

# CONSULTATION REPORT

## APPENDIX 2

### **1.0 PURPOSE OF THE CONSULTATION REPORT**

This report is prepared in accordance with the Welsh Government's School Organisation Code, statutory document 011/2018. Its purpose is to inform the outcome of the Public Consultation on the proposal to create a Welsh Medium Learning Resource Base (LRB) at Ysgol Gymraeg Rhyd Y Grug.

A consultation period of six weeks was held from the period Monday 22<sup>nd</sup> April, 2024 to Sunday 02<sup>nd</sup> June, 2024 between all stakeholders and interested parties listed.

### **2.0 THE PROPOSAL**

The Council proposes to establish a generic 12-place Welsh Medium Learning Resource Base for pupils in Reception to Year 6 with additional learning needs, to be located at Ysgol Gymraeg Rhyd Y Grug.

The LRB will accommodate pupils with ALN requiring a specialist class placement and cater for a range of different needs including but not limited to ASD, Complex and SEBD. The class will offer short-term and long-term placement options in accordance with the pupil needs.

The LRB will be established in the space identified in Ysgol Gymraeg Rhyd Y Grug from September 2025 and will cater for pupils with ALN whose parents/carers have sought a Welsh Medium education for them, from across the whole County Borough.

Further details of the proposal and the rationale behind it are fully outlined in the Consultation Document that has been published.

<https://www.merthyr.gov.uk/lrbconsultation>

### **3.0 WHO DID WE CONSULT WITH?**

A copy of the Consultation Document, which outlines the full proposal, was sent to the following stakeholders:-

- Parents, carers, staff members and governors
- CSSIW
- Menter Iaith
- Welsh in Education Forum
- Central South Consortium Joint Education Services
- Estyn
- Neighbouring Schools

- Schools within the LA already hosting LRB's
- Welsh Government Ministers
- Assembly Members / members of Parliament / Regional Assembly Members
- Local Councillors
- Welsh Language Commissioner
- Rhieni dros Addysg Gymraeg (RhAG)
- Mudiad Meithrin
- Ysgol Gymraeg Santes Tudful
- Ysgol Gyfun Gymraeg Rhydywaun
- Trade Unions
- Diocesan Director of Education
- Merthyr Tydfil County Borough Council's Transport Department
- National Autistic Society

Parents/carers, governors and school staff were invited to attend consultation events where they would have opportunity to ask questions and learn more about the proposal.

As part of this there were three drop-in consultation events held, two at Ysgol Gymraeg Rhyd Y Grug and one at Ysgol Gynradd Gymraeg Santes Tudful as follows:-

Date	Time	Venue
23rd April 2024	15:30pm - 17:00pm	Ysgol Gymraeg Rhyd-Y-Grug Aberfan Merthyr Tydfil CF48 4NT
25th April 2024	15:10pm - 16:45pm	Ysgol Santes Tudful Heol Pantyffyn Mountain Hare Twynyrodyn Merthyr Tydfil CF47 0HU
02nd May 2024	15:30pm - 17:00pm	Ysgol Gymraeg Rhyd-Y-Grug Aberfan Merthyr Tydfil CF48 4NT

The Council was represented at all sessions with officers from Planning of School Places, Additional Learning Needs (ALN) and Property Services in attendance.

A consultation workshop was held with the school councils at both schools to gather pupils' views about the proposal.

## **4.0 THE CONSULTATION PROCESS**

All stakeholders listed were sent an electronic link to the Consultation document.

All other interested parties were directed to MTCBC web pages where the Consultation document was available, along with a questionnaire to complete.

Social media platforms were also used to promote this Consultation.

## **5.0 SUMMARY OF RESPONSES TO CONSULTATION**

Responses received via the Online Survey have been analysed to identify views and concerns on this proposal and are summarised as follows:-

In total **69** responses were received. All responses were made via the online questionnaire.

Respondents were asked to agree or disagree to the proposal and out of the 69 responses received, the following breakdown has been concluded:

- **In favour of the proposal - 63**
- **Against the proposal – 6**

The consultation has resulted in 91% of respondents being in favour of the proposal.

