

## Proposal to establish a new specialist provision called 'Copa' for pupils with Additional Learning Needs (ALN)

**Statutory Consultation Document** 



This document is available in Welsh

This document is available in languages other than Welsh or English upon request. It is also available in accessible formats such as large print, Braille, BSL DVD and audio-CD upon request. To make a request for this document in another format or language, please email <u>copaconsultation@wrexham.gov.uk</u> or write to the Access and School Places Team, Education and Early Intervention Department, Crown Buildings, 31 Chester Street, Wrexham, LL13 8BG.

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## Foreword from Chief Officer Education & Early Intervention

Wrexham County Borough Council has a statutory responsibility to promote high quality, effective education provision. Part of this responsibility is to keep the number and type of school places under review to ensure there are suitable and sufficient school places available in order to enhance opportunities for learning and deliver education efficiently.

We put learners at the heart of all we do, and we invite ideas from the community as we develop specific proposals. By listening to the views of those affected by any changes, we can make better decisions, and can work together to deliver the change needed to ensure that children and young people in Wrexham achieve the best they can.

Our vision:

We want all learners to be and become the best that they can, to have high aspirations, the confidence, opportunities and qualifications to achieve their potential.

In practical terms, Wrexham County Borough Council needs to establish provision that reflects changing patterns of need and demand for mainstream and special education.

This ambitious programme for new and better schools gives regard to legislative changes in education, including the implementation of the new Curriculum for Wales and the Additional Learning Needs and Educational Tribunal Act.

Our programme includes new and better facilities in a state-of-the-art building for learners with additional learning needs (ALN). This proposal for a new specialist in-county provision is being developed to better meet the learning and well-being needs of learners with ALN in Wrexham.

Consultation will follow guidelines established by the Welsh Government and will involve key stakeholders as set out in the School Organisation Code 2018. The information contained in this document is intended to clarify proposals for the new provision and support the consultation process.

#### **Karen Evans**

#### Chief Officer, Education & Early Intervention

## The Proposal

## Introduction

Wrexham County Borough Council are holding a formal consultation on the following proposal:

# To establish a new specialist provision called 'Copa' for pupils with additional learning needs (ALN).

Following consultation on these proposed changes, the Council will consider whether the proposal should be implemented.

This is your opportunity to ask questions and make comments that will be considered by the Council's Executive Board, who will decide how to proceed.

The formal consultation period will begin on 24<sup>th</sup> March 2025 and will end on 11<sup>th</sup> May 2025.

## **Background and Rationale for Change**

The Council has a strong track record for meeting a wide range of additional learning needs (ALN) with a continuum of specialist provision. The majority of children and young people with ALN are educated in mainstream schools. The authority continues to work with mainstream schools to be increasingly inclusive and responsive to a widening range of needs.

Over recent years, the demand for specialist school places for pupils with additional learning needs (ALN) has risen in Wrexham. A significant number of children who present as neuro-diverse, with autism as their primary area for support require a more specialist setting for their learning and well-being needs to be met.

By bringing this proposal forward, the Council intends to address the rising demand for special school places. This project will enable up to 18 pupils in key stages 3 and 4 who present as neuro-diverse, with autism as their primary area for support to have their learning and well-being needs met within the County Borough. These pupils will often present as having problems with mental health and may manifest self-harming behaviours and/or behaviours which challenge when their environmental and sensory needs are not met. The new specialist provision would be specifically designed as an autism-friendly, inclusive learning environment ensuring a range of sensory needs are met.

## What would this proposal mean?

This proposal means that in the future, pupils in key stages 3 and 4 who present as neurodiverse with autism as their primary area for support, will be educated closer to home and have their learning and well-being needs met within the County Borough. More pupils will be able to remain within the authority for their education without the need to travel distances and access their education out-of-county. The proposed site would be The Opportunities Centre, Hampden Way, Plas Madoc, Wrexham LL14 3US.

## Timetable of Key Dates

Please note that consultation timescales may be subject to change. In this event, any changes would be publicised.

