

**Proposal to reconfigure and remodel  
Behaviour Support Services at Ysgol  
Rhydygors to improve provision for  
children and young people**

**Consultation Report**



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Cyngor Sir Gâr  
**Carmarthenshire**  
County Council



## **School Modernisation Section**

**Sara Griffiths**, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

**Email:** [DECMEP@carmarthenshire.gov.uk](mailto:DECMEP@carmarthenshire.gov.uk)

**Telephone: 01267 246618**

## **Acronyms**

ALN Additional Learning Needs

ALNco Additional Learning Needs Co-ordinator

BESD Behavioural, Emotional and Social Difficulties

DCF Digital Competence Framework

ECPs Education and Child Psychologists

ELSA Emotional Literacy Support Assistant

EOTAS Education other than at School

ESA Education Support Advisor

ICF Integrated Care Fund

IDP Individual Development Plan

LA Local Authority

LALI Local Authority Link Inspector

MEP Modernising Education Programme

OPP One Page Profiles

PCP Person-Centre Practice

PIAP Post Inspection Action Plan

PRU Pupil Referral Unit

SEN Special Educational Needs

SLT Senior Leadership Team

TAs Teaching Assistants

TAPPAS Team around Pupils Parents and Settings

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## Executive Summary

### The Consultation Period

On the 11<sup>th</sup> January 2021 Carmarthenshire County Council published a proposal to:

- Reconfigure and remodel Behaviour Support Services at Ysgol Rhydygors to improve provision for children and young people

The consultation period commenced on 11<sup>th</sup> January 2021 in line with the publication of the proposal and closed on 16<sup>th</sup> July 2021 with a total of 53 responses received (excluding the responses received from Estyn and the pupils' consultation event) in response to the formal consultation.

Responses Received			
Online Survey	E-mail	SNAP Cymru	Total
50	1	2	53

It must be noted that of the 53 observations received, all were received prior to the end of the consultation period.

### Consultation Events

Due to the ongoing implications of the Coronavirus pandemic we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result virtual drop-in sessions were held via Microsoft Teams.

#### Informal

Virtual informal drop-in sessions were held prior to the beginning of the formal consultation period with relevant stakeholders.

#### Formal

A virtual formal drop-in session was held on **27 January 2021 at 4:30pm for a period of two hours**. The formal consultation drop-in session was attended by 21 stakeholders.

In addition, Ysgol Rhydygors held a Question-and-Answer opportunity for both pupils and parents in relation to the proposal.

## Responses Received

The responses received have been categorised into the following themes:

### Supportive

- Theme 1 – No reason
- Theme 2 – Support for the proposal
- Theme 3 – Ensuring provision meets the needs of pupils
- Theme 4 – Safeguarding staff employment
- Theme 5 – Staff and pupil wellbeing
- Theme 6 – Capacity of provision
- Theme 7 – Financial position
- Theme 8 – Benefits of the change for pupils
- Theme 9 – Learning environment
- Theme 10 – Support for senior management
- Theme 11 – Curriculum provision
- Theme 12 – Staffing levels
- Theme 13 – Transition
- Theme 14 – Re-integration to Mainstream Education

### Unsure (respondents did not answer yes or no)

- Theme 1 – Model of provision

### Concerns

- Theme 1 – Staff employment
- Theme 2 – Impact of change on pupils
- Theme 3 – No reason
- Theme 4 – Leadership
- Theme 5 – Suitability of PRU provision
- Theme 6 – Future residential provision
- Theme 7 – Timing of implementation
- Theme 8 – Re-integration to Mainstream Education
- Theme 9 – Upskilling of staff
- Theme 10 – Impact on mainstream schools

## Overall Summary

Supportive	55%	Not supportive	43%	Unsure	2%
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## **Workshops**

Following the closure of the consultation period on the 16 July 2021 a workshop was held to analyse the observations received.

## **Next Steps**

The Consultation Report will be presented to the Cabinet (previously known as the Executive Board) who may decide to publish the proposal as consulted upon with appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice this will be published in due course.

## Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
<b>Supportive Comments Raised</b>				
1.	<b>No reason</b> Some respondents did not provide a reason for their support.		16	30%
2.	<b>Support for proposal</b> Respondents supported the proposal to discontinue Ysgol Rhydygors and establish a Pupil Referral Unit (PRU). The benefits of a PRU were recognised as an improvement in provision.	The proposal is part of the wider Behaviour Services review and the Carmarthenshire Four Phase model. This change will ensure a better strategic fit for this unit within the wider strategy and better serve the learners who'll attend the facility.	3	6%
3.	<b>Ensuring provision meets the needs of pupils</b> Respondents acknowledged that the facility would need to be staffed by suitably qualified and experienced teachers with provision tailored to the needs of individual pupils. It was acknowledged that the PRU model would allow pupils to access	The Local Authority (LA) agrees that suitably qualified and experienced staff will be sought. Potential employees that have relevant specialisms, the capacity to further develop professionally and have the appetite and inclination to work in this area of service delivery will be sought after. The Four Phase model strives to ensure that as many young people as possible have access to mainstream education. Following a successful period of specialised	2	4%

	mainstream provision where appropriate.	support at the PRU, pupils can be considered to be reincluded in mainstream. Pupils attending the provision will have had their needs clearly identified and robust planning and interventions will be provided to support each learner. All learners will be frequently monitored and their progress reviewed to identify the most appropriate provision to meet their needs.		
4.	<b>Safeguarding staff employment</b> Respondents noted the need to safeguard the positions of current staff members, for the benefit of pupils.	See answer to point 3 above.	2	4%
5.	<b>Staff and pupil wellbeing</b> Respondents noted the requirement to support staff and pupil wellbeing during the change process to ensure limited disruption.	The LA agrees with this perspective and will make the necessary arrangements for this to be facilitated.	2	4%
6.	<b>Capacity of provision</b> Respondents questioned whether the proposal would impact on the number of pupils accessing the PRU provision.	There is no current intention to change the capacity of the provision so the number of pupils who can access provision will remain the same.	1	2%
7.	<b>Financial position</b> Respondents sought information on the proposed budget and in particular: whether costs of providing more creative learning had been included in the proposed budget; how ongoing costs of the PRU provision would be met and	The creative learning delivered in PRUs has been developed by staff currently employed there and volunteering to attend training to develop a creative curriculum listening to pupil voice and attempt to have a more engaging curriculum to meet the needs of learners. The curriculum developed in these settings has been developed using the budget already available.	1	2%

	whether spending per learner would remain the same or be increased.	<p>The rationale for staff budget is that the pupils will retain a high pupil to staff ratio with 1 teacher and 2 support staff for each class of six pupils. In addition, there will be a Centre Manager and an Additional Learning Needs Co-ordinator (ALNCo) and will fall within the overall Four Phase Model of Support with an overarching senior leadership team comprising of Phase 2, 3 and 4 Managers.</p> <p>The consultation is not about saving money but providing a more equitable approach to working with learners with Behavioural, Emotional and Social Difficulties (BESD), ensuring all have equal opportunities and that we have far more focus on early intervention.</p>		
8.	<p><b>Benefits of change for pupils</b>  Respondents asked what the benefits of the proposed changes are for the current pupils of Ysgol Rhydygors.</p>	<p>The benefits of the Four Phase Model for pupils with BESD, more complex needs and for those requiring long term educational placements include:</p> <ul style="list-style-type: none"> <li>• The strategy for meeting the needs of learners with BESD, more complex and long- term needs, will be led by the Education &amp; Children’s Services (ECS) Department, robustly governed, implemented and evaluated by a skilled, shared Management Committee that understands the varying needs of these learners and how to meet these needs.</li> <li>• Pupils will access effective provision that is needs led and equitable in terms of holistic support, wellbeing and learning experiences with effective practice being shared across the PRU settings and the relevant areas of the Four Phase model.</li> <li>• Increasingly pupils’ needs will be met within their mainstream schools due to the effective support and professional development opportunities provided via</li> </ul>	1	2%