**Example of positive responses received during the Consultation include: -**

- *It will benefit both ALN children and mainstream children to have a learning resource base'*
- *'As a fluent Welsh speaker working in an English LRB, I feel as though it's important to give children with ALN the opportunity to learn another language. Parents who wish to send their children with ALN to a WM setting should also have the option to do'*
- *'An inclusive and first Welsh language LRB will be a positive development and contribution to the school'*
- *'It is a great opportunity for children in Welsh schools with additional learning needs to have an LRB unit within the Welsh school. Getting them extra support is crucial in their educational years'*
- *'Having had children & grandchildren go through Welsh medium schools I have seen there is a need for help in Welsh for children with additional needs. There is a lack of help for these children in the Welsh language.'*

- *'I support the LRB for Welsh Medium if the child's 1st language is Welsh.'*
- *'My child has additional learning needs and sometimes struggles with school. I've been debating as to whether a unit place would be more suitable for her. She has a twin sister in the school who up to now copes well with school and it would be lovely to be able to keep them in the same school and also give them both the education that suits their needs best.'*
- *'I absolutely fully support the proposal. If my child ever would need to attend an LRB to receive the support in education she needs, I feel it would be more than beneficial that she could have the same valued opportunities to learn in Welsh as her peers. Currently she would have to lose her advantages of Welsh education to move to an English speaking LRB should the need ever arise in the future.'*
- *'Having a Welsh-Medium LRB unit is extremely needed and beneficial to the educational needs of all learners of all abilities'*
- *'As a parent of a child in a Welsh medium school, had they needed to access Welsh Medium ALN support this wouldn't be currently possible, this will allow that to happen for future families'*
- *'It is in keeping with the Welsh language act and Welsh language measure, not to mention the equality act. I am very surprised this is not in place anywhere in Wales yet and I think Merthyr should be leading such good practice'*
- *'I really hope this is approved, so my child will be able to benefit from it for at least his last year at the school.'*
- *'It will be an amazing resource within Rhyd Y Grug which will allow pupils with additional needs to integrate with mainstream pupils while enhancing their learning and socialising experience. This facility is well needed and as I can think of no school better to benefit from this.'*
- *'Support like this is long overdue and I'm hoping that it will make school more manageable for children like mine in the future.'*
- *'It is vital that those who choose a Welsh Medium Education for their children are able to access the same support systems that are so readily available to those who study in English Medium schools'.*
- *'Excellent resource. Excellent proposal for development of Welsh medium education'.*

## **Concerns raised during the Consultation**

The few concerns raised in the feedback can be summarised into two areas

- Question regarding why the location of the LRB couldn't be in Ysgol Santes Tudful instead of Ysgol Rhyd Y Grug or why there can't be two WM LRB classes, one in Ysgol Santes Tudful and one in Ysgol Rhyd Y Grug?
- Concerns relating to school budgets being cut and staff losing jobs in the school, whilst additional funding is being found for the LRB class.

## **LA Response**

The above questions / concerns have been considered by the local authority and the following responses are provided:

### **Why an LRB in Ysgol Rhyd Y Grug rather than Ysgol Santes Tudful? Why not one in each school?**

Ysgol Santes Tudful was not selected as the location for the WM LRB as when the scoping was being undertaken to secure the necessary capital grant funding, Ysgol Santes Tudful had very few surplus places which was projected over the medium to long-term, whereas Ysgol Rhyd Y Grug had a higher % of surplus places, with opportunity to develop existing areas of the school as an LRB class.

Ysgol Rhyd Y Grug was therefore chosen as the destination for the Welsh Medium LRB as part of a larger project involving capital works to increase the capacity of the school, and there was opportunity to access WG capital grant funding to carry out the necessary works to create a suitable LRB provision as part of this project.

Opening a 12-place WM LRB in September 2025 will mean that approximately 9% of all LRB places in primary schools are placed in Welsh Medium schools. Welsh Medium pupils currently account for approximately 12.5% of the total cohort of pupils in primary education in the local authority, which suggests there may be scope to grow LRB provision further in the future.

There is currently no LRB provision at all within the Welsh Medium primary schools in the county borough, and although work is ongoing with WM schools to identify pupils with ALN who may be appropriately placed in an LRB from September 2025, it will take time for a baseline level of demand to be established.

Additional LRB classes in alternative locations can be considered once the first class is established and demand is known. Any subsequent proposals for an additional LRB class would also require a statutory consultation to be carried out.

