to the Act, sets out the expectations for how the duties should be met: <https://gov.wales/well-being-of-future-generations-wales>

**5.27** The Act itself is available to view online: <https://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

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

**5.28** 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.

**5.29** 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**

**5.30** On the 10 and 11 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.

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

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

**5.32** 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.

**5.33** 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.

**5.34** When making a decision or reviewing a previously made strategic decision made after the 31 March about how to exercise their functions, the Council must show that it has had 'due regard' (giving weight to a particular issue in proportion to its relevance) to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage. Those subject to the duty includes government ministers and departments, Local Authorities and NHS bodies.

**5.35** This would form part of the full Equality Impact Assessment which would be 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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## 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.

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

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

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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 17 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 as the demand, and the pressures on High Street Primary School in operating the base have been disproportionate based on 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 17 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. Utilise the existing EIB building and resources at St Joseph's Primary School to provide part-time placements for pupils with SEMH difficulties and neuro diverse (ND) N, 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:
3. 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.
4. Outreach advice and support for schools with pupils with ND conditions in Year 8-11 to be delivered by Whitmore and Pencoedtre specialist resource base.
5. Deliver specialist interventions for pupils in Year 3 to Year 6 within mainstream schools, building on the successful work already taking place.

6. Through utilising the expertise and specialisms in YYD we are strengthening current provision whilst establishing consistent and continuous provision for SEMH across primary and secondary phases.

### 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 as the demand, and the pressures on High Street Primary School in operating the base have been disproportionate based on 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 local authority-wide 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. This is being addressed in their post inspections action plan. Developing Welsh-medium ALN provision is also recognised as an area for improvement in the LAs WESP.



### 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 pupil 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 the additional learning provision generally made available in mainstream schools 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 will 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. Most 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 school's 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.

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## REVENUE FUNDING

- **Holton Road Resource base budget 2025/26** - The 2025/26 annual staffing budget for the Holton Primary School resource base 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. This budget will be increased annually with pay inflation.
- **Engagement service** – The annual staffing costs for the new engagement service totals £1,394,162 annually in respect of the following staffing;
  - One Assistant Headteacher at 0.9FTE
  - 12 teachers with a combined FTE of 11.2
  - 9 LSAs with a combined FTE of 6.75
- This staffing budget of £1,394,162 has been funded from combining the budget allocations of the previous engagement service (£765k), with the current budget allocations for the early intervention base (£226k), the special resource unit at St Joseph's primary school (£144k) and the budget for the resource base at High Street (Y Bont) (£269k).
- The 2025/26 budget for the Y Bont special resource unit at High Street primary school was £268,970 which was delegated to High Street primary school to fund 1 teacher and 5 LSAs and the Age weighted pupil value of 8 pupils in the base. High Street primary would have already funded the costs of resource base staff from April to August by the time the new provision is opened, and therefore 5/12ths of this funding (£112,071) for the 2025/26 financial year will remain within the High Street school budget. The remaining 7/12ths of this funding (£156,899) will be transferred from the High Street budget to the Y Deri budget for 2025/26.
- For the 2025/26 financial year, the total budget available for the new engagement service is therefore £1,293,119 and the shortfall of £101,043 will be met from within the Y Deri main budget for 2025/26.
- For 2026/27, the staff costs of the engagement service, based on the above staffing structure will be fully funded. Pay inflation will be applied each year.
- Any changes to the staffing structure must be agreed within the Directorate to ensure that funding and provision is aligned.

## 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 will require the school/GB to consider its staffing needs. 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 1: Potential risks and mitigation measures

Risk	Mitigation
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.

## 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 link will be added when the consultation is live.

## 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 2: 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 – 17 October 2025.</b></p> <p>Within 13 weeks of 17 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</p>

	Primary School. Copies of the notice would be distributed to pupils, parents, guardians, and staff members. The school may also distribute the notice by email. The notice would set out the details of the proposals and invite anyone who wishes to object to do so in writing within the specified period.
<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>	Cabinet considers the objection report for final determination on the proposal.  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.
<b>Step 10: Decision letter</b>	Confirmation of the decision and objection report availability will be issued to stakeholders.  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.

### 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 3: 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>17 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 \*\*

*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 4: 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 17 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 17 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 17 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*	<input type="checkbox"/>	Grandparent*	<input type="checkbox"/>	Pupil*	<input type="checkbox"/>
Member of Staff*	<input type="checkbox"/>	Governor*	<input type="checkbox"/>	Local Resident	<input type="checkbox"/>
Other (please specify)					

<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	<input type="checkbox"/>	No	<input type="checkbox"/>	No opinion either way	<input type="checkbox"/>
<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 **17 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>	

Blank area for notes.



## 7. VALE OF GLAMORGAN EQUALITY MONITORING FORM

<b>Gender and Gender Identity</b>				
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			
<b>Disability</b>				
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			
<b>Age</b>				
What is your date of birth?				
<b>National Identity</b>				
<b>National Identity – how would you describe your national identity?</b>				
<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		
<b>Ethnic Group</b>				
<b>Ethnicity – how would you describe your ethnic group?</b>				
<b>White</b>				

<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 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.

			<p>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.</p>
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.