		<p>the Four Phase model. As a result, pupils' learning and wellbeing needs will be met via a hybrid model, including access to relevant mainstream school or partnership learning experiences or provision within the PRU structure; ratios will vary depending on pupils' needs.</p> <ul style="list-style-type: none"> <li>• Improved continuity in the Carmarthen area for pupils moving from primary to secondary aged PRU provision; familiar systems, processes and staffing alongside high expectations.</li> <li>• Providing for these learners via one PRU system provides: <ul style="list-style-type: none"> <li>➤ Clarity of vision and expectation.</li> <li>➤ Collaboration and learning amongst staff and leaders, sharing effective practices and evaluating constructively in a self-improving manner.</li> <li>➤ Collegiate governance via a management committee, building expertise in relation to the provision required to meet the needs of pupils with BESD, complex or long-term needs.</li> <li>➤ An innovative, needs led curriculum, sharing staffing expertise and resources across the PRUs and maximising the shared opportunities that this will enable.</li> <li>➤ Flexibility in relation to the deployment of staffing to meet pupils' needs and to lead strategic areas in a distributed manner.</li> <li>➤ Economies of scale, providing shared learning experiences for pupils.</li> </ul> </li> </ul>		
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		<ul style="list-style-type: none"> <li>➤ A larger learning community for pupils to develop their social and learning skills in a safe, inspirational yet empathetic environment.</li> <li>➤ Provision for learners within Trauma Informed environments where the curriculum is designed to ensure that pupils' wellbeing, social, vocational and academic needs form the basis of all learning experiences.</li> <li>➤ Residential provision is included within the Four Phase Model; the ethos, care and wellbeing will align directly to the learning provision accessed during the day providing a settled, familiar environment for all.</li> </ul> <p>In summary, the rationale for the school to become a PRU is to provide pupils with an inclusive and aspirational learning pathway that does not restrict them to remaining in a small (currently 38 pupils on register) setting from KS2-KS4 with a narrow curriculum and a lack of aspiration to return (even in part) to mainstream provisions.</p> <p>Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF (Digital Competence Framework) that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.</p>		
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		<p>The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.</p> <p>The proposed changes allow for greater professional development for our staff across settings as the robust leadership structure will allow for greater opportunity to also access leadership experiences.</p>		
9.	<p><b>Learning environment</b> Respondents noted that the current site and buildings are not fit for purpose and require development. Respondents asked whether there would be any improvements/adaptations made to the learning environment to facilitate their new use and what funding was available to support this.</p>	<p>How will the school / PRU site be improved?</p> <ul style="list-style-type: none"> <li>• Provision will be shared with the current PRU currently on site for the primary aged pupils, enhancing the learning environment for all.</li> <li>• The department are currently undertaking a review of its Modernising Education Programme (MEP) which includes all the county's schools including Ysgol Rhydygors.</li> <li>• The outdoor learning environment has been re-designed to align to the learning offer. This includes: <ul style="list-style-type: none"> <li>➤ Covered areas for play and learning.</li> <li>➤ The development of gardening zones and provision for keeping small animals.</li> </ul> </li> <li>• Internal and external areas have been de-cluttered and have been re-purposed to include nurture areas and purposeful learning areas, for example,</li> </ul>	1	2%

		<p>hairdressing and music technology facilities are now in place.</p> <p>Specifically in relation to Recommendation 5 from the ESTYN report</p> <p><b>R5 Improve the learning environment</b></p> <p>As a result of relevant training and ongoing advice the learning environment across the school is improving. Across key stage 2 there is a focus on implementing a nurture influenced provision, for example clear routines for the school day, a range of multi-sensory opportunities, and the potential for improved outdoor spaces to be used as valuable learning spaces.</p> <p>Leaders are developing worthwhile links with other providers to enhance the environment, for example, staff from the Botanical Gardens of Wales.</p> <p><b><u>Next steps:</u></b></p> <ul style="list-style-type: none"> <li>• Plan purposefully for outdoor learning opportunities.</li> <li>• Continue to reflect on the progress of the nurture-based environment and its impact on pupils.</li> </ul>		
10.	<p><b>Support for senior management</b> Respondents asked how the Local Authority would support the Head Teacher and Senior Leadership</p>	<p>Since September 2014 Ysgol Rhydygors has had a very challenging period retaining consistent senior leadership and governance. There have been five headteachers appointed, one permanent and four interims. The acting</p>	1	2%

	<p>team during the time of uncertainty and change.</p>	<p>headteacher at the time of the last inspection was appointed in September 2018 but resigned from the school in Spring Term 2021. The remainder of the leadership team, as it stood at that time, have since resigned to go to new posts.</p> <p>To support the school the Local Authority have seconded leaders to create an interim leadership team for the school.</p> <p>Benefits of the Current LA leadership arrangements in place at Rhydygors, which align to the future Four Phase Model proposal, and the positive impact to date:</p> <ul style="list-style-type: none"> <li>• Improved leadership from Interim LA Headteacher with access to staffing and processes across the PRUs. Leadership sits on the ministerial advisory group, accessing and informing current developments for vulnerable children.</li> <li>• Direct leadership support from the Local Authority's Education other than at school (EOTAS) Manager, leading to improved culture and expectations regarding positive behaviours and engagement in learning.</li> <li>• Sharing of expertise across the PRU settings and improving learning provision, for example, collaboration across the Senior Leadership Team (SLT) has led to a shared vocational offer for pupils at key stage 4.</li> <li>• More effective multi-agency support is now commissioned by the leadership team; this is having a positive impact on provision and progress.</li> </ul>		
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		<ul style="list-style-type: none"> <li>• More robust evaluation of current provision and subsequent improvement planning.</li> <li>• Leadership continuity across the primary provision being provided by the primary PRU lead.</li> </ul>		
11.	<p><b>Curriculum provision</b> Respondents asked for clarity on how the curriculum provision would be better than at present.</p>	<p>The curriculum offer was not engaging pupils effectively. When asked for pupil voice regarding their curriculum pupils felt the curriculum offer was not interesting.</p> <p>In line with the New Curriculum for Wales we will require our teachers to be specialist and flexible so that we can offer pupils Enabling Adults, Enabling Environments and Enabling Experiences (Welsh Government Enabling Pathways document currently in consultation).</p> <p>As stated previously Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.</p> <p>The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.</p>	1	2%

12.	<p><b>Staffing levels</b>  Respondents asked whether the staffing levels would remain the same or be increased.</p>	<p>As stated in the finance section our intention is to keep a high staff to pupil ratio with one teacher and two support assistants for each class of six pupils.  Each pupil has an Individual Development Plan (IDP) and this will reflect their specific need and identify the need for a higher staff ratio with a rationale and what the higher ratio will achieve.</p>	1	2%
13.	<p><b>Transition</b>  Respondents asked what steps the Local Authority would take to ensure a smooth transition for pupils from school to PRU provision.</p>	<p>As the Acting Head and other members of the leadership team resigned and recruitment and secondment options failed to provide professionals needed the Local Authority placed an interim leadership team in the school.</p> <p>If the outcome of the consultation is to discontinue the school and establish a PRU there will be a minimum of one term allowing for a new staffing structure to be introduced. It is hoped that staff within the structure who are familiar with the pupils will be part of this structure.  As location will remain the same and we are hopeful that a number of staff will be the same, pupils will not have a huge amount of change to deal with. Pupils have already been introduced to new leadership and this has provided positive outcomes. Any new member of staff will be welcomed and slowly begin to meet pupils and build relationships.  In addition, we are implementing processes, in line with Additional Learning Needs (ALN) reform, to change statements to IDPs. In these review meetings we will be using person centred approaches to listen to pupil voice and parent/carers as well as professionals and will be co-</p>	1	2%