It should be noted that each LRB class costs the Council approximately £130k per annum and additional funding would have to be secured to operate a second WM LRB class.

## **Why are school staff posts being cut when there is the need for more staff to work in the new LRB?**

School budgets were cut across the County Borough in 2023/24 and 2024/25 as part of the need to find efficiency savings across the Council and set a balanced budget. As a result of this, individual schools have had to make difficult decisions regarding ending temporary contracts and in some cases seeking volunteers for redundancy and/or early retirement. The budget that is being made available to run the new LRB has been approved by Council as it addresses the lack of equity in the current education provision across the County Borough. This budget will be allocated to Ysgol Rhyd Y Grug from September 2025 and will enable the school to run the class without impacting the school's current budget.

## **6.0 VIEWS EXPRESSED BY CHILDREN AND YOUNG PEOPLE**

Consultation workshops were arranged with the School Council to gather their views about the Proposal. The pupils were keen to ask questions with such examples as:-

*'It's good as it will be the first in Merthyr'*

*'I think it's a good idea'.*

*'I like the idea of the sensory / therapy room'*

*'How much money will it cost?'*

*'What kind of children will be coming there?'*

*'What teachers will be teaching them?'*

*'Will there be children with Down's syndrome?'*



## **7.0 THE VIEW OF ESTYN (HIS MAJESTY'S INSPECTORATE OF EDUCATION AND TRAINING IN WALES) OF THIS PROPOSAL.**

Estyn has provided the following response to this consultation process:

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



*Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.*

*The proposal is to establish a Welsh medium learning resource base at Ysgol Gymraeg Rhyd Y Grug.*

### **Summary/ Conclusion**

*Estyn considers that the proposal is likely to improve the standard of education provision in the area.*

### **Description and benefits**

*The local authority has set out a clear and detailed rationale for its proposal. There is currently no such Learning Resource Base (LRB) provision within the Welsh-medium primary schools. However, given that Welsh medium pupils account for approximately 12.5% of the total cohort of pupils in primary education in the local authority it would be reasonable to expect there to be a pro-rata equivalent supply of LRB places for Welsh medium pupils with additional learning needs (ALN). The local authority's Welsh in Education Strategic Plan (WESP) 2022-2032 states the aim to establish a Welsh medium LRB in a mainstream primary school in order to increase and improve the ALN provision within Welsh medium schools and provide an equitable offer of education to the children and young people and public of Merthyr Tydfil who may wish to access Welsh medium education. This would support growth in Welsh medium primary education, supporting the Council's WESP.*

*The local authority provides a clear description of the proposal and a projected timetable for statutory procedures. The Council proposes to establish a generic 12-place Welsh medium LRB for pupils aged between Reception and Year 6 with additional learning needs, to be located at Ysgol Gymraeg Rhyd Y Grug. The LRB will accommodate pupils with ALN requiring a specialist class placement and cater for a range of different needs including but not limited to Autistic Spectrum Disorder (ASD) and Complex. The class will offer short-term and long-term placement options in accordance with the pupil needs.*

*The local authority identifies clearly and fairly the expected benefits and disadvantages when compared with the status quo. For example, it noted that some pupils accessing the base will be from across the primary phase age group. To support this further it has noted clearly within the proposal that the new configuration of the LRB will include two classroom spaces with corresponding quiet/breakout rooms in addition to a canopied outside learning space for pupils. This will ensure maximum flexibility to meet pupil needs in addition to future proofing the facilities. The benefits of the proposal are detailed and addresses the need to establish a Welsh medium LRB to provide an equitable offer for pupils with ALN.*

*The local authority identifies appropriately the potential risks linked with the proposal if there is a low or high demand for places. There are clear mitigating factors noted for a low demand for places and work is currently ongoing with Welsh medium*

*schools to identify potential pupils who may have ALN and would benefit from accessing an LRB place from September 2025. In addition, the proposer has noted there could be a potential risk of a high demand for places. However, there is no further detail in the proposal on what options would be available to increase the provision and where. The proposal only states that the local authority will review demand and assess other opportunities where appropriate.*

