

Newport City Council

School Reorganisation Proposal

Consultation Report

Proposal to establish a specialist base for pupils with Autistic Spectrum Disorder at Llanwern High School from September 2023

Formal Consultation Period:

23 November 2022 – 6 January 2023

Purpose

This report is published in line with the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, November 2018.

This consultation report includes the following sections:

- The Proposal
- Stakeholder Engagement
- Learner Voice
- Drop-in Sessions
- Consultation Responses
- Estyn's Response
- Impact on the Welsh language
- Assessment of the Proposal
- Recommendations
- Appendices

The Proposal

This consultation report concerns a proposal to establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023.

Stakeholder Engagement

An invitation to take part in the statutory consultation was issued to the stakeholders outlined below, with a link to the consultation pack on the Council's website sent by e-mail:

- Parents, carers and guardians of pupils attending all schools affected or potentially affected by this proposal;
- Pupils attending all schools affected or potentially affected by this proposal;
- Parents, carers and guardians of pupils with a diagnosis of ASD and attending specialist classes in mainstream primary schools in Newport;
- Parents, carers and guardians of pupils currently educated within ALN classes in mainstream primary schools;
- Members of staff currently employed at all schools affected or potentially affected by this proposal;
- Neighbouring Local Authorities across the South East Wales Consortium area;
- The Headteacher and Governing Bodies of all Newport schools;
- All Newport City Council elected members;
- All Newport Community Councils;
- The Welsh Ministers;
- Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by the school subject to the proposal;
- Other Local Authorities across the South East Wales Consortium region, including relevant Transport departments;
- The South East Wales Education Achievement Service;
- The Church in Wales, Diocese of Monmouth;
- Roman Catholic Archdiocese;
- Estyn;
- Teaching and staff trade unions representing teachers and staff at all Newport schools;
- The Early Years Development and Childcare Partnership
- The Police and Crime Commissioner for Gwent;
- The Welsh Language Commissioner;
- Gwent Police;
- South Wales Fire and Rescue Service;
- Aneurin Bevan University Health Board;
- Public Health Wales;
- Newport Serennu Centre;
- SNAP Cymru;
- Gwent Association of Voluntary Organisations;
- Preventative Services.

Affected Schools

The school directly affected by this proposal is **Llanwern High School**.

Distribution of Information

In addition to the formal (main) consultation document, a Children & Young People's Everyday Summary version and ASD friendly version were also produced, to help ensure that the consultation process was inclusive and accessible to all concerned. All documents were available bilingually in Welsh and English.

Hard copies of the full consultation document, the Children and Young People's Everyday Summary version, and the ASD friendly version were provided to Llanwern High School and the six primary schools within the Llanwern High School cluster (Alway Primary School, Eveswell Primary School, Llanmartin Primary School, Milton Primary School, Ringland Primary School and Somerton Primary School) to be available for staff, pupils and parents.

Hard copies could also be requested by emailing school.reorg@newport.gov.uk, and these were available bilingually in Welsh and English, although no such requests were received.

The consultation information has been shared on the Newport City Council's Facebook and Twitter pages and was included in the Residents Newsletter on 1st December 2022. The information was also shared on Llanwern High School's website.

Learner Voice

The Council is keen to gain the views of learners, and this was facilitated with pupils from the School Council at Llanwern High School on Tuesday 6th December 2022. A pupil voice session to include pupils with ASD was considered. However, as pupils with a diagnosis of Autistic Spectrum Disorder can have high anxiety levels and struggle with change, and because the proposal is only at the formal consultation stage, this was not undertaken. If the proposal moves to the next stage, this will be re-considered.

The following attendees were present:

- Approximately 35 pupils
- Headteacher
- Education Transformation Manager
- 2 Teacher Advisers (ALN)
- ALN Manager
- Education Information and Development Officer
- LA Governor

The Council officers attending the session introduced themselves to the pupils, and the session was led by one of the ALN Teacher Advisers. To start, there was a discussion about what ASD is and how it can affect people. The Education Transformation Manager then explained the proposal to the pupils. The pupils were then given the opportunity to ask questions, which are outlined in the table overleaf.

Question/Comment	Council's Response
Why move the SLC to a different location?	The SLC (Specialist Learning Centre) is something that has been created informally by the school to support a group of pupils with additional learning needs. Currently this is located in an area of the school that was originally established as an ALN base for pupils with SEBD (Social, Emotional and Behavioural Difficulties). This area therefore has the facilities required for the proposed ASD base, such as a dedicated kitchen area and toilets etc. However if the proposal goes ahead, a suitable alternative area will be identified by the school to enable the SLC to be relocated.
The proposal may affect pupils currently in the SLC, and therefore the SLC needs to be replicated elsewhere in the school.	The Council and the School are currently exploring options for the relocation of this provision to ensure that the School can continue to meet the needs of this group of learners.

The pupils were given the opportunity to complete hard copies of the Consultation Response Pro-forma during the session, and 20 responses were received as a result. A number of similar comments were raised by pupils, and these are summarised below. However all responses supported the proposal.