		<p>creating plans to ensure that any progress is recognized and celebrated and any current needs and how they can be supported are clear and transparent so that the learner, family and professionals work together and feel part of the creation of the plan and feel they have some control in how, what and where they undertake their learning and support.</p>		
14.	<p><b>Re-integration to Mainstream Education</b>  Respondents questioned whether the proposal would be used to re-educate and remodel behaviour with the view of encouraging pupils back in to mainstream education with support.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting</p>	1	2%

		<p>and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p> <p>The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.</p>		
<b>Unsure (respondents did not answer yes or no)</b>				
<b>1.</b>	<p><b>Model of provision</b> Respondents asked for clarity on what the new model of provision would look like compared to current provision.</p>	<p>We are seeking to ensure that pupils attending specialist provision (school or PRU) have equity regarding interventions and curriculum offer regardless of the site of their provision.</p> <p>The future model of the provision would include a provision working with a restorative ethos and trained staff who are trauma informed. We would like to offer a trauma recovery model in the setting. We are also working to increase accreditation available and increase qualifications available offering more vocational and bespoke education programmes. We also intend to create more outdoor learning opportunities and targeted wellbeing interventions that are tracked, monitored and evaluated.</p> <p>We can increase accreditation and curriculum offer by having staff working together across the PRU provisions (Phase 3 of the 4 Phase Model) to offer a greater number of subject specialisms and greater offer of vocational courses and accredited courses. Working together rather</p>	<b>1</b>	<b>2%</b>

		than in individual settings allows for greater expertise to be shared.		
<b>Concerns Raised</b>				
<b>1.</b>	<b>Staff employment</b> Respondents raised concerns regarding the future employment opportunities for staff in the PRU should the proposal be implemented and queried whether staff would have to apply for positions in the PRU.	See answer to point 3 above.	<b>5</b>	<b>9%</b>
<b>2.</b>	<b>Impact of change on pupils</b> Respondents highlighted concerns regarding the impact of the change of provision and staffing on pupils.	The Local Authority do not want to lose experience and expertise and the structure going forward would continue to require a high staff to pupil ratio. It is hoped that a significant number of staff currently working at the school with the skills, experience, expertise and desire to work with our learners would wish to work in the setting as a PRU.  In addition, the site is not changing.  With regards to change of provision pupils will continue to be registered as long-term pupils and their provision would only change following a robust delivery, tracking, assessing and review of their needs. All review and progress will be person centred so pupil voice, in addition to parents and professionals will be involved in any decision.	<b>4</b>	<b>8%</b>

3.	<p><b>No reason</b> Some respondents did not provide a reason for their concerns.</p>		3	6%
4.	<p><b>Leadership</b> Respondents questioned whether the proposal was a reaction to the leadership of the school.</p>	<p>The restructure is part of the wider Behaviour Services review and is a strategic restructure.</p>	2	4%
5.	<p><b>Suitability of PRU provision</b> Respondents questioned the suitability of PRU provision especially for those pupils who have previously attended a PRU.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p>	2	4%

		The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.		
6.	<b>Future residential provision</b> Respondents noted concerns for the future of the residential provision.	<p>Residential provision is being considered as part of phase 4 of the LA model.</p> <p>Should the proposal to discontinue Ysgol Rhydygors be approved, the Local Authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors school/Residential Unit.</p> <p>All former Ysgol Rhydygors pupils who have an element of residential education as part of their Special Educational Needs (SEN) Statement will continue to receive this on the site of the former Ysgol Rhydygors school. To coincide and further develop the proposals, the Local Authority are currently in the process of progressing an Integrated Care Fund (ICF) funding application to develop a new, 21st century children's home. This will hopefully enhance the children's home model and provision available and will meet the needs of children both locally and regionally. The scheme is currently in the development stages of design.</p>	2	4%
7.	<b>Timing of implementation</b> Respondents questioned the appropriateness of the timing of the proposal. Respondents were	The timeline for the proposal was prepared in line with the requirements of Welsh Government's <a href="#">School Organisation Code (2018)</a> . In addition, the Four Phase Model has been	2	4%

	<p>concerned with the impact of implementing the proposal prior to other phases of the behaviour model being embedded. In addition, respondents felt that the proposal had been rushed which they believe implies that the proposal has not been fully considered.</p>	<p>written in response to a whole review of Behaviour Support Services in the Local Authority.</p> <p>The Model has been in development initially investing in upskilling staff with training which is the first Phase of the model. The second Phase is creating greater opportunity for specialist support and interventions in mainstream schools and we are developing the TAPPAS model (Teams Around Pupils Parents and Settings) to create a system of identifying training needs to support our young people in their mainstream setting or provide robust packages of support as early as possible in their mainstream setting. Phase 3 is developing a large specialist team for those young people where mainstream is not currently the right environment for them. This is where the PRUs and special schools align so that we can all work together as a large specialist team providing the greatest expertise to the learners at the appropriate time. Phase 4 is the wrap around packages and family work which is also currently under consultation (residential element). In time Phase 4 will also include Post 16 opportunities in line with ALN reform.</p>		
8.	<p><b>Re-integration to Mainstream Education</b></p> <p>Respondents were concerned that the proposal would involve a focus on re-integrating pupils into a mainstream setting and the detrimental impact this could have on pupils.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made</p>	2	4%

		<p>enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p> <p>The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.</p>		
9.	<p><b>Upskilling of staff</b>  Respondents noted whether appropriate training could be provided to upskill staff to meet the needs of the proposed provision.</p>	<p>The four-phase model is predicated on a strong model of staff Continuing Professional Development and upskilling will be supported.</p>	1	2%

<p><b>10.</b></p>	<p><b>Impact on mainstream schools</b>  Respondents queried whether the implementation of the proposal would pose challenges for Mainstream schools.</p>	<p>As part of the Four Phase model there is greater support provided to mainstream schools from the behaviour support community team and greater emphasis on early intervention and working restoratively to support schools, pupils and families (refer to TAPPAS Pilot). Most recently, as evidence of our commitment to support schools the team will be increasing from 6 to 14 members.</p>	<p><b>1</b></p>	<p><b>2%</b></p>
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## Estyn's Observations regarding the Proposal

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

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 and other additional information such as data from Welsh Government and the views of the Regional Consortia, which deliver school improvement services to the schools within the proposal.

1. All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors School. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole, this consultation document relates to point 1 only. **Points 2 and 3 noted below will be undertaken via separate procedures.**

2. Should the above (point 1) be approved, the local authority will establish a pupil referral unit (PRU) on the site of the former Ysgol Rhydygors school as of 1st January 2022.
3. Additionally, should point 1 be approved, the local authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors school/Residential Unit as of 1st January 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN statement will continue to receive this on the site of the former Ysgol Rhydygors School.

## **Summary/ Conclusion**

Ysgol Rhydygors is a purpose built maintained residential special school. At the time of the last core inspection in November 2019, there were 37 pupils on roll aged from 7 to 16 years. All pupils have a statement of special educational needs (SEN) or an individual development plan (IDP) primarily for social emotional and behavioural difficulties (SEBD). The school is in Estyn Review having received judgements of adequate and needs improvement across all five inspection areas. The school has five recommendations for improvement.

The school was previously inspected in September 2014. Since this time, there have been five headteachers appointed, one permanent and four interim. The current interim headteacher was appointed in September 2018.

Pupil numbers across the school have fluctuated over the last five years. There has been a decline in residential pupil numbers during the same time.

