

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 formalise a Foundation Phase Autistic Spectrum Disorder (ASD) Learning Resource Base (LRB) at Dowlais Primary School and a Key Stage 3 / 4 Complex ASD LRB at Cyfarthfa High School.

A consultation period of six weeks was held from the period Monday 11th November 2024 to Sunday 22nd December 2024, between all stakeholders and interested parties listed below.

2.0 THE PROPOSAL

The Council proposes to formalise a generic 10-place ASD LRB for pupils in Reception to Year 6 with additional learning needs, at Dowlais Primary School and also an eight-place Complex ASD LRB for pupils in Yrs 7-11 with additional learning needs, at Cyfarthfa High School.

Both provisions will accommodate pupils with ALN requiring a specialist class placement and cater ASD and Complex ASD. The classes will offer short-term and long-term placement options in accordance with the pupil needs.

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
- 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
- Dowlais Primary School
- Cyfarthfa High School

- 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 two drop-in consultation events held, one at Dowlais Primary School and one at Cyfarthfa High School as follows:-

Date	Time	Venue
20 th November 2024	15:30pm – 17:00pm	Dowlais Primary School High Street Merthyr Tydfil CF48 3HB
18 th December 2024	15:30pm – 17:00pm	Cyfarthfa High School Cae Mari Dwn Queens Road Merthyr Tydfil CF47 0LS

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

Consultation workshops were held with the school council at Dowlais Primary School 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 - DOWLAIS PRIMARY SCHOOL

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

In total **82** 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 82 responses received, the following breakdown has been concluded:

- **In favour of the proposal - 76**
- **Against the proposal – 6**

The consultation has resulted in 92.7% of respondents being in favour of the proposal.

Example of positive responses received as a result of the Consultation include:-

- *‘It will benefit both ALN children and mainstream children to have a learning resource base’*
- *‘An amazing unit that helps so many children’*
- *‘My son has attended the LRB unit in Dowlais since January 2024 and has made significant progress since being there. The staff are understanding and accommodating of his needs and continually work to put the needs of the children first whilst also providing them with an Education’*
- *‘My daughter is in the class and I think they are doing a brilliant job there’*
- *‘This LRB class in Dowlais Primary School has been absolutely amazing with our granddaughter she has come on so well with communicating with others the teachers are amazing, kind and very caring.’*
- *‘I support the LRB as it makes a big difference to pupils needing additional support.’*
- *‘I fully support the idea to make the ASD LRB a permanent thing and formalise it. My niece currently attends there and ever since she has joined she has progressed hugely in terms of her communication and understanding.’*
- *‘The LRB setting at Dowlais Primary School is an essential part of our child’s development. Having access to such a specialised unit has been a game changer in terms of progression and learning. It is a fantastic resource.’*
- *‘I currently provide transport for 3 pupils that attend the new LRB in Dowlais Primary School and have seen first hand how much the children have come on.’*

- *‘During year 1 of my college course I was able to go on placement and experience the dynamic of Dowlais Primary’s LRB unit which was amazing. To experience how much the staff do for the children was so impactful and how amazing each of their personalities are and how talented each of them are to communicate in such diverse ways. I feel that the wellbeing of the children and their families is at its best knowing how good of hands their child is in. I enjoyed myself so much spending time with each of their amazing personalities that I returned to volunteer 2 days a week from April to start of July. It truly is one of the best support networks I have seen in the education sector.*
- *‘I think this unit should stay open to help the non verbal children as they coming on so well in their classes.’*

Concerns raised from the Consultation

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

- Question regarding the safety of mainstream pupils.
- Concerns relating to the LRB being removed and placed elsewhere which is detrimental to ASD pupils.

LA Response

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

Safety of Mainstream Pupils

Dowlais Primary School has safety measures in place to keep all children safe. Children in the LRB enjoy an exclusive outdoor play area and also there is a high pupil/staff ratio.

Removal of the LRB

The LA has no intention of moving the LRB once formalised. This will give ASD pupils consistency with location and staff.