- Good opportunity to increase support for pupils with ASD;
- Children with ASD need additional support and teaching space;
- The new provision might reduce instances of bullying;
- The base will offer a safe environment for pupils who might be otherwise overwhelmed;
- The current SLC provision needs to be relocated elsewhere in the school to reduce any impact on this group of learners.

The Council is very grateful to the staff and pupils who took part in this session and would like to thank them for their valuable contributions to this consultation process.

Drop-in Sessions

The Council facilitated two drop-in sessions as outlined overleaf, and these were publicised via the Council's website and within all correspondence and documentation relating to the proposal. The drop-in sessions were an opportunity for attendees to ask questions and for Council officers to explain the proposal in greater detail.

Table 1: Drop-in Sessions

Location	Date & Time	Session
Llanwern High School – Main Hall	Tuesday 6 December 2022 09:15 – 10:30	Drop-in
Llanwern High School – Lecture Hall	Thursday 15 December 2022 15:15 – 16:30	Drop-in

Drop-in Session 1 – Tuesday 6th December 2022

The first drop-in session, held at Llanwern High School, was attended by 10 stakeholders, made up of parents and carers, the Headteacher and staff employed at the school, and governors, and was supported by the following six officers from across the Education Service:

- Assistant Head of Education - Resources
- ALN Manager
- Education Transformation Manager
- Education Information and Development Officer
- 2 Teacher Advisers (ALN)

The stakeholders in attendance expressed concerns that the proposal would entail the closure of the existing school SLC provision, and that this would result in the pupils currently accessing this provision being returned to large mainstream classes. The officers present explained that this was not the case, and that the existing SLC provision would need to be relocated within the school. The officers also explained that the Council considers that there is sufficient capacity within the current school building to facilitate this. Stakeholders expressed frustration and anxiety that a solution for the relocated SLC provision had not been shared as part of the proposal. One of the governors present also queried the validity of the consultation process, but officers confirmed that it was being conducted fully in accordance with the requirements of Welsh Government's School Organisation Code.

All of the questions raised during the session were answered by the officers present, and were followed up with a Frequently Asked Questions document that was prepared on published on the relevant webpage of the Council's website. This document is included at Appendix A of this Consultation Report.

Hard copies of all versions of the consultation document were available at the session. The consultation response pro-forma was also offered to all those who attended, although none were completed during the session.

Drop-in Session 2 – Thursday 15th December 2022

The second drop-in session, also held at Llanwern High School, was attended by 16 stakeholders, including parents and carers (predominantly of pupils currently accessing the informal SLC provision), the Headteacher and staff employed at the school, and governors, alongside the following officers from the Council's Education Service:

- Assistant Head of Education - Resources
- ALN Manager
- Education Transformation Manager
- Education Information and Development Officer
- 2 Teacher Advisers (ALN)

The majority of individuals attending the session were very anxious and unhappy. It became apparent that the parents and carers in particular were of the view that the proposal related to the closure of the existing informal SLC, rather than the establishment of a formal base for pupils with ASD, and the subsequent relocation of the SLC. As a result it was very difficult for the officers present to answer the questions that were asked of them.

The main points raised during the session, and the Council's responses, are shown in the following table:

Comment/Question	Council's Response
What is the alternative provision that will occupy the area where the SLC currently occupies?	This proposal is to create a new 20-place specialist Autistic Spectrum Disorder Base which supports the increasing demand for specialist education provision across the city of Newport.
If the proposal was implemented, would the current SLC pupils be split up and mix with mainstream pupils in mainstream classes?	This would be a decision for the school, but we believe the SLC could re-locate to an alternative area of the school rather than pupils being introduced to mainstream classrooms.
Is it possible for the SLC provision to be mirrored elsewhere within Llanwern High School?	It is possible that the SLC would re-locate to an alternative area of the school. The school leadership team and Council officers are currently considering the most suitable location for this.
Will there be funding available from Newport City Council for Llanwern High School to recreate the SLC provision within the school?	The establishment of the proposed base should not result in the school having to fund physical changes to the building. As such the Local Authority will seek to cover any such costs.
What are the criteria for the pupils who will access the proposed ASD base?	The base is expected to provide for pupils with a confirmed diagnosis of ASD who are unable to access mainstream education with adult support. At entry to Year 7, pupils would predominantly be at P-Scale 7 National Curriculum Level 1.
Can parents appeal the decision if they deem the relocated SLC provision unsuitable?	If a Parent of a child with ALN is dissatisfied with the provision their child is receiving in school, an interim review can be called. In this case, the LA would work with the school to resolve any concerns.

Hard copies of all versions of the consultation document were available at the session. The consultation response pro-forma was also offered to all those who attended, although none were completed during the session.