Overall, the consultation document lacks sufficient detail on the proposal to close Ysgol Rhydygors special school. The rationale provided from the local authority to close the special school and establish it as a pupil referral unit is unclear. There is insufficient information provided on the benefits of this proposal for pupils with SEBD and especially those with needs that are more complex and require long-term educational placements.

## **Description and benefits**

Currently the local authority has a range of settings in which pupils with SEBD are supported, a total of four providers, which includes Ysgol Rhydygors and three pupil referral units (PRUs). The local authority's vision is to bring provisions together under one Specialist Behaviour and Wellbeing Support Service Team under a four phase model. Increased access to the Behaviour Support Service Team as part of the early intervention model to support clusters of schools is suggested. The four phases of the model outlined in the consultation does not contain sufficient detail, especially on phases 3 and 4.

**Page 9 paragraph 4**, the proposal identifies historical evidence that suggests pupils remain long term at Ysgol Rhydygors with no further mainstream experience. It is unclear why at the annual review of pupils' statements, discussions on the current educational setting including the option to access mainstream provision, where appropriate, is not taking place. The local authority has a statutory duty to review and monitor pupils with statements which includes their educational placement. Additional detail would be helpful to understand the local authority rationale for this comment. The local authority does not have to decommission the school to promote opportunities for pupils to access mainstream settings where appropriate.

**The proposal on page 10**, paragraph 3 state 'for reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3 tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a PRU'. It is unclear why the specialist support cannot be offered to Ysgol Rhydygors but would be available if it were a PRU. The proposal seem to imply that currently, Ysgol Rhydygors

is not able to provide a broad and balanced curriculum with a range of accreditation or individualised bespoke education plans. There is no evidence to suggest this is the case based from our last inspection. Additionally, the proposal mentions a four phase model in the consultation and a 3 tiered approach. It would be helpful to have greater clarity on these and how they complement each other.

**On page 10, paragraph 3** the proposal discusses ‘enhancement of the PRU model will more appropriately cater for the needs of society...’ there is no further detail on what the ‘enhancement’ is or how this would differ from the current offer at Ysgol Rhydygors.

It seems that the proposal is suggesting that pupils with the most complex and challenging SEBD needs would receive their education in a PRU. It is not clear if pupils would continue to require a statement to access such provision and at which tier or phase this would be appropriate.

**Page 11, paragraph 1**, the proposal is putting forward a plan for an ICF funding application to develop a new, 21st century children’s home. The core inspection identified the need to improve the learning environment in the school. The proposal does not comment on how the school site will be improved. If the site requires improvement as a school, it seems logical the same would apply should there be the establishment of a PRU.

The proposal makes suitable reference on their commitment to a bilingual service. Concern for the progress of pupils at Ysgol Rhydygors who are Welsh first language was raised during the last inspection.

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

Currently the proposal has limited information on the intended outcomes or benefits for pupils in moving from a special school to accessing PRU provision. The rationale to decommission the school is unclear. PRUs are primarily a short-term provision where there is an expectation that all pupils should re-integrate into mainstream. This approach might not suit all pupils with SEBD as their needs are so complex that they cannot function in the mainstream environment. In the list of options considered, the LA has not proposed that Ysgol Rhydygors be the centre for excellence for SEBD in the LA.

**On page 13 bullet point 1** under disadvantages the proposal identifies that ‘initially schools will be nervous that a long-term school provision will not be available in more complex cases’. Currently the consultation paper does not provide sufficient information on what will be available for these pupils.

### **Page 13- Impact on SEN**

The proposal implies that the addition of a PRU to the current Rhydygors site would cater for the diverse range of pupils of all ages with SEBD. This is currently the case with Ysgol Rhydygors sharing its site with one of the three already established PRUs. It is therefore unclear how the closure of the special school and opening of an additional PRU would provide a different and improved overall provision for pupils with SEBD across the local authority.

### Page 14- Admission arrangements

The proposal states ‘there are some pupils who present with significant, persistent challenges relating to their social, emotional, and behavioural difficulties and require specialist long-term day or residential SEBD provision in Ysgol Rhydygors’. It is unclear where and how the needs of these pupils will be met under the current proposal to close the school.

The proposal states that ‘The discontinuation of Ysgol Rhydygors and the creation of a PRU to cater for the needs of a diverse range of pupils of all ages and stages of development on one co-located site will ensure a consistent approach to the relevant teaching strategies across all key stages, including the foundation phase’. There is limited evidence in the current consultation to support this statement. The proposal does not provide sufficient evidence to clarify why the special school is not seen as part of the behavioural continuum of provision for SEBD pupils.

### Page 16- Alternative Options Considered

In developing a preferred option, the proposal includes a range of alternative options. Additional comments from Estyn in **bold**.

Option 1	Status Quo	Does not address the variation in provision for pupils with SEBD in Carmarthen. - <b>it is unclear from the information provided in the consultation what the ‘variation’ in provision is currently.</b>
Option 2	Discontinue Ysgol Rhydygors and provide for pupils in the current Carmarthenshire Secondary Teaching and Learning Centre	Insufficient capacity in Carmarthenshire’s Secondary Teaching and Learning Centre to accommodate Ysgol Rhydygors pupils. - <b>what about the primary pupils in the school? What are the projected pupil numbers in the authority who require this provision and would they necessitate a fourth PRU being established?</b>
Option 3	Discontinue Ysgol Rhydygors and cater for pupils in mainstream schools	Schools will require specialist support that cannot be delivered in mainstream. - <b>based on pupil statements this doesn’t seem to be a viable option.</b>

Option 4 (Preferred)	Discontinue Ysgol Rhydygors and provide for pupils in a new Pupil Referral Unit (PRU) on the Ysgol Rhydygors school site.	Creates consistency in the quality and standard of provision on offer for pupils with SEBD in Carmarthenshire and limits disruption for pupils. - <b>it may be the case that consistency in the quality and standard of provision offered could be developed at Ysgol Rhydygors</b>
Option 5	Discontinue Ysgol Rhydygors and provide no alternative provision	Does not cater for the needs of pupils with SEBD in Carmarthen.

## Local Authority Response to Estyn's Observations

### Issues raised by Estyn and LA responses

1. *Overall, the consultation document lacks sufficient detail on the proposal to close Ysgol Rhydygors special school. The rationale provided from the local authority to close the special school and establish it as a pupil referral unit is unclear. There is insufficient information provided on the benefits of this proposal for pupils with SEBD and especially those with needs that are more complex and require long-term educational placements.*

### LA Response

The Local Authority undertook a behaviour review in 2018 which resulted in a number of recommendations being made to transform the provision that was available and to ensure that the needs of all pupils are effectively met.

In response to this review a behaviour and wellbeing transformation manager was employed to undertake the task of transforming the services.

A Four Phase Model has been developed in consultation with primary and secondary Headteachers, Service Managers and Heads of Service and phases 1,2,3 are currently being successfully implemented across the authority.

**The aim of the Four Phase Model**, which includes the proposed discontinuation of Ysgol Rhydygors, is to ensure high quality, equitable provision for all learners across all schools and settings in Carmarthenshire. The model will ensure greater inclusion in mainstream settings by providing appropriate training and support for staff; early identification and intervention aims to ensure that learners successfully remain in mainstream wherever possible and appropriate or that a blend of mainstream and

PRU provision meets their learning needs more effectively. Those pupils with more complex needs may access their provision solely through the PRU settings, if this is what is required.