6.0 VIEWS EXPRESSED BY CHILDREN AND YOUNG PEOPLE – DOWLAIS PRIMARY SCHOOL

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:-

'The smaller class is less overwhelming for the pupils'

'We are an inclusive school'

'The LRB keeps the children happy and calm'

'It helps the children be the best they can be'

'We love having the LRB in our school. Lots of LRB children enjoy visiting other classes and areas of the school such as out forest school area'

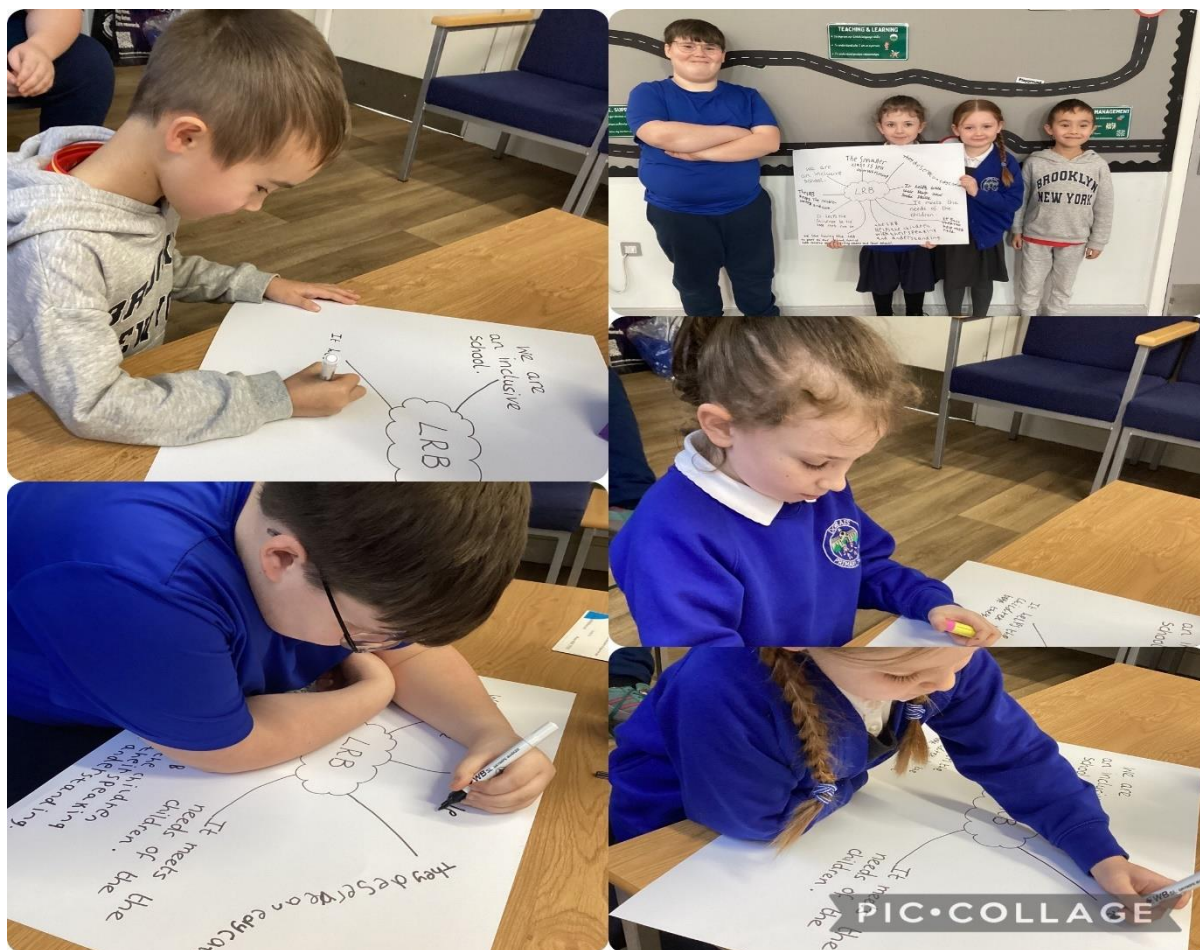
'The LRB helps children with their speaking and understanding'

'It gives them the help they need'

'It meets the needs of the children'

'It helps with their play and social skills'

'Everyone deserves an education'



7.0 SUMMARY OF RESPONSES TO CONSULTATION – CYFARTHFA HIGH SCHOOL

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

In total **52** 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 52 responses received, the following breakdown has been concluded:

- **In favour of the proposal - 48**
- **Against the proposal – 4**

The consultation has resulted in 92.3% of respondents being in favour of the proposal.