*The local authority does not set out other suitable alternatives to its proposal. They note that they have secured Welsh medium Capital grant funding from Welsh Government (WG) to expand the size of the Ysgol Gymraeg Rhyd Y Grug's capacity to 329 increasing the admission number to 47, and making the school 1.5 form entry, in order to grow the supply of Welsh medium primary places overall. As part of the Welsh medium Capital grant project, they have secured funding to develop an LRB classroom within the school. There are no details of suitable alternatives, for example, Ysgol Gynradd Gymraeg Santes Tudful (the only other Welsh medium school in the local authority). There are no details in the proposal as why they have discounted them.*

*The proposer has considered appropriately the impact of the proposal on learner travel arrangements. Under these proposals there are no plans to change the council's policy on the transport of children to and from schools. Home to school transport will be provided for children who are allocated a place in the LRB by the ALN Panel if either the distance from home to school is at least 2 miles, or the distance from home to school is less than 2 miles but the pupil has been assessed by ALN panel as being unable to walk to school due to their ALN, disability and/or medical condition.*

*The proposal shows an appropriate breakdown over time of surplus places at Ysgol Gymraeg Rhyd Y Grug where the Welsh LRB will be based. The projected number on roll data decreases over time. However, the proposal notes that the co-location of a Cylch Meithrin on the site of the school will help support additional demand for nursery and primary education places, helping it to grow over the medium to long term. In addition, as the local authority has secured Welsh medium capital grant funding to increase the admission numbers of the school, it appears these surplus places will reduce as the growth for Welsh medium primary places will increase overall.*

*The proposal takes good account of the impact of the proposals on Welsh medium provision within the local authority and the extent to which the proposal supports the targets in the local authority's WESP. It identifies that establishing a specialist ALN provision through the medium of Welsh is a priority for the Council, as reflected in the current 10-year WESP 2022-2032.*

*The proposal identifies the financial costs of the proposal and estimates the cost of establishing a Welsh LRB class. The local authority notes that as part of the Welsh medium Capital grant project they have secured the funding to develop a LRB classroom within the school. The revenue funding required to run an LRB class has recently been reviewed by the Schools Budget Forum in consultation with*



*Headteachers of all LRB classes across the LA. Following this review Council approved an increase to funding LRB classes from April 2024. The required budget to fund the Welsh medium LRB class at Ysgol Gymraeg Rhyd Y Grug has been secured within the Council's revenue budget.*

### **Educational aspects of the proposal**

*The proposal identifies in useful detail the outcomes of the most recent Estyn inspection of Ysgol Gymraeg Rhyd Y Grug and uses PLASC data to highlight the number of ALN pupils at the school over the last four years. However, it does not include the ALN data of Ysgol Gynradd Gymraeg Santes Tudful pupils, who would have the opportunity to access the specialist ALN provision through the medium of Welsh at Ysgol Gymraeg Rhyd Y Grug.*

*The local authority considers appropriately the impact of the proposals on the quality and standards in education, including pupil standards, wellbeing, teaching and learning experiences, care support and guidance and leadership and management. For example, the proposal identifies the quality of education in the LRB will be enhanced due to the expertise of the specialist staff working within the provision, which should improve outcomes for pupils through differentiation and modification of the curriculum. The proposal should result in improved teaching and learning experiences through providing pupils with a small class environment with a high adult to pupil ratio that provides a more flexible and responsive provision to meet their needs. The LRB should provide pupils with opportunities for integration into mainstream classes as and when possible. It will also aim to provide learners with a broad, balanced, and relevant curriculum, whilst also having their exceptional needs met in as inclusive a way as possible.*

*The proposal includes mixing pupils with different categories of need within the generic Welsh medium LRB. The local authority noted the disadvantage of different age groups accessing the base but did not note the challenges of pupils with different categories of need accessing the resource base. However, the proposal highlights clearly that the configuration of the LRB will include two classroom spaces with corresponding quiet/ break out rooms, outside learning spaces, an accessible WC, hygiene room and sensory room. Therefore, the facilities appear to be flexible to be able to meet the needs of the pupils.*

*The proposer has considered well how the LRB will manage pupils' interactions with their peers in the mainstream setting. The LRB will be integrated fully with the mainstream provision at Ysgol Gymraeg Rhyd Y Grug, providing an appropriate environment in which pupils can develop and thrive among their peers and have increased and supported access to the mainstream curriculum, where appropriate. The ethos of the LRB is to provide specialist support to the individual pupil based on their level of need, with the intention, in some instances, of reintegrating the individual back into a mainstream class where appropriate. However, there is no detail in the proposal on how the local authority will manage the integration of pupils*