**Please see summary of the Four Phase Model outline attached at appendix A.**

**The benefits of the Four Phase Model for pupils with BESD, more complex needs and for those requiring long term educational placements include:**

- The strategy for meeting the needs of learners with BESD, more complex and long- term needs, will be led by the Education & Children’s Services Department, robustly governed, implemented and evaluated by a skilled, shared Management Committee that understands the varying needs of these learners and how to meet these needs.
- Pupils will access effective provision that is needs led and equitable in terms of holistic support, wellbeing and learning experiences with effective practice being shared across the PRU settings and the relevant areas of the Four Phase model.
- Increasingly pupils’ needs will be met within their mainstream schools due to the effective support and professional development opportunities provided via the Four Phase model. As a result, pupils’ learning and wellbeing needs will be met via a hybrid model, including access to relevant mainstream school or partnership learning experiences or provision within the PRU structure; ratios will vary depending on pupils’ needs.
- Improved continuity in the Carmarthen area for pupils moving from primary to secondary aged PRU provision; familiar systems, processes and staffing alongside high expectations.
- Providing for these learners via one PRU system provides:
  - Clarity of vision and expectation.
  - Collaboration and learning amongst staff and leaders, sharing effective practices and evaluating constructively in a self-improving manner.
  - Collegiate governance via a management committee, building expertise in relation to the provision required to meet the needs of pupils with BESD, complex or long-term needs.
  - An innovative, needs led curriculum, sharing staffing expertise and resources across the PRUs and maximising the shared opportunities that this will enable.
  - Flexibility in relation to the deployment of staffing to meet pupils’ needs and to lead strategic areas in a distributed manner.
  - Economies of scale, providing shared learning experiences for pupils.
  - A larger learning community for pupils to develop their social and learning skills in a safe, inspirational yet empathetic environment.
  - Provision for learners within Trauma Informed environments where the curriculum is designed to ensure that pupils’ wellbeing, social, vocational and academic needs form the basis of all learning experiences.

- Residential provision is included within the Four Phase Model; the ethos, care and wellbeing will align directly to the learning provision accessed during the day providing a settled, familiar environment for all.

### **Challenges of retaining the current Rhydygors School include:**

- Since September 2014 Ysgol Rhydygors has had a very challenging period retaining consistent senior leadership and governance. There have been five headteachers appointed, one permanent and four interims. The acting headteacher at the time of the last inspection was appointed in September 2018 but resigned from the school in Spring Term 2021. The remainder of the leadership team, as it stood at that time, have since resigned to go to new posts.
- Recruitment of suitably qualified and experienced permanent teachers to stabilize the structure has also been challenging. The impact of having a frequent change of staff, high staff absence, high levels of temporary or supply staff directly impacts on the progress and outcomes of learners.
- Lack of flexibility to deploy staffing from the PRU teams into the school to meet pupils needs.
- Recruiting governors with the appropriate skills to govern a special school is exceptionally challenging.
- Children who are placed at Ysgol Rhydygors do not return to mainstream; neither staff, nor children and young people consider this to be an option.
- The lack of consistency and expertise amongst staffing leads to variable progress for pupils.
- Overtime, leadership expectations are not sufficiently aspirational for the learners, despite challenge being provided robustly from the Local Authority.
- Despite the Local Authority providing the school with high levels of support from the Education Support Advisors (ESAs), Additional Learning Needs Department and training packages for both teaching and learning to improve academic success and training for supporting emotional wellbeing, the impact overtime remains variable due to the high turnover of staff.
- Staff report wellbeing concerns: they do not routinely collaborate with mainstream schools nor with the PRU settings.
- Parental and pupil perception of the school can be poor.

### **Benefits of the Current Local Authority leadership arrangements in place at Rhydygors, which align to the future Four Phase Model proposal, and the positive impact to date:**

- Improved leadership from Interim Local Authority Headteacher with access to staffing and processes across the PRUs. Leadership sits on the ministerial advisory group, accessing and informing current developments for vulnerable children.

- Direct leadership support from Local Authority's EOTAS Manager, leading to improved culture and expectations regarding positive behaviours and engagement in learning.
- Sharing of expertise across the PRU settings and improving learning provision, for example, collaboration across the Senior Leadership Team has led to a shared vocational offer for pupils at key stage 4.
- More effective multi-agency support is now commissioned by the leadership team; this is having a positive impact on provision and progress.
- More robust evaluation of current provision and subsequent improvement planning.
- Leadership continuity across the primary provision being provided by the primary PRU lead.

In summary, the rationale for the school to become a PRU is to provide pupils with an inclusive and aspirational learning pathway that does not restrict them to remaining in a small (38 pupil) setting from KS2-KS4 with a narrow curriculum and a lack of aspiration to return (even in part) to mainstream provisions.

Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.

The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.

The proposed changes allow for greater professional development for our staff across settings as the robust leadership structure will allow for greater opportunity to also access leadership experiences.

2. *The four phases of the model outlined in the consultation does not contain sufficient detail, especially on phases 3 and 4.*

## **LA Response**

**Please see the Four Phase Model of Behaviour Support Services attached at appendix B and detail included above.**

3. ***Page 9 paragraph 4, the proposal identifies historical evidence that suggests pupils remain long term at Ysgol Rhydygors with no further mainstream experience. It is unclear why at the annual review of pupils' statements, discussions on the current educational setting including the option to access mainstream provision, where appropriate, is not taking place. The local***

*authority has a statutory duty to review and monitor pupils with statements which includes their educational placement. Additional detail would be helpful to understand the local authority rationale for this comment. The local authority does not have to decommission the school to promote opportunities for pupils to access mainstream settings where appropriate.*

## **LA Response**

There is a system to ensure annual reviews are undertaken. The Additional Learning Needs Department in the Local Authority holds a central record and there is a robust system in place to ensure annual reviews take place. Due to issues of consistency in leadership, lack of evidence for robust monitoring and evaluation of progress, lack of evidence for programmes of support for the hardest to reach pupils, there appears to be little evidence of progress made that would suggest that during an annual review there would be enough evidence of change for professionals to recommend that a child could engage positively in a mainstream education.

Referencing the information shared above, the proposed changes will mitigate the concern noted here.

- 4. The proposal on page 10, paragraph 3 state 'for reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3-tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a PRU'. It is unclear why the specialist support cannot be offered to Ysgol Rhydygors but would be available if it were a PRU. The proposal seems to imply that currently, Ysgol Rhydygors is not able to provide a broad and balanced curriculum with a range of accreditation or individualised bespoke education plans. There is no evidence to suggest this is the case based on our last inspection. Additionally, the proposal mentions a four-phase model in the consultation and a 3-tiered approach. It would be helpful to have greater clarity on these and how they complement each other.*

## **LA Response**

### **How does the 3 Tier approach feature within the Four Phase model?**

Phase 3 of the 4 Phase Model describes specialist settings which are the Local Authority's Teaching and Learning Centres (PRUs). The current system in the secondary BESD PRUs has three tiers of support which simply summarised is as follows:

Once in the PRU:

Tier 1 – pupils attend the BESD Teaching and Learning Centre but also access some form of mainstream provision. They may attend their mainstream school; they may be transitioning back into their mainstream school, or they may attend a college placement.

Tier 2- pupils attend the teaching and learning centre on site on a full-time timetable.

Tier 3 – pupils are those pupils who have high end complex needs around their mental health and regulating their emotions which require them to have a bespoke package of support to meet their identified specific needs. These pupils often require trauma

informed practice and access to bespoke packages of support using alternative accreditation packages, outdoor learning, bespoke vocational and wellbeing support to build positive relationships with staff, develop a sense of safety with staff and gradually build their package of support to gain higher levels of engagement with support services and their education plan.

### **Ysgol Rhydygors Curriculum, access to accreditation and impact of the bespoke education Plans:**

- Please note below the June 2021 update to the Local Authority Link Inspector (LALI), including the next steps required.
- References to planning with other settings – this is a reference to working with other PRUs in line with the Four Phase Model.
- Ysgol Rhydygors is receiving significant Local Authority officer support to ensure that the professional development of staffing leads to improved provision for pupils.