Consultation Responses

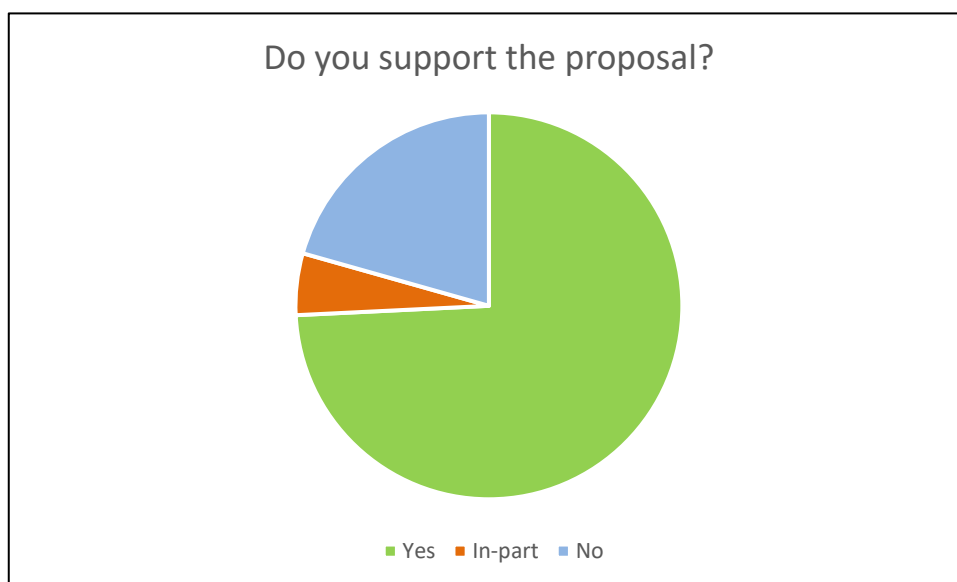
Overall, a total of 99 responses were received during the consultation period.

97 responses were received via the response pro-forma (see Appendix B) online and via hard copies, by a variety of stakeholders including:

- Parents/Carers
- Family members and friends
- Newport residents
- People with specialist experience of Autism
- Local Authority employee
- Staff employed at Llanwern High School
- Headteachers and staff employed at other Newport schools
- Parent Governor at Llanwern High School
- Pupils at Llanwern High School

There were also 2 written responses received by email from a School Trade Union and Estyn (His Majesty's Inspectorate for Education and Training in Wales).

'Do you support the proposal to establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023?'



72 out of 97 respondents (74%) supported the proposal, with many of the responses also providing comments that the additional provision is vital to support learners with specific learning needs and that the proposal would benefit the local community.

5 out of 97 respondents (5%) supported the proposal in part, but noted that:

- the proposed provision was not sufficient,
- the Council should also consider suitable provision for learners with other additional needs, and
- the proposal should not result in learners currently in the SLC being moved into mainstream classes.

In response to these comments, the Local Authority recognises that there is a discrepancy currently between Primary and Secondary ALN provision and the proposed ASD Base at Llanwern High School is an acknowledgement of this and a step towards ensuring that wider secondary provision is available.

Analysis of Local Authority data over the past 5 years has demonstrated an increasingly complex ASD population. As such, the Local Authority is committed to ensuring that the ASD provision within the city reflects increasing demand in order to appropriately meet the needs of the majority of pupils within the City, without the requirement for Out of County placements. The Local Authority continually reviews the data trend analysis to inform future decisions with regards ALN provision within Newport.

The proposal to establish a new specialist ASD base is in addition to the informal SLC facility currently provided by the school. The proposed area within Llanwern High School for the ASD Base would mean the relocation of the SLC to an alternative area of the school rather than pupils being introduced to mainstream classrooms.

20 out of 97 respondents (21%) did not support the proposal; some of these put forward additional views and questions, which have been outlined below and overleaf:

Comment / Question	Number of Similar Comments	Council's Response
Pupils currently accessing the SLC base should not have to return to mainstream to facilitate the establishment of the ASD base as they themselves have very complex needs and will not cope in a mainstream setting.	8	The proposal to establish a new specialist ASD base is in addition to the SLC facility currently provided by the school. The proposed area within Llanwern High School for the ASD Base would mean the re-location of the SLC to an alternative area of the school rather than being introduced to mainstream classrooms.
This proposal will have a negative impact of the pupils who are currently placed in the SLC.	3	The proposal to establish a new specialist ASD base is in addition to the SLC facility currently provided by the school. The proposed area within Llanwern High School for the ASD Base would mean the re-location of the SLC to an alternative area of the school rather than being introduced to mainstream classrooms.
The proposal is not inclusive and instead will segregate young people with Autism from mainstream education. Funding could be better used to train staff in all schools to better understand the needs, requirements	1	In order to provide support for ASD learners who are high functioning, the Local Authority is investing in additional training for school staff in order to upskill and ensure that all settings implement appropriate support for learners. This includes support from the

and legislation concerning Autism to help prevent exclusions and/or parents choosing to home educate.		Education Psychology and Additional Learning Needs (ALN) Advisory Services for a wide range of interventions where pupils are experiencing high levels of anxiety and Emotional Based School Avoidance (EBSA), to ensure that pupils do not disengage with their school placement and are valued within an inclusive school environment.
Why has Llanwern High School been identified to host this new provision?	1	<p>Llanwern High School has been proposed to host the ASD base as all other English-medium secondary schools in Newport are full. Llanwern High School already has a specially designed appropriate space to host this new base, having previously hosted a Social Emotional Behavioural Difficulties (SEBD) provision. This will enable a secure, separate area of the school building to be provided for these pupils, with an appropriate separate entrance and opportunities for withdrawal / small group working in the classroom spaces available, as well as the development of independent life skills in the kitchen areas.</p> <p>The Local Authority's current ASD provision at The John Frost School is also a 20-place provision. The base being proposed at Llanwern High School will ensure that there is equitable provision on both the East and West of the City.</p>