Event	Dates
The Consultation Period	24 <sup>th</sup> March 2025 to
During this time you can make your views known by:	11 <sup>th</sup> May 2025
<ul> <li>Attending the drop in sessions (notes will be taken)</li> </ul>	
Completing the online survey	
Writing to or emailing the Council	
Completing the response form at the end of this booklet	
Consultation Report Presented to Executive Board	8 <sup>th</sup> July 2025
Statutory Notice Published and Formal Objection Period	16 <sup>th</sup> July 2025
Begins	
Formal Objection Period End	20 <sup>th</sup> September 2025
Executive Board Determines Final Decision on the Proposal	November 2025
Decision Notification Presented to Consultees	November 2025
Implementation of the Proposal	1 <sup>st</sup> April 2026

## Impact of the Proposal-Benefits and Disadvantages

## What are the potential benefits?

The new specialist provision will have the following benefits:

- Increased access to specialist education for pupils in the Wrexham area with complex neuro-diverse and autism as their primary area of need.
- Sustainable and improved learning facilities to meet the needs of learners with neurodiverse and autism as their primary area of need.
- Specialist provision and specialist resources with improved access to facilities such as sensory rooms and low arousal learning environments which support the needs of young people accessing the building.
- Improved indoor learning environments for Wrexham pupils with complex neurodiverse and autism as their primary area of need.
- Better long term life chances for pupils with complex neuro-diverse and autism as their primary area of need.
- Fewer number of placements and transitioning, meaning pupils will be able to stay in the setting for longer with consistent support workers and consistent journeys / transport arrangements.
- Flexibility to adapt to changing needs and increased demand.
- Improved opportunities for multi-agency working, including access to health professionals for pupils with complex neuro-diverse and autism as their primary area of need.
- Resources targeted more efficiently.
- Compliments Wrexham's Additional Learning Needs Team vision to provide sufficient and flexible statutory provision for pupils with additional learning needs.

## What are the potential disadvantages?

The new specialist provision could mean that:

- Pupils would not have access to the mainstream learning environment, hence they would not have access to specific science areas.
- Some pupils with ALN can find change difficult. They may find moving to a new building on a new site unsettling.
- There is potential for increased traffic congestion around the school sites at the start and end of the day.

## Mitigations

- Links with secondary school(s) will be explored to ensure learners are accessing a range of services and are provided with the appropriate supported to access, thus ensuring a bespoke and individualised approach to learning.
- The transition will be carefully planned with appropriate support mechanisms in place to help pupils adapt to the new setting.
- There will be sufficient time to plan and support pupils with the transition from one educational provision to another, including a phased start to provide time for learners to adjust.
- The Council is working on a transport survey with input from key experts and affected stakeholders to alleviate any potential traffic congestion or parking issues.
- Pupils who present as neuro-diverse, with autism as their primary area for support will be able to access specialist provision in-county that meets their needs, without having to travel distances to access their education out-of-county.
- Pupils who present as neuro-diverse, with autism as their primary area for support will continue to be supported with regard to transport arrangements and costs.

## Summary of the Benefits and Disadvantages

In light of the above benefits and disadvantages, it is the view of the Council that the longer term benefits of the proposal outlined above outweigh any disadvantages. Any potential risks will be carefully managed and mitigated wherever possible.

## **Resourcing of Education/Financial Implications**

By educating pupils within county, the number of out-of-county placements and associated significant costs to the authority will be reduced. The proposal would also bring whole system benefits and mean that children who need specialist support will be able to access it in a more timely manner. Funding from Welsh Government's Additional Learning Needs grant will be used to fund this project, which will include refurbishment of the building in order to optimise learning environments and promote inclusivity for pupils with additional learning needs (for example, should the final proposal include additional capacity for ALN learners). The savings from reducing out of county placements will bring whole system benefits, meaning that learners who present as complex neuro-diverse with autism as their primary area for support will be able to access it in a more timely manner. In addition, the savings will outweigh any additional revenue costs. A business case to support the assumptions set out above will have to be approved in due course.