### **R1 Raise standards and improve pupils' literacy and numeracy skill.**

The school is collaborating successfully to develop an aspirational vocational offer across key stages 3 and 4. As a result there is a more comprehensive offer that is impacting positively on engagement. An audit of staff skills is supporting more effective deployment of staff to secure delivery of this vocational model.

Across key stage 2 there is a clear focus on the developing nurture influenced environment as a resource to develop both engagement and skills.

Staff are being supported by officers from a range of departments to assess and plan accurately for improvement in literacy and numeracy. However, there has been limited evaluation of its impact on pupils' progress to date.

#### **Next steps:**

Continue to increase purposeful opportunities for pupils and young people to apply their skills across the broadening curriculum offer.

### **R2 Improve pupils' behaviour and attitudes to learning**

There is greater consistency of process across the school. A trauma informed model aims to support consistent practice, providing the bespoke training programmes for all staff. A range of Local Authority officers are supporting the development of consistent approaches. As a result, the learning coaches are impacting positively on the KS3 and KS4 vocational offer, which is resulting in the increased engagement of young people.

Across key stage 2, One Page Profiles (OPP) evidence pupil and peer voice which is supporting a nurture influenced environment. Sensory profiles have been completed for key stage 3 pupils, with plans to profile primary phase pupils. Sensory Processing

training is planned for all staff based on the outcomes of these profiles which will further support an enabling provision that impacts on wellbeing and behaviour.

However, due to inconsistent staffing arrangements there is still significant variation across the setting that limits the impact for success.

#### **Next Steps:**

- Further develop the impact of training so that it impacts on the environment and pupils and young people.
- Develop the use of Person-Centred Practice (PCP) tools with parents so that the information gathered informs planning.
- Embed the Relationships policy with all stakeholders

### **R3 Improve the quality of teaching and the effectiveness of assessment**

Leaders are providing further opportunities for all teachers to develop their expertise. A more strategic approach is ensuring that all staff are responsible for implementing the change in their classrooms.

Teachers continue to engage with a range of Local Authority officers and are also linking with mainstream schools and other specialist settings. The focus for development is maximising the potential of enabling environments, communication as an intervention and accurate approaches to observation, assessment, and planning. This further develops the peer support that has supported the shared approaches to thematic planning and the contribution of pupil voice.

However, the strategy to support teaching, learning and assessment is still in the early stages of implementation.

#### **Next steps:**

- Through improved approaches to observation, assessment and planning, develop curriculum experiences through a person-centred approach.
- Personalise strategies that ensure pupils make engage and make effective progress from their starting point.
- Plan for a highly appropriate indoor and outdoor provision that addresses pupils' and young people's individual needs.

### **R4 Strengthen improvement planning**

As a result of improving self-evaluation processes, health and safety processes are consistent. There is improvement in the vocational provision across key stages 3 and 4 that is impacting on levels of engagement. The learning environment is more inspiring providing greater opportunity for independence and involvement.

An audit of staff skills has resulted in more appropriate deployment of the staff and where staff development is required, robust training, intervention and support has been put in place.

The school will now be supported to prioritise efficient and effective self-evaluation priorities so that it continues to look at the broader need for improvement, including demonstrable impact on pupils and young people.

#### **Next steps:**

- SLT to work with ESA colleagues to evaluate school's reviewed Post Inspection Action Plan (PIAP) against LA action plan to ensure support continues to be relevant.
- SLT to plan a cycle of monitoring that involves a range of stakeholders.

### **R5 Improve the learning environment**

As a result of relevant training and ongoing advice the learning environment across the school is improving. Across key stage 2 there is a focus on implementing a nurture influenced provision, for example clear routines for the school day, a range of multi-sensory opportunities, and the potential for improved outdoor spaces to be used as valuable learning spaces.

Leaders are developing worthwhile links with other providers to enhance the environment, for example, staff from the Botanical Gardens of Wales.

#### **Next steps:**

- Plan purposefully for outdoor learning opportunities. approach and secures connections for the pupils.
- Continue to reflect on the progress of the nurture-based environment and its impact on pupils.

5. ***On page 10, paragraph 3 the proposal discusses 'enhancement of the PRU model will more appropriately cater for the needs of society...' there is no further detail on what the 'enhancement' is or how this would differ from the current offer at Ysgol Rhydygors. It seems that the proposal is suggesting that pupils with the most complex and challenging SEBD needs would receive their education in a PRU. It is not clear if pupils would continue to require a statement to access such provision and at which tier or phase this would be appropriate***

### **LA Response**

#### **How will the Four Phase Model be enhanced / differ to the current offer being provided at Rhydygors?**

The learning experiences at Rhydygors have been very limited; expectations have not been consistently high enough and ongoing challenges in relation to staff recruitment and retention hinder progress, despite professional development from the LA.

Prior to LA headteacher leadership, the learning offer did not meet the needs of all learners effectively.

The Four Phase will offer greater collaboration amongst staff and pupils, robust leadership from an LA led management committee and so forth as noted above.

### **Will all pupils continue to require a statement?**

All pupils currently attending PRUs in the Local Authority have an IDP. This has been a requirement from the Inclusion Panel where placements are considered and agreed in preparation for ALN Reform. Pupils requiring placement in a specialist SEBD setting will have a co-constructed IDP to ensure that their needs have been identified and supported.

6. *Page 11, paragraph 1, the proposal is putting forward a plan for an ICF funding application to develop a new, 21st century children's home. The core inspection identified the need to improve the learning environment in the school. The proposal does not comment on how the school site will be improved. If the site requires improvement as a school, it seems logical the same would apply should there be the establishment of a PRU.*

## **LA Response**

### **How will the school / PRU site be improved?**

- Provision will be shared with the current PRU currently on site for the primary aged pupils, enhancing the learning environment for all.
- The department are currently undertaking a review of its Modernising Education Programme (MEP) which includes all the county's schools including Ysgol Rhydygors.
- The outdoor learning environment has been re-designed to align to the learning offer. This includes:
  - Covered areas for play and learning.
  - The development of gardening zones and provision for keeping small animals.
- Internal and external areas have been de-cluttered and have been re-purposed to include nurture areas and purposeful learning areas, for example, hairdressing and music technology facilities are now in place.

### **7. Educational aspects of the proposal**

*Currently the proposal has limited information on the intended outcomes or benefits for pupils in moving from a special school to accessing PRU provision. The rationale to decommission the school is unclear. PRUs are primarily a short-term provision where there is an expectation that all pupils should re-integrate into mainstream. This approach might not suit all pupils with BESD as their needs are so complex that they cannot function in the mainstream environment. In the list of options considered, the LA has not proposed that Ysgol Rhydygors be the centre for excellence for BESD in the LA.*

## LA Response

Please note above the benefits of the proposed Four Phase Model which will ensure that all learners access high quality learning provision through a hybrid mainstream / PRU approach as is necessary at the varying stages of their educational journey.

The model ensures flexibility and high aspiration for all learners.

Our current PRU structure continues to promote the aspiration to re-integrate to mainstream and there is evidence of successful re-integration and flexibility of approach.

From the difficulties outlined creating the current Ysgol Rhydygors into a centre of excellence is not in line with our proposed Four Phase Model. Our development plan has the aspiration to create all of our Phase 3 provisions to be centres of excellence.

8. ***On page 13 bullet point 1 under disadvantages the proposal identifies that 'initially schools will be nervous that a long-term school provision will not be available in more complex cases'. Currently the consultation paper does not provide sufficient information on what will be available for these pupils.***

## LA Response

The Vision of the Four Phase model is to provide needs led ESB services where inclusion, restorative approaches and early intervention are the key to successfully supporting learners, schools and settings to deliver the support required in a timely manner. By providing the support required at the earliest possible time, with appropriately trained and experienced staff, we will provide the best opportunity for our learners to feel safe and valued so that they do not become disengaged and disaffected.