Adverse comments were also received by email from a governor of Llanwern High School who requested further information around how the new base would be funded, in particular the impact on Llanwern High School if costs exceed the estimated £500k per year, and whether the school had sufficient facilities to accommodate the additional staff that would need to be employed to support the proposed provision.

In response, the Council can confirm that schools receive top-up funding to support ALN bases in addition to mainstream funding per pupil. This additional funding reflects the additional cost of providing higher levels of staffing. The proposed staff/pupil ratio for the base would be 2:10 and is based on a top of scale teacher with appropriate allowances, and two Teaching Assistants (one at Level 3 and one at Level 2). The following table shows the funding ratio however the Headteacher would be responsible for determining the appropriate staffing each year as per the relevant pupil cohort as the provision grows. The Local Authority will ensure that there is adequate staffing until the base is fully grown, to ensure there is no detrimental impact to the school's budget.

No. Pupils	No. Teachers	No. TA Level 2	No. TA Level 3	Total No. Staff
10	2	2	2	6
20	4	4	4	12

In terms of the school building, Llanwern High School has a pupil capacity of 1450, and staffing facilities proportionate to that number. As there are currently less than 1000 pupils on roll at the school there are more than sufficient facilities for the increase in staff that would be anticipated as a result of this proposal.

The response received from a School Trade Union was supportive of the proposal, but stated that there needed to be appropriate planning around the needs of learners, appropriate staffing and professional learning, and sufficient funding. The Council's response to these points has been covered already within this Consultation Report or else is referenced in the following section.

Estyn's Response

The full response from Estyn is included at Appendix C of this report. However, in summary, the response states that the proposal is likely to, at least, maintain the standard of provision in the area.

Estyn states that 'overall, the school reorganisation proposal to establish a 20-place specialist base for pupils with Autistic Spectrum Disorder at Llanwern High School with effect from September 2023 has many merits', including:

- Data provided by the local authority demonstrates a clear demand for specialist ASD provision within Newport, particularly from Year 7 upwards. Existing specialist provision within the local authority is at (or exceeds current) capacity and the proposal's growth model;
- Five new Year 7 places each year for four years, is well considered and achievable;
- Llanwern High School has capacity to host such a provision as it has been operating under its measured capacity for several years;
- It would result in equitable provision on the east and west of the city such that pupils are able to attend a school more local to their home address thus reducing transportation costs;
- The proposed new provision could be established in a specially designed space that previously hosted a Social Emotional Behavioural Difficulties (SEBD) provision, which benefits from separate entrances, is securely enclosed, has dining facilities and kitchens, dedicated toilets, outside play area, sensory room, and suitable space for transportation to drop-off and pick up immediately outside;
- Once operating at capacity there is a significant financial benefit to the establishment of this new provision and the overarching financial modelling of the proposal is sound.

However, the response goes on to state that 'The proposal does not outline a number of key areas associated with staff recruitment, training, and oversight where the proposal could be strengthened' and "the proposal does not outline in sufficient detail how the school will be supported by the local authority in operating the new ASD provision effectively".

In response, the Council would advise that outreach support from Ysgol Bryn Derw will be prioritised when the proposed provision initially opens - initially for 4 days per week, reducing to 2-3 days in the second half of the Autumn term and then moving to 1 day per week post-

Christmas 2024. This will be determined according to progress made and the skills and experience of the appointed staff. Regular input from the school will continue in subsequent years as the pupil cohort and staff team grows. The Council is also keen to progress joint staff training opportunities across the two schools to support professional learning.

Estyn also noted that the proposal does not contain enough information about the staffing structure for the provision, particularly who will be responsible for the day-to-day operation of the provision, the number of staff to be appointed, and any details regarding the specific roles these staff would fulfil.

In response to these points, the Council can confirm that the overall management of the ASD Base will be the responsibility of the Headteacher; however the provision will be overseen directly by a member of the Senior Leadership Team who will have line management responsibility for the appointed teacher.

The proposed staff/pupil ratio would be 2:10 and is based on a top of scale teacher with appropriate allowances, and two Teaching Assistants (one at Level 3 and one at Level 2).

No. Pupils	No. Teachers	No. TA Level 2	No. TA Level 3	Total No. Staff
10	2	2	2	6
20	4	4	4	12

The table above shows the funding ratio however the Headteacher would be responsible for determining the appropriate staffing each year as per the relevant pupil cohort as the provision grows. However, the LA will ensure that there is adequate staffing until the base is fully grown, to ensure there is no detrimental impact to the school's budget.