## **Governing Body Implications**

This will be a new specialist provision, therefore there is currently no existing governing body. Any future proposed changes to policies and arrangements in respect of admissions, employment and the curriculum will be dealt with by the new governing body and local authority accordingly.

## **Staffing Implications**

This will be a new specialist provision, therefore there is currently no existing staffing structure in place. The new school will need to consider how to recruit staff and establish appropriate staffing structures. The staffing structure will take into account the needs of the young people. This will inform staffing ratio, multi-disciplinary working such as speech and language, occupational health and school nursing. A comprehensive induction programme for staff will ensure they have the necessary skills, knowledge and experience to support young people accessing the provision. This will be supported by continuous professional development opportunities which would enable all staff to meet the needs of the young people accessing the provision. There will be a phased start for pupils starting at Copa ensuring all learners receive a positive transition and enabling staff to gradually familiarise themselves with pupil need.

## **Transport Implications**

Transportation for the pupils who attend this provision will be in accordance with the Council's policy for home-to-school transport. In line with the Council's school transport policy, free transport is provided to all pupils with additional learning needs who require transport. This proposal will not impact on this arrangement.

There is potential for increased traffic congestion around the school sites at the start and end of the day. The Council is working on a transport survey with input from key experts and affected stakeholders to understand the requirements and alleviate any potential traffic congestion or parking issues. The project would move forward with careful consideration of transport and parking requirements.

## Sustainability

As part of the Council's ongoing commitment to become carbon neutral by 2030, school projects involving refurbishment or new builds will include low carbon, energy efficient and innovative features in order to meet Welsh Governments requirements for Net Zero in operation.

## Supporting the Community

The future sustainability of our learning communities is supported well if we make the best use of existing educational facilities and if we create new facilities where they are needed most. We aim to provide a warm safe space for community groups and organised activities within our schools and to reduce the impact of socio-economic disadvantage in our communities. We work closely with the team working on Community Focussed Schools to ensure a joined up approach, providing inclusive spaces which aim to tackle poverty and improve wellbeing for families and learners within our communities. The community provision, run by the Association of Voluntary Organisations (AVOW) will continue.

## Impact on other schools

Rhosymedre County Primary School, Wrexham is located next to the building. Discussions have taken place with the school to explain the proposal and any potential impact.

There is a childcare (Little Sunflowers) setting located next to the building. This is separate to the part of the building proposed for the new ALN provision. Discussions have taken place with the setting to explain the proposal and any potential impact.

Other schools with specialist provision that could potentially be impacted are listed below. It is anticipated that there will be minimal impact on these provisions.

- Educate Independent Special School
- Abbey School Independent Special School

• Bryn Tirion Hall School, Independent Special School

## **Quality and Standards in Education**

The Council works closely with school Governing Bodies to ensure that standards are high, that teaching is good and that leadership and governance is strong. The Council works in partnership with Estyn in order to monitor the performance of schools and to support school improvement for the children and young people of Wrexham.

Estyn is the office of His Majesty's Chief Inspector of Education and Training in Wales. It is a crown body and was established under the Education Act 1992. Estyn is independent of the Welsh Parliament but receives its funding from the Welsh Government under Section 104 of the Government of Wales Act 1998. Estyn inspects the quality and standards of provision in schools and training providers in Wales.

Local Authorities must demonstrate the likely impact of the proposals on the quality of:

- Standards/Learning
- Wellbeing and Attitudes to Learning
- Teaching and Learning Experiences
- Care, Support and Guidance
- Leadership and Management

Schools are inspected as part of a national programme. The purpose of an inspection is to identify good features and shortcomings in a school so that they may improve the quality of education offered and raise the standards achieved by their pupils. Following inspection, Estyn issues a report and provides schools with recommendations for improvement. As this proposal relates to a new provision, there is no Estyn report to refer to as yet.

## Impact of the Proposal on the Quality and Standard of Education

This proposal seeks to build upon current standards with a view to strengthening and improving educational provision for the children, leading to greater pupil engagement and enjoyment in learning and a positive impact on pupil well-being. The new provision will ensure that there are positive teaching and learning experiences and a nurturing environment of care, support and guidance which is tailored to meet the needs of pupils with complex neuro-diverse and autism as their primary area for support.