*from Ysgol Gynradd Gymraeg Santes Tudful as part of this process and this could have a negative impact on their wellbeing.*

*The proposed building meets the sensory and social needs of the pupils through the inclusion of a sensory room and quiet/ breakout spaces. Each class will also have a canopied external learning space for pupils. However, there is no mention in the proposal regarding how the lighting and acoustics will accommodate and adapt to the needs of the pupils. In addition, the location of the new LRB is next to the maintenance room and this could have an adverse effect on the pupils.*

*The proposal would ensure that disruption to learners is minimised as the local authority will support the school to recruit appropriate teaching and support staff in readiness for September 2025 and this will ensure that any pupil transitions can be effectively facilitated.*

*The proposal demonstrates how the local authority will ensure that all school staff have an understanding of, and skills relating to, the learning requirements of children with ALN, primarily through a programme of continuous professional development and, where appropriate, opportunities for accreditation with nationally recognised qualifications.*

## **LA Response**

In relation to the points raised noting that no information has been provided regarding why Ysgol Santes Tudful was discounted as the location of the WM LRB please refer to the LA Response to the consultation feedback in section 5 above that provides this rationale.

With regard to the options to increase LRB provision should demand warrant this then options would be considered at Ysgol Santes Tudful, subject to updated pupil projections over the long-term, and potentially at Ysgol Rhyd Y Grug if there are future proposals to expand the school further in support of the Council's WESP aims to increase the number of primary aged learners accessing WM education.

In relation to the absence of ALN data for YST pupils, this has been provided below.

PLASC Details	2020	2021	2022	2023	2024
No. School Action	15	9	9	3	4
No. School Action Plus	17	4	10	6	7
% ALN	7.3%	3.2%	4.7%	3.0%	3.3%

% ALN Pupils with IDP			0.0%	23.1%	14.3%
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In relation to the challenges of accommodating pupils with different categories of need and appropriately meeting their needs within the learning environment, as Estyn note, this is a challenge of the proposal and has been considered with the configuration of the LRB which will include two classroom spaces with corresponding quiet/ break out rooms, outside learning spaces, an accessible WC, hygiene room and sensory room. The facilities have been flexibly designed to be able to meet the needs of the pupils.

In relation to the reintegration of pupils into mainstream and how this will be managed for YST pupils. If reintegration occurs for pupils from YST catchment then this will be managed in partnership with the parents/carers, pupil, LRB class teacher and both schools to agree whether this reintegration should be to YST as the catchment school or to Ysgol Rhyd Y Grug as the host LRB school. This will be managed on a case-by-case basis. If a pupil from YST catchment is reintegrated to YST this will be managed carefully to ensure the mainstream environment and support provided is appropriate for the pupil.

In relation to further information being required regarding how the lighting and acoustics will accommodate and adapt to the needs of the pupils and regarding the location of the new LRB being next to the maintenance room having a potentially adverse effect on pupils, the following should be noted: The design of the LRB is ongoing and is currently at the RIBA Stage 3 point. The design is progressing through each stage with close involvement from the LA ALN team. Lighting will be upgraded in this area and acoustic treatments will be in place on classroom walls to ensure noise levels around the school do not impact learners in the LRB. Storerooms and WCs have been designed as noise buffers to the classroom and group room spaces to further minimise noise impact. The project team are looking to meet with the Guide Dogs Association to gain further input in Stage 3 to ensure pupils with visual impairments are catered for in the design beyond standard DDA compliance.

## 8.0 CONCLUSION

Following due consideration of the consultation responses received, the local authority will recommend the Proposal consulted on to Cabinet, requesting that a statutory notice be published to establish a generic 12-place WM LRB at Ysgol Gymraeg Rhyd Y Grug from September 2025.

The publication of the statutory notice will take place no earlier than two-weeks following the publication of this Consultation Report.

Following the publication of the statutory notice, a 28-day objection period will then run.

If any objections are received, due consideration will be given to these as part of a final report to Cabinet in November, when a final determination will be made regarding the proposal.