Estyn also noted that whilst the proposal refers to staff training, primarily at appointment and setup, it is unclear how staff training will be maintained and developed further over time.

To support this, the Council has drafted the following table to outline the experience, knowledge and skills that would be expected of the relevant staff prior to appointment and what could be accessed following appointment. However, an assessment would be made following each appointment and a bespoke training package would be implemented and supported by the Council and Ysgol Bryn Derw.

Role	Teacher	TA
Experience/training prior to appointment	Teaching pupils with ASD Experience of teaching the same pupils through the day in the same place (i.e. primary or base style experience NOT secondary subject style experience) Using a TEACCH approach Understanding of sensory needs associated with ASD	Working in a classroom with pupils with ASD Knowledge of TEACCH approaches

Experience/training after appointment	Team Teach PECS/Signing TIS/Thrive Attachment/ACEs Chance to observe in another specialist setting	Team Teach PECS/Signing Attachment/ACEs Sensory needs training Chance to observe in another specialist setting
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Further clarity was also sought in relation to the therapies that would be available to the learners at the proposed ASD Base.

The Council can confirm that partnership links will be developed between Llanwern High School and Ysgol Bryn Derw to share knowledge and experience and to maximise therapy opportunities - such as joint meetings with therapy providers. Llanwern High School staff would also have the opportunity to observe the delivery of in-house therapies by Ysgol Bryn Derw and model these through outreach support. There is no expectation that pupils will be transported to access therapies, rather Llanwern ASD Base will develop a range of appropriate therapies they can provide on-site with support from YBD depending on the needs of the pupils.

Related to this, Estyn noted a lack of information within the proposal about how interactions between pupils within the specialist provision and the wider school will be managed, and whether the aim of the provision is to reintegrate these pupils into mainstream education.

The Council can confirm that the ASD Base pupils will be an integral part of the school population and pupils will access the facilities available to all pupils within the school. The pupils within the ASD Base will be carefully supported and when able and appropriate, will access mainstream lessons with adult support from the ASD Base. This will be co-ordinated between the ASD Base teacher and the member of SLT overseeing the provision. The aim will be to gradually increase time for the pupils into mainstream as and when appropriate, based on individual pupils needs, strengths and interests. However, the complexities of some of the pupils' needs may mean they have limited access to mainstream lessons at first, this would be continually monitored and assessed on an individual pupil basis and increased when appropriate. Access to other areas of the school such as the canteen area will be carefully organised to avoid particularly noisy times. For example, if required the pupils of the ASD Base would be able to access the canteen early to avoid the noise and large groups.

Finally, Estyn queried the financial viability of the proposal in the short to medium term.

In response, the Council can confirm that the formula funding for learning resource bases (LRB) attached to mainstream schools seeks to deliver sufficient top up funding in addition to mainstream AWP funding, which reflects the additional cost of providing higher levels of teaching and non-teaching support.

Unit funding is allocated to schools under Section F of the schools funding formula. Funding is clearly identifiable on Table 3 of the schools Individual Budget Share under the section SEN / Social Needs Funding as SEN Unit and whilst the LRB is in place and operational

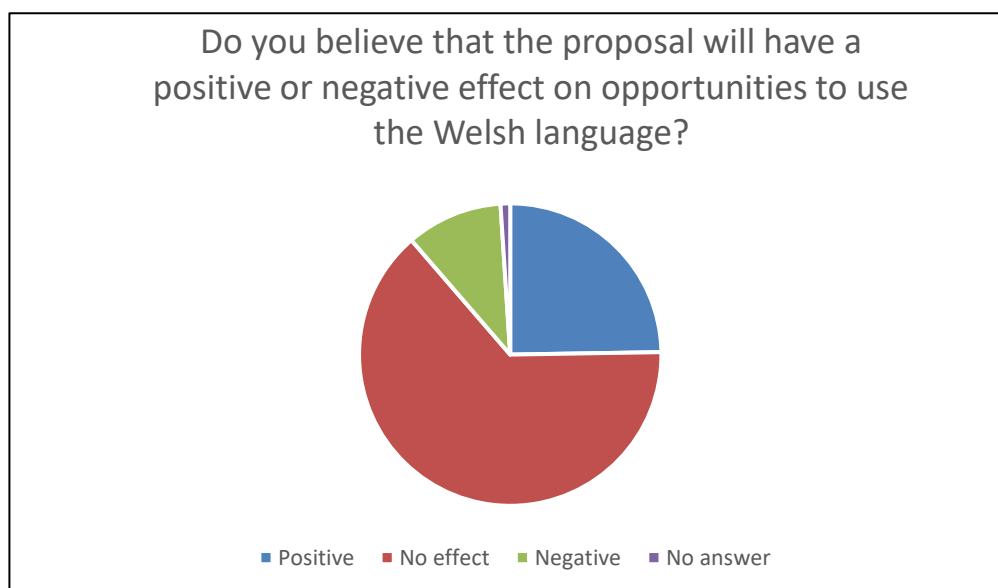
funding will be allocated annually, uplifted to account for any changes to pay costs and AWPU values for subsequent year.