## **Risks/Dependencies of the Proposal**

This proposal is subject to the consultation process and subsequent statutory notice period. If after considering the consultation responses, the Council's Executive Board decides to proceed with this proposal, the Council will publish a Statutory Notice, which will invite anyone who wishes to object to do so in writing within a period of 28 days.

If objections are received, an objection report will be published on the Wrexham County Borough Council website. Hard copies of the report will also be available on request. The report will summarise the issues raised and provide the Council's response to those objections.

All possible risks will be monitored as part of Wrexham County Council's School Risk Management Strategy. By monitoring and ensuring there is a robust approach to any risks and disadvantages, the impact on pupils, parents, carers, teachers and support staff can be minimised.

## Alternative Options Considered

In developing a preferred option, the Council has considered a range of alternative options.

## **Option 1-Status Quo**

Maintain the current status quo where pupils with complex neuro-diverse and autism as their primary area for support are transported out-of-county to access their education.

Discounted due to:

- A rising demand for this type of support placing significant pressure on the authority to meet the needs of pupils with ALN.
- The need to provide support within the county borough of Wrexham to alleviate pressures and reduce costly out-of-county placements which is a significant financial pressure on the Education Department and the authority as a whole.

## Option 2-Increase provision within mainstream settings

Discounted due to:

- Impact on mainstream learners due to the significant and complex needs of pupils with complex neuro-diverse and autism.
- Pupils with specific needs require additional learning provision.
- A total communication approach is provided for pupils, including daily sensory input and intensive adult interactions, which are provided within a specialist setting.
- Increased family support work in a specialist setting helps to support vulnerable families.

# Option 3-Create a new ALN provision for pupils with complex neuro-diverse needs and autism as their primary area for support

Preferred option for reasons outlined herein.

## **Impact Assessments**

The following initial impact assessments have been conducted as part of this proposal and the summaries below have been realised. Impact assessments are working documents and may be updated throughout the statutory process. Feedback from consultees during the consultation period will be used to inform the impact assessments.

## Integrated Impact Assessment

An initial integrated impact assessment has been carried in relation to potential impacts on a number of aspects including Equality and the Wellbeing of Future Generations. The integrated impact assessment report presents information and assurance about how, when taking decisions, we have considered our duties and commitments in relation to legislation, priorities and strategies regarding the proposal. No significant adverse effects have been identified in the initial assessment.

## Welsh Language Impact Assessment

An initial Welsh Language Impact Assessment has been carried in relation to potential impacts on the Welsh language and Welsh medium education. This proposal links to the following WESP objectives:

Objective 6:

An increase in the provision of Welsh-medium education for pupils with additional learning needs (ALN) (in accordance with the duties imposed by the Additional Learning Needs and Education Tribunal (Wales) Act 2018.

## Objective 7:

*Increase the number of teaching staff able to teach Welsh (as a subject) and teach through the medium of Welsh.* 

The Welsh Language Impact Assessment seeks to explore the extent to which the proposal supports the WESP targets and how the proposal could expand or reduce Welsh medium provision. An initial assessment has found that the proposal is likely to have a positive effect on the existing commitment to and use of the Welsh language but recognises there is more work to be done to address shortfalls in Welsh medium provision for ALN learners and to upskill staff competency to mitigate any negative impact.

Ongoing work in relation to our WESP objectives will minimise and mitigate any potential impacts from the proposal as we continue to promote and raise the profile of Welsh medium education in line with the aspirations of the Council's Welsh in Education Strategic Plan (WESP) and Cymraeg 2050.

#### **Community Impact Assessment**

The initial community impact assessment has indicated that there will be a positive effect on the community in that the new provision will be able to provide a more focused, supportive and effective learning environment for pupils with complex and significant additional learning needs. The community provision run by the Association of Voluntary Organisations (AVOW) on the site will continue to be in place.