### **The learning offer will provide the following for all pupils:**

- A restorative, trauma informed culture in which all wellbeing, social and learning needs will be met.
  
- A purposeful blend of learning within the classroom, outdoors and within the community, developing skills, interests and talents that will support all children and young people in leading a happy, fulfilling life.
  
- A broad range of learning experiences, leading to valuable accreditation in KS3 and KS4 to include the following:
  - Construction
  - Outdoor Adventure
  - Countryside Management
  - Small Animal Care
  - Sport
  - Digital Media
  - Cooking
  - Gardening
  - Hair and Beauty

- Public Services
- Duke of Edinburgh
- Princes Trust
  
- Opportunities to work alongside a broad range of –professionals:
  - Dr MZ
  - Botanic Gardens
  - Tir Coed
  - Llandysul Paddlers
  - Area 43
  - Work experience and community opportunities

Key stage 2 experiences will include the offer of a broad and balanced curriculum with access to outdoor learning opportunities together with wellbeing support including trauma informed practice and restorative approaches and close relationships with our multi-agency partnerships to allow us to access services required at the earliest possible time and provide robust holistic plans for our learners.

**In addition, those pupils with more complex needs will access:**

- A Trauma Recovery Model, leading to a bespoke, needs led package specific to their individual identified needs. This aligns to the current Tier 3 model in existing PRUs.

**The Learning environment will include:**

- Indoor and outdoor areas to play and learn.
- Residential facilities that are safe, secure, warm and inviting

**The Four Phase Model will support our vision by ensuring:**

- Collaboration between all staff across the Four Phase model, sharing effective practice, delivering learning experiences in line with their areas of expertise.
- Flexibility in the deployment of staffing across the PRU sites, ensuring that the needs of pupils are met.
- Flexible access to provision across mainstream and PRU settings
- Robust governance from a central management committee.
- Efficient use of resources due to economies of scale.

**9. Page 13- Impact on SEN**

*The proposal implies that the addition of a PRU to the current Rhydygors site would cater for the diverse range of pupils of all ages with SEBD. This is*

*currently the case with Ysgol Rhydygors sharing its site with one of the three already established PRUs. It is therefore unclear how the closure of the special school and opening of an additional PRU would provide a different and improved overall provision for pupils with SEBD across the local authority.*

## **LA Response**

**Please note benefits of the Four Phase model outlined in point 1 (page 27) of this document.**

In addition, please note:

- The provision at the PRU in Carmarthen is for Foundation Phase and KS2 only; extending this provision to KS3 and KS4 also by utilising the Rhydygors site and resources will ensure greater flexibility in the nature of educational provision available for pupils.
- The current provision at Ysgol Rhydygors can only be accessed with a statement.
- As a PRU the learners accessing this provision will require an IDP ensuring greater flexibility to work between mainstream and the PRU. This is particularly significant for those learners in the Northwest of the county who do not access this provision due to travel times. Outreach workers from the PRU will be able to take this provision to the pupils.

### **10. Page 14- Admission arrangements**

*The proposal states 'there are some pupils who present with significant, persistent challenges relating to their social, emotional, and behavioural difficulties and require specialist long-term day or residential SEBD provision in Ysgol Rhydygors'. It is unclear where and how the needs of these pupils will be met under the current proposal to close the school.*

*The proposal states that 'The discontinuation of Ysgol Rhydygors and the creation of a PRU to cater for the needs of a diverse range of pupils of all ages and stages of development on one co-located site will ensure a consistent approach to the relevant teaching strategies across all key stages, including the foundation phase'. There is limited evidence in the current consultation to support this statement. The proposal does not provide sufficient evidence to clarify why the special school is not seen as part of the behavioural continuum of provision for SEBD pupils.*

## **LA Response**

Please note previous responses.

**How will the needs of these pupils be met under the proposed Four Phase model, including the PRU that will replace Ysgol Rhydygors?**

- The Four Phase Model includes training and development to create a consistent inclusive ethos across mainstream schools using restorative approaches and creating a process to have immediate access to the Behaviour Support Community team creating a far earlier intervention model.

- Earlier intervention and a model which creates capacity in school should reduce BESD escalating and reduce complex long term place requests
- When a pupil is placed at a PRU their needs will be continuously monitored and reviewed allowing for greater opportunity to reintegrate to mainstream fully or access part time with an appropriate support package.

**How will the Four Phase model and the creation of a PRU ensure a consistent approach to relevant teaching strategies across all key stages including the Foundation Phase?**

- The new model aligns all the PRUs under one Management Committee
- The new model has a new leadership structure which has a centre manager of each site with an overarching senior leadership team to develop equity and consistency across the settings.

**11. Page 16- Alternative Options Considered**

*In developing a preferred option, the proposal includes a range of alternative options. Additional comments from Estyn in **bold**.*

**LA Response**

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
1	STATUS QUO	Does not address the variation in provision for pupils with SEBD in Carmarthen.	- <b>it is unclear from the information provided in the consultation what the 'variation' in provision is currently.</b>

Response to Option 1 query: The quality of provision, consistent expertise of staff, one governance structure with a planned training programme is in development as part of the Four Phase Model. The variation of staffing levels and budget between PRUs and the school is considerable but the outcomes from the school do not reflect this.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
2	Discontinue Ysgol Rhydygors and provide for pupils in the current Carmarthenshire Secondary Teaching and Learning Centre	Insufficient capacity in Carmarthenshire's Secondary Teaching and Learning Centre to accommodate Ysgol Rhydygors pupils	- <b>what about the primary pupils in the school? What are the projected pupil numbers in the authority who require this provision and would they necessitate a fourth PRU being established?</b>

Response to option 2 query. Historically there has always been two classes (12-14 primary aged pupils). There is currently no intention to increase the capacity of

primary pupils accessing specialist provision. We are increasing the capacity of the Behaviour Support Community Team to be able to provide support to more learners in mainstream. If there is a greater demand in the future this will be addressed but it is not part of the current plan.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
3	Discontinue Ysgol Rhydygors and cater for pupils in mainstream schools.	Schools will require specialist support that cannot be delivered in mainstream.	<b>based on pupil statements this doesn't seem to be a viable option.</b>

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
4 (preferred)	Discontinue Ysgol Rhydygors and provide for pupils in a new Pupil Referral Unit (PRU) on the Ysgol Rhydygors school site.	Creates consistency in the quality and standard of provision on offer for pupils with SEBD in Carmarthenshire and limits disruption for pupils.	<b>– it may be the case that consistency in the quality and standard of provision offered could be developed at Ysgol Rhydygors</b>

Response to Option4 query: Please refer to information in the document regarding issues around securing leadership and continuity at the school and the need for the Local Authority to place an interim seconded leadership into the school.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
5	Discontinue Ysgol Rhydygors and provide no alternative provision.	Does not cater for the needs of pupils with SEBD in Carmarthen.	No comment made from ESTYN.

# Consultation with the Pupils

## Children and Young People Consultation Document

A Children and Young People's version of the Consultation Document was provided to the school to distribute to all pupils.

## Pupil Consultation Event

Pupils were provided with the opportunity to meet with the Educational Support Adviser to share their views on the proposal on 11<sup>th</sup> February 2021. However, there was limited interest in engaging in discussion. Despite this, pupils' views were collated by the school and the feedback is summarised below.

During the week of the 8<sup>th</sup>-12<sup>th</sup> February 2021 school staff facilitated a meeting with a range of pupils accessing the school site to consult on the process of change. On the 17<sup>th</sup> the ESA was planned to talk to a select group of pupils on the findings of the whole group. However, 3 out of 4 pupils were absent on that day and 1 pupil who was initially prepared to feed back to the ESA, declined at the last minute.