As the new LRB is opening on a phased basis, the school will receive place led funding from the first anticipated day of opening of the new LRB. The place led element of funding will be proportionate to the number of months the unit is likely to be open out of a full financial year and the number of places available. Schools will also receive AWPU funding in respect of actual unit pupils on roll, in proportion to the number of months that the pupil is likely to be at the unit out of a full financial year.

Perceived impact of the proposal on the Welsh language

The consultation response pro-forma also asked respondents to give their views on the likely impact of the proposal on the Welsh language.

'Do you believe that the proposal will have a positive or negative effect on opportunities to use the Welsh language?'



96 out of 97 respondents answered this question. 24 out of 97 respondents (25%) answered 'Positive'. 62 respondents (64%) answered 'No effect', and 10 respondents (10%) answered 'Negative', although from the comments provided it appears that the question was possibly misunderstood. One respondent suggested that the proposed provision should be established at Ysgol Gyfun Gwent Is Coed in order to support pupils in Welsh-medium education. The Council's Welsh in Education Strategic Plan (WESP) sets out a commitment to open a Welsh-medium Primary Learning Resource Base and the development of a primary LRB will impact on secondary provision, therefore consideration will need to be given regarding specialist ALN provision within Ysgol Gyfun Gwent Is Coed for pupils transitioning from the primary sector Learning Resource Base. The development of a secondary LRB will be reviewed on an annual basis in light of data trend analysis following the opening of the

primary LRB. This will ensure that the ALN needs of pupils transitioning to the secondary school can be met in a timely manner.

In response to the question 'Do you believe that the proposal will treat the Welsh language less favourably than the English language?' 16 respondents answered 'Yes'. However as with the previous question most respondents appear to have misunderstood the question.

Assessment of the Proposal

Following the public consultation period, the Council maintains the view that the proposal (option 1) represents the best and most achievable solution to provide additional Secondary specialist ASD places in Newport.

During the consultation period it became clear that there was a perception amongst some staff and parents of pupils attending the school SLC provision at Llanwern High School that the proposal would see the current provision closed, and that the pupils currently supported through this provision would be integrated into large mainstream classes. Although this is not the case, the consultation documentation could and should have made this clearer, as this misconception caused anxiety amongst stakeholders and adversely affected the drop-in sessions.

Stakeholders with links to the existing school SLC were also frustrated that the Local Authority was consulting on this proposal without including a solution for the relocation of the SLC within the proposal.

Council officers are confident that the existing SLC provision can be appropriately and safely relocated to another part of the school building. Although this relocation may result in anxiety and stress for some pupils in the short term, it is considered that the benefits of the proposal outweigh the potential dis-benefits.

A school governor and Estyn both noted that the proposal failed to provide certain details that would enable a clear assessment of the proposal. This criticism is accepted, and therefore further information in response to the questions raised have been provided in this report.

Following due consideration, the proposal, option 1, is still preferred over the alternative options 2, 3 and 4 available:

Option 1 - Proceed with the proposal for the phased implementation of an ASD base at Llanwern High School over 5 years. This provides security of transition from primary to secondary school in the East of the city for 4 learners each year. The ASD base would provide suitable education for pupils, meeting the pupils complex needs whilst offering an expansion of ASD provision across the city. The provision would need to be funded from the individual school's budget by way of a prescribed formula. The formula seeks to deliver sufficient top up funding in addition to mainstream AWPU funding, which reflects the additional cost of providing higher levels of teaching and non-teaching support in the ASD

base. The ASD base will reduce the need for Out of County placements which have an approximate annual cost of £42,000 per placement (excluding transport).

The proposal is still preferred over the alternative options available:

Option 2 – Proceed with proposal for the ASD base at Llanwern High School, but establish the 20 place provision with immediate effect. This will create additional places for older pupils in years 8-11 and may enable pupils to transfer in from other schools or out of county placements. However this could compromise the security of transition from Year 6 to Year 7 provided under option 1. The ASD base would provide suitable education for pupils, meeting the pupils complex needs whilst offering an expansion of ASD provision across the city. The provision would need to be funded from the individual school's budget by way of a prescribed formula. The ASD base will reduce the need for Out of County placements which have an approximate cost of £42,000 per placement (excluding transport).

Option 3 – Bring forward a proposal to establish an ALN base for pupils with ASD at a different secondary school. The intention is to establish a new offer in the East of the city to mirror that provided at The John Frost School in the West of the city. As such Llanwern High School has been identified as the location best suited for this, due to all other English-medium secondary schools in Newport being full. Llanwern High School already has a specially designed appropriate space to host this new base, having previously hosted a Social Emotional Behavioural Difficulties (SEBD) provision. This will enable a secure, separate area of the school building to be provided for these pupils, with an appropriate separate entrance and opportunities for withdrawal / small group working in the classroom spaces available, as well as the development of independent life skills in the kitchen areas.

Option 4 – Each pupil is moved to Out of County provision. The average cost of each Out of County place is £42,000 but there is a lack of specialist school capacity across the region. This would require independent placements to be sought and these placements would be in excess of the £42,000 average cost per annum. The costs exclude transport.