#### **Transport Impact Assessment**

Outcomes of the initial Transport Impact Assessment indicate that the proposal is feasible and no significant adverse effects have been identified in the initial assessment. It is recognised however that there is potential for increased traffic congestion around the school sites at the start and end of the day. The Council is therefore working on a comprehensive transport survey with input from key experts and affected stakeholders to understand the requirements and alleviate any potential traffic congestion or parking issues. The project would move forward with careful consideration of transport and parking requirements.

Free transport is provided to all pupils with additional learning needs who require transport. This proposal will not impact on this arrangement. Transportation will remain in accordance with the Council's policy for home-to-school transport.

The proposal will mean that pupils' journeys will be reduced due to receiving their education within Wrexham County Borough rather than having to travel distances to access their education out-of-county. The benefits of this may mean pupils will have fewer placements and transitioning, meaning pupils will be able to stay in the setting for longer with consistent support workers and consistent journeys/transport arrangements.

## **The Consultation Process**

This consultation document sets out information which consultees will need to consider in order to take part fully in the consultation process. The process follows regulatory guidance as set out in the Welsh Government's School Organisation Code 2018.

## Who will be consulted?

A range of individuals were asked for their views about the proposal including:

- Elected Members of Wrexham County Borough Council
- The Church in Wales and Catholic Dioceses
- Other Local Authorities: Flintshire County Council, Shropshire County Council, Denbighshire County Council, Powys County Council, Cheshire West and Chester Council
- The Governing Body at Rhosymedre County Primary School.
- All Wrexham Primary and Secondary School Governing Bodies
- All Wrexham Primary and Secondary Schools, including Welsh medium schools, English medium schools, Faith schools and Special schools.
- Parents/Carers and prospective parents/carers of the new provision and Rhosymedre County Primary School
- Staff members at Rhosymedre County Primary School
- Cefn Community Council
- The Welsh in Education Forum, including Menter laith Fflint a Wrecsam, RhAG and Mudiad Meithrin
- Welsh Ministers and Senedd Members: Lesley Griffiths MS, Ken Skates MS, Llyr Gruffydd MS, Mark Isherwood MS, Carolyn Thomas MS, Sam Rowlands MS
- Local Members of Parliament: Andrew Ranger MP, Gill German MP, Becky Gittins MP
- Estyn
- Trade unions representing teachers and staff
- Wrexham Council's School Transport Department
- The Police and Crime Commissioner
- Local Communities First Partnerships
- Local Independent Nursery Providers, Playgroups, Childminders and Flying Start Providers
- The Children and Young People's Partnership
- The Early Years Development and Childcare Partnership
- Little Sunflowers Childcare
- The Association of Voluntary Organisations (AVOW)
- SNAP Cymru
- Senedd yr Ifanc
- Educational Psychology Service
- Health, including Speech & Language Service, Occupational Therapy Service, Physiotherapy Service, Pre-school Development Service, paediatrics
- North East Wales Sensory Support Service
- Early Entitlement / Flying Start Service
- Out of county schools

The above list is not exhaustive and the consultation is open to all who wish to take part.

## The Consultation Period

The formal consultation period will begin on **Monday 24<sup>th</sup> March 2025** and will end on **Sunday 11<sup>th</sup> May 2025**.

## Considering your views

There are several ways in which you can communicate your views with us including:

• Returning the response pro-forma which can be requested from the address below.

• Emailing your views to <a href="mailto:copaconsultation@wrexham.gov.uk">copaconsultation@wrexham.gov.uk</a>

Alternatively, you can submit your views in writing to: Copa Special School Consultation, Education, Crown Buildings, 31, Chester Street, Wrexham, LL13 8BG.

Due to the volume of responses we receive when consulting on options, we will not be able to acknowledge written responses nor enter into correspondence with interested parties either during or after the consultation period.

Responses will be analysed and key themes with examples of comments made will be made available to Elected Members for decision making purposes and they will also be responded to via publication of a post consultation report.

We kindly advise that any comments will not be treated as objections at this stage.

## **Consultation Meetings**

You may also call to see us at the drop in sessions that will take place within the community during the consultation period. At these sessions you will be able to talk to officers from the Council who will be available to answer your questions.