Example of positive responses received as a result of the Consultation include:-

- *‘It makes a huge impact on the children that go there’*
- *‘I have a boy in Cyfarthfa High School who has autism and adhd as well as dyslexia. I think this is such an asset to the children who need it, the school has been amazing with my son’*
- *‘My daughter is in the class and I think they are doing a brilliant job there’*
- *‘What a fantastic facility to have to help young people that need additional support.’*
- *‘I believe it is a much needed provision in the borough.’*
- *‘My nephew attends and this setting has made a huge positive impact on his learning.’*
- *‘The new LRB provision is a really good development and provides an excellent learning space for pupils with additional learning need who would need to be educated out of county without this provision’*
- *‘I don’t want the unit to close. I have an autistic granddaughter. The unit has done tremendous things to benefit her.’*
- *‘The unit is helping my younger ASD sibling who has complex needs. It has helped their confidence and they finally like going to school.’*

Concerns raised from the Consultation

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

- The LRB is not big enough.
- The school being in special measures.

LA Response

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

LRB Size

Cyfarthfa High School LRB will be continually monitored by the LA ALN department. Entry to the LRB is assessed by LA panel and should there be an increase in need for specialist placement, this will be considered further at that time.

Estyn Inspection

Although the school is currently in special measures, there were some strengths identified in terms of ALN. The proposal to formalise the LRB is likely to strengthen its overall ALN provision.

8.0 THE VIEW OF ESTYN (HIS MAJESTY'S INSPECTORATE OF EDUCATION AND TRAINING IN WALES) OF THIS PROPOSAL – BOTH PROPOSALS

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.

Summary/ Conclusion

The proposal is by Merthyr Tydfil County Borough Council to formally establish Learning Resource Bases (LRB) at Dowlais Primary School (Foundation Phase) and Cyfarthfa High School (Key Stage 3 /4) to cater for pupils with Autistic Spectrum Disorder (ASD), following the piloting of these provisions from September 2023.

It is Estyn's view that this proposal is likely to at least maintain the standard of education provision and outcomes for pupils with Additional Learning Needs in the area.

Description and benefits

The council has presented a suitable rationale outlining the reasons for the proposal. The council believes that this proposal will benefit pupils living across the county borough who require specialist ALN provision within mainstream settings to meet their additional learning needs. The LRB in Dowlais Primary School will increase the overall LRB capacity within the county borough meeting the needs of pupils with ASD. It will also ensure a flow through provision if needed within a single primary setting for those pupils placed in the Foundation Phase LRB. The LRB in Cyfarthfa High School will establish a new type of provision, responding to growing need, for an LRB which meets the needs of pupils with ASD but who also have associated behavioural difficulties that require a smaller class size than the existing secondary LRB for pupils with ASD.

The council has provided a suitably detailed description of the proposal. It has presented a background to the proposal and included an estimated timetable for statutory procedures.

The council has appropriately outlined the advantages and disadvantages of this proposal. The main advantages cited are to increase the number of LRB places for learners with ASD and effective use of space within the two schools without impacting on the schools' capacity. Other advantages, according to the consultation document, would be: effective use of space within the two schools (without impacting on capacity) and increased opportunities for staff development (the level of provision in the LRB and the proportionate ability and skill of staff are likely to be of benefit to the wider school). The council also states that the piloting of these arrangements in the two schools during 2023/24 have been successful.

The disadvantages included in the proposal are that some pupils with ALN can find change difficult (the pupils may find moving schools unsettling) and the length of time required for compliance with the statutory school organisation process will entail a delay in establishing the proposed LRBs. The risks associated with establishing LRBs in both schools are that there is a possibility of high demand for places at both settings and the council proposal states that these risks will be mitigated by the Local Authority reviewing demand and assessing other opportunities to increase provision, where appropriate.