Recommendations

It is recommended that permission be sought to move this proposal forward by publishing a statutory notice. This decision will be referred to the Cabinet Member for Education and Early Years and taken through the Council's agreed democratic process.

In accordance with the School Organisation Code (2018) this report is published electronically on Newport City Council's website at www.newport.gov.uk/schoolreorganisation

To request a hard (paper) copy of this document please contact Newport City Council's Education Information and Development Officer on 01633 656656 or email school.reorg@newport.gov.uk

Appendix A – Frequently Asked Questions published on Newport City Council Website

- What will happen to the current SLC provision at Llanwern High School?

The proposal is to establish a new specialist ASD base in addition to the SLC facility currently provided by the school. The proposed area within Llanwern High School for the ASD Base would mean the re-location of the SLC to an alternative area of the school. The Local Authority and School are currently exploring options for the location of this provision to ensure the school is able to continue to meet learners' needs.

- Why the focus on ASD and not other Additional Learning Needs (ALN)?

Analysis of Local Authority data over the past 5 years has demonstrated an increasingly complex ASD population which is also reflected in local officer experience. As such, the Local Authority are committed to ensuring that the ASD provision within the city reflects increasing demand in order to appropriately meet the needs of the majority of pupils within the City, without the requirement for Out of County placements. The Local Authority continually review the data trend analysis to inform future decisions with regards ALN provision within Newport.

- Why Llanwern High School? And why only 4 places each year?

Llanwern High School has been proposed to host the ASD base as all other English-medium secondary schools in Newport are full. The capacity of the ASD base proposed is capped at 20 due to the availability of space at the school. The proposal is to open the base initially with 4 year 7 placements which will incrementally increase over a 5 year period until all 20 placements are established. This will provide security of transition from primary to secondary school in the East of the city for 4 learners each year. The Local Authority's current ASD provision at The John Frost High School is also a 20 placements provision (although currently there are 25 pupils placed). If the Local Authority's proposal is implemented, there will be a 20 placement ASD Base both at The John Frost High School and Llanwern High Schools respectively. This will ensure that there is equitable provision on both the East and West side of the City. Each placement will offer 4 placement per year (8 across the City per annum in total).

- Why are the Local Authority targeting complex low ability ASD learners as opposed to high functioning ASD learners?

The Local Authority regularly review their ALN provision to ensure that all learners are catered for. The Local Authority recognise that there is a discrepancy currently between Primary and Secondary ALN provision and the proposed ASD Base at Llanwern High School is an acknowledgement of that and a step towards ensuring there are wider secondary provision available. The Local Authority's Special Schools (Maes Ebbw and Ysgol Bryn Derw) are now catering for more highly complex pupils, including those with profound multiple learning difficulties. As such, the thresholds of provisions such as The John Frost School ASD Base, St Julian's School Learning Development Centre (LDC) and the proposed Llanwern High School ASD Base will admit a more acute and complex profile of pupils than in previous years. The Local Authority's data trend analysis has identified that there is a current

gap in provision within Newport for learners with complex ASD who are also experiencing learning difficulties.

In order to provide support for ASD learners who are high functioning, the Local Authority are investing in additional training for school staff in order to upskill and ensure all settings implement appropriate support for learners. This includes, for example, support from the Education Psychology and the Additional Learning Needs (ALN) Advisory Service to schools for a wide range of interventions. This includes (but is not limited to) where pupils are experiencing high levels of anxiety and Emotional Based School Avoidance (EBSA), to ensure that pupils do not dis-engage with their school placement and are valued within an inclusive school environment.

Appendix B - Consultation Response Pro-forma

To establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023

Your views matter. Please tell us what you think about the proposal by completing this questionnaire. **The closing date for the submission of responses to this consultation is midnight on 6 January 2023.** Please note that negative responses made to this consultation will not be counted as objections to the proposal, they will be recorded as adverse comments. Objections can only be registered following the publication of a statutory notice.

1) Do you support the proposal to:

To establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023

Yes No In part

Please use the box below to provide comments or explain which element of the proposal you do/do not support.

2) Do you believe that the proposal will have a positive or negative effect on opportunities to use the Welsh language?

Positive Negative No effect

3) If you think it will have a negative effect, what steps could we take to lessen or remove this and improve positive effects?

4) Do you believe that the proposal will treat the Welsh language less favourably than the English language?