The ESA engaged with the acting head teacher to discuss the outcomes of the discussion, which are detailed below.

\*All pupils were asked the following questions and 19 pupils engaged with the discussion.

### 1. Do you know there could be changes to your school?

5- Yes	14- No
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### 2. Is there anything you are looking forward/ worried about?

Looking forward	Worried
As part of looking forward pupils were asked to share their positive thoughts. There were a range of responses, including: <ul style="list-style-type: none"><li>• Nothing</li><li>• Don't know</li><li>• More time off site</li><li>• The school closing</li><li>• Leaving school</li></ul>	Pupils who access this setting experience a range of social, emotional, and behavioural difficulties. The responses were: <ul style="list-style-type: none"><li>• Don't like new people/pupils</li><li>• Don't like being off site</li><li>• I like my staff – will they be the same-don't like new staff</li><li>• Will it be the same?</li><li>• What is going to be different?</li></ul>

### 3. What would you like to keep the same?

The setting has a high staff to pupil ratio at present with all pupils having access to key workers whom they trust. Responses again varied. <ul style="list-style-type: none"><li>• Staff – (some staff were named)</li><li>• Small classes</li><li>• School trips</li><li>• Nothing</li></ul>
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#### **4. What would you like to be different?**

Pupils have limited positive experiences and have often missed out on play-based learning from the very start of life. Levels of concentration for formal learning are often underpinned by significant wellbeing needs. The pupils struggle to engage in formal situations as with the consultation process. Staff revisited this question with pupils:

- More play and opportunities to work in a structured way outdoors.
- More practical things to do on and off site, more art, and craft
- More practical activity off site to access more work-type experiences
- A broader range of practical opportunities: Photography, woodwork, animal care on and off site
- Nicer staff
- Moving around and going to different classes like a 'real' school

A few years 10 and 11 pupils added:

- Sixth form
- Staying in school instead of going to college

SNAP Cymru also submitted feedback in relation to consultation with the pupils which provided the same results.

## Alternative Options

During the formal consultation period stakeholders were provided with the opportunity to submit alternative options for consideration. The alternative options (not already considered in the consultation document) received are noted below and will be presented to the Cabinet for consideration.

<b>To move the new PRU provision to a new site</b>	
<b>Advantages</b>	<b>Disadvantages</b>
More appropriate location	Disruption for pupils and staff
Opportunity for re-brand of the setting	Significant capital required
	Appropriate site required
	Land acquisition

<b>To merge all PRUs with investment from 21<sup>st</sup> Century Schools Programme</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Would provide pupils with 21 <sup>st</sup> century facilities	Would require large scale re-organisation
Greater consistency of access to subject specialists	Dependent on business case approval to secure funding
Economies of scale	Disruption for staff and pupils in attendance at PRUs

<b>To retain Ysgol Rhydygors and establish a separate PRU.</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Ysgol Rhydygors remains	Would require additional capital and revenue funding
Lessens disruption for current pupils and staff	Additional land required
Creates additional job opportunities	The current permanent placement does not reflect the inclusive aspiration of the Four Phase Model
	Historically, young people leaving Ysgol Rhydygors have not successfully completed post 16 qualifications

<b>Maintain Ysgol Rhydygors and provide suitable permanent leadership.</b>	
<b>Advantages</b>	<b>Disadvantages</b>
Ysgol Rhydygors remains	Employing and maintaining successful suitable leadership for Ysgol Rhydygors remains a challenge
Lessens disruption for current pupils and staff	Difficulty in identifying and maintaining an experienced Governing Body

	The current permanent placement does not reflect the inclusive aspiration of the Four Phase Model
	Historically, young people leaving Ysgol Rhydygors have not successfully completed post 16 qualifications

<b>Pause the proposal until the Four Phase model of behaviour services has been embedded and there is evidence to support a decline in the requirement for Ysgol Rhydygors' specialist provision</b>	
<b>Advantages</b>	<b>Disadvantages</b>
	PRUs are currently at capacity whereas Ysgol Rhydygors numbers are declining.
	Potential to de-moralise staff by lengthening the uncertainty of the future of the school
	Cannot sustain temporary emergency leadership

# Appendix A

## Four Phase Model Outline



[carmarthenshire.gov.uk](http://carmarthenshire.gov.uk)

Cyngor **Sir Gâr**  
**Carmarthenshire**  
County Council



## PHASE 1: MAINSTREAM SCHOOLS

We promote that all schools develop a restorative ethos and have provided training opportunities for all schools. We have also invested in a pilot project training clusters of schools to all train together to implement and embed restorative approaches in their schools. In addition, we have purchased emotional literacy toolkits for every school in the local authority to enable schools to have a consistent approach to the early identification of specific areas of emotional literacy for learners and have further supported this with training and support from the Behaviour Support Community Team. We have also funded training for every school to have an Emotional Literacy Support Assistant (ELSA) and this provides a supervision model provided by the Education and Child Psychologists (ECPs) for the ELSAs. We have also funded training for anxiety, mental health first aid, resilience and mindfulness. We have also purchased a Wellbeing Toolkit for Teenagers for every secondary school in the Local Authority and provided training and introduction to this toolkit from Tina Rae.

We have several pilots and further training opportunities for the 2021-22 academic year.

Essentially Phase 1 is upskilling and supporting schools to develop and maintain a confident and competent workforce to deliver emotional wellbeing support for learners.

## PHASE 2 – BEHAVIOUR SUPPORT COMMUNITY TEAM

The mid to long term plan is to deliver training across schools so that there is a growing skill set to develop systems to work with pupils with far earlier intervention, have a larger Behaviour Support Community Team to deliver support, training and guidance to their link cluster schools, supporting schools and learners following exclusions, supporting interventions and robust support packages including supporting transition into new settings. The teachers in the team have recently completed the Trauma Informed Practice diploma. We intend to employ L3 teaching assistants to support the team who will all be ELSA trained and will support teaching assistants and other staff to develop strategies and plans to support pupils in school and/or through transition periods.

The team will be able to provide support for bespoke packages of education and wellbeing plans for pupils demonstrating some deregulated and challenging behaviours. In addition, they will be working in an integrated model with Teams Around the Family who will be able to support families who may need support. Using teams that will provide a consistent restorative approach in and outside of school will enable the child to have a consistent message of support.

At Phase 2 a more robust package of support will be delivered, in school, and monitored and evaluated using TAPPAS (Teams Around Pupils, Parents and Settings). The team member will be able to provide evidence and overview of support to add to any conversation and co-construction of plans going forward for longer term support. The team member would also support the learner through transition into a PRU (Phase 3) if this was agreed and would have support to transition back into school when progress was made.

### **PHASE 3 – SPECIALIST SETTINGS**

Learners attending these settings will have access to a broad and balanced curriculum delivered by trauma informed staff. They will have access to bespoke packages of support co-constructed with them and other professionals which will be closely monitored and reviewed, and all progress celebrated. The Specialist Settings will use a trauma recovery model for our deregulated learners and our priority is to ensure the learners feel safe and valued so that they can begin to engage positively and effectively in their learning pathways.

There will always be an aspiration to return learners to a mainstream setting with any plan always focussed on the progress and needs of the individual and working towards their best possible outcomes.

### **PHASE 4 – LONG TERM PLACEMENTS AND POST 16 PATHWAYS**

Phase 4 of the model works with learners and their families who have complex issues and dynamics to work with and will require longer-term input from multi-agency support services. We will be working with learners who require trauma informed work with their families and will require support to engage in post 16 pathways which we will be developing in line with their ability to engage and their vocational aspirations.

# Appendix B

## Four Phase Model of Behaviour Support Services



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# FOUR PHASE MODEL OF BEHAVIOUR SUPPORT SERVICES