The council has considered the impact of the proposal on transport arrangements. Under these proposals, there are no plans to change the council's transport policy. Home to school transport will be provided for children who are allocated places in the LRBs if the distance from home to school is at least 2 or 3 miles or the distance is less than 2 or 3 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 council has usefully demonstrated the impact of the proposal on surplus places. Dowlais Primary School has 146 pupils on roll currently and has 12 surplus places. Cyfarthfa High School has 799 pupils on roll currently and has 91 surplus places. Based on current figures, this means that both schools would have capacity for pupils in the LRBs, based on the proposal of up to 10 placements in Dowlais LRB and 8 placements in the Cyfarthfa LRB.

The proposal also includes details of the language medium of ALN provision within the county's LRBs. Both Dowlais Primary School and Cyfarthfa High School are English medium providers and, therefore, there would be no provision for Welsh first language pupils with ALN in these Learning Resource Bases. The LA is also in consultation currently regarding the establishment of a Welsh medium primary LRB.

The council has considered the financial implications of the proposal appropriately. The required budget to fund the LRB classes has been secured within the Council's revenue budget.

The council states that it has conducted an integrated impact assessment as part of the proposal, and that this is available on request. Including a link to the assessment would have made this document more accessible to consultees.

Educational aspects of the proposal

In terms of the proposal to establish a permanent LRB at Dowlais Primary School, the council appears to have considered the quality of outcomes, provision and leadership and management at the school. They have included the outcomes of the school's last Estyn inspection report in October 2016 which returned good summative judgements for the school's performance at that time. The school was also judged to have good prospects for improvement at the time of the inspection. With regard to the LRB, the October 2016 Estyn report reads as follows: 'Pupils in the Learning Resource Base receive good support for moderate learning difficulties in literacy and numeracy. These pupils have access to mainstream lessons and receive a balanced curriculum. This provision is well planned and organised according to the needs of individual pupils. As a result, these pupils often make good progress in relation to their individual learning targets'. However, it is worth noting that this evaluation is now eight years old.

Cyfarthfa High School is currently in special measures and Estyn is monitoring the school's progress carefully by conducting regular monitoring visits. There were some strengths identified in terms of ALN provision during the May 2024 inspection, 'Pupils in the Learning Resource Base benefit from a range of interventions to support their well-being'. However, there were some areas for improvement in terms of ALN provision noted as well, 'The school is beginning to take a strategic approach to developing

provision for pupils with additional learning needs (ALN)’ and ‘processes to track and evaluate the progress of ALN pupils in lessons across the school are underdeveloped’. The proposal to establish a permanent LRB at the school is likely to strengthen its overall ALN provision. However, given that the school is in statutory category, the local authority does not refer to the possibility that the school may require extra support to establish a LRB if the proposal is accepted.

The council’s aim in establishing these two LRBs to ‘provide learners with a broad, balanced and relevant curriculum, whilst also having their additional learning needs met in as inclusive a way as possible’ is a positive development. The proposal does not provide information about the induction and transfer arrangements for pupils moving from the primary to the secondary LRB provision.

The proposal aligns with the national ALN reform’s emphasis on a pupil-centred approach: ‘The LRBs at Dowlais Primary School and Cyfarthfa High School will be established within the mainstream provision at each school, providing an appropriate environment in which pupils can develop and thrive with access to the mainstream curriculum, where appropriate. This approach generates and maximises opportunities

for inclusion within the mainstream, while meeting the individual learning, emotional and social needs of pupils placed’.

9.0 CONCLUSION – BOTH PROPOSALS

Following due consideration of the consultation responses received, the local authority will recommend both Proposals consulted on to Cabinet, requesting that a statutory notice be published to formalise both Dowlais Primary School FP ASD LRB and Cyfarthfa High School Key Stage 3 / 4 Complex ASD LRB with effect from 28th April 2025 i.e., the start of the Summer Term.

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, when a final determination will be made regarding the proposal.