Yes No

Please indicate who you are (e.g. parent/carer of a child attending a local nursery)

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Please select your Ethnic group			
White British		Asian-Bangladeshi	
White Irish		Asian-Indian	
Any other White background (please state): _____		Asian-Pakistani	
		Any other Asian background	
Gypsy or Irish Traveller		Black Caribbean	
White and Asian		Black African	
White and Black African		Any other Black background	
White and Black Caribbean		Arab	
Any other Mixed background (please state): _____		Chinese	
		Any other ethnic group (please state): _____	
Asian-Bangladeshi		Prefer not to say	
Asian-Indian			
Asian-Pakistani			

Welsh language			
Do you consider yourself a Welsh speaker?			
Yes		No	Prefer not to say

Caring Responsibilities			
Do you care for children of school age?			
Yes		No	Prefer not to say
Do you care for children of pre-school age?			
Yes		No	Prefer not to say
Do you care for a dependent adult or child above school age?			
Yes		No	Prefer not to say

If you wish to be notified of the publication of the consultation report, please supply your contact details:

E-mail: _____

Postal address: _____

Appendix C - Estyn's response

Estyn response to the proposal to establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023

This response has been prepared by His Majesty's Inspectors of Education and Training in Wales.

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

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

Introduction

This consultation proposal is from Newport City Council. The proposal is to establish a 20 place Additional Learning Needs (ALN) base at Llanwern High School for pupils with Autistic Spectrum Disorder (ASD) from September 2023

Summary/Conclusion

We consider that the proposal is likely to, at least, maintain the standard of provision in the area.

Descriptions and benefits

Overall, the school reorganisation proposal "to establish a 20-place specialist base for pupils with Autistic Spectrum Disorder at Llanwern High School with effect from September 2023" has many merits. However, the proposal does not outline a number of key areas associated with staff recruitment, training, and oversight where the proposal could be strengthened.

Data provided by the local authority demonstrates a clear demand for specialist ASD provision within Newport, particularly from Year 7 upwards. Existing specialist provision within the local authority is at (or exceeds current) capacity and the proposal's growth model, five new Year 7 places each year for four years, is well considered and achievable.

The location of the proposed new provision at Llanwern High School has a number of advantages. Firstly, it would result in equitable provision on the east and west of the city such that pupils are able to attend a school more local to their home address thus reducing transportation costs. Secondly, the proposed new provision could be established in a specially designed space that previously hosted a Social Emotional Behavioural Difficulties (SEBD) provision. This building is graded A (in good condition), benefits from separate entrances, is securely enclosed, and would only require minor adjustments for it to be suitable. It has a suitable number of classrooms (4), dining facilities and kitchens, dedicated toilets, outside play area, sensory room, and suitable space for transportation to drop-off and pick up immediately outside. Finally, Llanwern High School has capacity to host such a provision as it has been operating under its measured capacity for several years.

Once operating at capacity there is a significant financial benefit to the establishment of this

new provision and the overarching financial modelling of the proposal is sound.

The proposal does not outline in sufficient detail how the school will be supported by the local authority in operating the new ASD provision effectively. Whilst Llanwern High School has previously hosted a specialist behavioural provision, this would be the first time the school has hosted a specific ASD provision and as such a level of support will be required. It states that the school will receive “additional specialist support and training from the team at Ysgol Bryn Derw”, however this statement does not quantify the level of training and support the school will receive sufficiently.

The proposal does not contain enough information about the staffing structure for the provision, particularly who will be responsible for the day-to-day operation of the provision. Whilst the proposal does identify the need to recruit “appropriately qualified staff” and it will be “supported by the Local Authority’s Central Education and Human Resources services” in doing this, these arrangements are not clear. The proposal does not identify either the number of staff to be appointed, nor any details regarding the specific roles these staff would fulfil. There is no information about the likely staff ratio for the provision, either in terms of teachers to teaching assistants, nor pupils to adults.

The proposal refers to staff training, primarily at appointment or setup, but it is unclear how staff training will be maintained and developed further over time.

The proposal indicates that several therapies will be “developed and timetabled at Ysgol Bryn Derw”. It is not indicated whether this is a short-term arrangement until the new provision is well established, what these therapies are, and whether this is a partnership or a hierarchical arrangement? The proposal leaves the question as to why the new proposed provision will not be able to deliver these therapies if they are essential to meeting each pupil’s needs? This aspect of the proposal introduces logistical challenges as these sites are 5 miles apart and on opposite sides of the city. As such travelling between them has a significant time implication in addition to the need for dedicated transportation, staffing and associated risk assessments. There is no information in the proposal about how these challenges will be addressed and overcome.

There is no information within the proposal about how interactions between pupils within the specialist provision and the wider school will be managed, or, if such beneficial opportunities will be offered to these pupils. Furthermore, there is no information about whether the aim of the provision is to reintegrate these pupils into mainstream education.

It is not sufficiently clear from the proposal that the proposed new provision is financially viable in the short to medium term. The proposal identifies the annual cost to be in the region of £500,000 (or £25,000 per pupil), however it states that the proposed new provision is to be “funded through the school’s individual school budget share, distributed by the council according to the prescribed funding formula”. This does not make clear the budget that will be allocated to the school, nor that this will be ringfenced to ensure the provision maintains an adequate level of quality.

The proposer indicates that the proposal will not have a negative impact on the opportunities to use the Welsh language. It references the plans to develop a Welsh medium primary phase ALN provision at Ysgol Nant Gwenlli and that consideration will be given to opening a new secondary Welsh medium provision at Gwent Is-y-Coed. This would be reviewed on an annual basis in light of the data trend analysis from the primary sector.