Please note that consultation timescales and drop-in sessions may be subject to change. In this event, any changes would be publicised.

Nature of Session	Date	Time	Venue
Drop-In Session	Tuesday 1st April 2025	9.30am-11.00am	Plas Madoc Leisure Centre
Drop-In Session	Wednesday 2 <sup>nd</sup> April 2025	9.30am-11am	Kettle Club
Drop-In Session	Thursday 3 <sup>rd</sup> April 2025	10.30am-12pm	Kettle Club
Drop-In Session	Thursday 3 <sup>rd</sup> April 2025	1pm-3pm	Plas Madoc Leisure Centre
Virtual Session*	Thursday 1 <sup>st</sup> May 2025	5.00pm-5.30pm	Online link to be shared via email
Virtual Session*	Friday 2 <sup>nd</sup> May 2025	9.00am-9.30am	Online link to be shared via email

#### Timetable of Drop-In Sessions

\*To request access to the virtual session please email: <u>copaconsultation@wrexham.gov.uk</u>

Please register your interest for the virtual consultation session by no later than **Monday 28**<sup>th</sup> **April 2025**. This will give us sufficient time to send you a virtual link and instructions ahead of the session.

## **Consultation with Pupils**

Wrexham Council is committed to providing opportunities for children to be able to inform decisions made that affect their lives and the services they access. A supplementary version of this consultation document has been made available to all pupils to enable them to give their views.

The Council will seek pupils' views in a number of ways, including via an online survey. The children and young people version has been written specifically to enable all children to better understand and engage with the formal consultation process. The information gathered will be included in the post-consultation document.

## **Consultation Report**

Within 13 weeks of the end of the consultation period (and in any event prior to publication of the proposals), the Council will publish a consultation report which will:

- Summarise the issues raised by consultees.
- Respond to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.
- Detail the overall merits of the proposal as highlighted by Estyn in their response.

The consultation report may also make recommendations to the Executive Board or the Governing Body about how to proceed (i.e. to publish the proposals as consulted on with any appropriate modifications, to abandon the proposals and retain the status quo or to make significant changes to the proposal and re-consult).

The Council will ensure that any views expressed by children and young people affected by the proposal are highlighted in the consultation report and that it is made accessible to them.

The consultation report will be published electronically on Wrexham County Borough Council's website and will undergo all accessibility checks in order to ensure that it is accessible to all consultees. Hard copies of the report will be made available on request.

#### Publication of Statutory Notices

This is subject to the approval of the Post Consultation Report due to be presented to the Executive Board on 8 July 2025. **Please note that this date may be subject to change.** 

If the recommendation is accepted then a statutory notice will be issued and a 28 day objection period will begin on 29 April 2025. **Please note that this date may be subject to change.** The statutory notice will be displayed at the entrance of the setting.

## **Statutory Objection Period**

Statutory Notice Published and Formal Objection Period Begins	16 July 2025
Formal Objection Period Ends	20 September 2025

#### Please note that these dates may be subject to change.

If any objections are raised during the statutory objection period, a report will be published and this will be available on the Council's website.

A statutory notice is the formal publication of a finalised proposal. This will only be undertaken if a decision is made by the Council's Executive Board to proceed with a proposal, following consideration of all responses from the consultation process. This is a legal requirement as outlined in the School Organisation Code (2018).

We kindly ask that consultees only write in during the objection period if they have an official objection to the statutory notice. Any positive comments received during this period will have to be treated as objections even if they are in favour of the proposal.

Consultees can submit their objections to the statutory notice by emailing <u>copaconsultation@wrexham.gov.uk</u> or by writing to: Copa Special School Consultation, Education, Crown Buildings, 31, Chester Street, Wrexham, LL13 8BG.

#### **Determination of Proposal**

The results of the Statutory Notice will be taken before the Executive Board in November 2025 and a decision as to whether the proposal should be implemented will be agreed. **Please note that the above date may be subject to change.** 

#### **Decision Notification**

Subject to the proposal being implemented, a decision notification will be made available to all consultees. This notification will also be published on the Council's website as soon as possible following the decision.