

**Integrated Impact Assessment (IIA) Report**

This form should be completed when a screening form has indicated a full Integrated Impact Assessment is required and found to be relevant to Equality Act 2010, Socio-economic Duty and Well-being of Future Generations (Wales) Act 2015

**Please refer to the 'IIA Report Form Guidance' while completing this form. If you need further support, please contact [accesstoservices@swansea.gov.uk](mailto:accesstoservices@swansea.gov.uk).**

**Which service area and directorate are you from?**

Service Area: Vulnerable Learners Service

Directorate: Education

**Q1(a) What are you assessing?**

- New and revised policies, practices or procedures
- Service review, re-organisation or service changes/reductions, which affect the wider community, service users and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year and strategic financial planning
- New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings, moving to on-line services, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Services Boards which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other

**(b) Please name and fully describe initiative here:**

### **New Service Delivery Model for learners requiring education other than at school (EOTAS)**

To address the gaps in the current provision for vulnerable learners in Swansea and use available resources more equitably to meet the needs of all learners requiring education otherwise than at school (EOTAS) a new operating model for Maes Derw PRU is being proposed which will result in a review and restructure the internal organisation. This will enable the resource to be used more flexibility and to extend access to the resource. Reviewing and resetting the existing resource is intended to increase flexibility and widen access. This should enhance learner wellbeing by ensuring provision is better suited to emerging need.

The key changes are as follows:

- the existing primary phase and halfway house merge to form a single PRU, operating on a reintegration model for learners in primary and lower secondary (up to Year 8);
- the provision for learners with Social and Emotional Mental Health needs remains but operates on a more flexible, bespoke, intervention model allowing for earlier and more flexible bespoke package to be developed for learners some of which will be offered on an outreach basis;
- the provisions for secondary learners will be merged to one provision catering for Years 8/9 upwards and operate on a flexible, bespoke, intervention basis. There will be full time places available but there will also be bespoke, multi-agency outreach packages too;
- the options available to the EOTAS panel will be expanded and schools will be encouraged to refer earlier for preventative interventions to avoid escalation to longer term or full-time placements. Registration at Maes Derw will not necessarily be needed to access preventative interventions;
- a special school 'spoke' provision will be established in the Maes Derw building to cater for a small number of learners with a long-term additional learning need who require specialist teaching but access to the resources of a PRU.

For additional consideration the Vulnerable Learners Service are already working closely with colleague in Child and Family Services, specifically, but not exclusively, Youth Justice Service and CMET to develop bespoke packages of support for learners. The new proposed model would formalise this and secure multi agency approaches.

In response to the comments in the consultation relating to the need to improve outdoor spaces and to increase vocational options an amount of ALN capital grant money has been allocated to the Maes Derw site to develop the outdoor space and vocational options.

If agreed, the new model will lead to a review of the staffing structure to ensure it is operationally deliverable and this will be subject to further consultation.

(c) **Will this initiative result in any changes needed to the external or internal website?**

**Yes**       **No**      **If yes, please provide details below**

The website reflects the current provision offer and so it will need to be updated to reflect the change to the existing offer.

(d) **It was initially screened for relevance on: 8/05/2023**

(e) **Lead Officer (Head of Service)**

**Name:** Kate Phillips

**Job title:** Head of Vulnerable Learners

**Date:** 3 November 2023

(e) **Approved by Director of Education**

**Name:** Helen-Morgan-Rees

**Job title:** Director of Education

**Date:** 29 November 2023

## **Section 1 - Aims**

### **What are the aims of the initiative?**

- To improve access to EOTAS service for vulnerable learners
- To improve EOTAS services to secure better outcomes for all learners accessing EOTAS provision
- To restructure the PRU to make the most efficient use of the resources available
- To ensure that the model is future proofed and affordable in line with the medium-term financial plan

### **Who has responsibility?**

Head of Vulnerable Learners Services.

### **Who are the stakeholders?**

Maes Derw Management Committee

Maes Derw staff

Maes Derw leaders

Maes Derw learners

Other learners in receipt of EOTAS provision.

## Section 2 - Information about Service Users (See guidance)

In order to complete this section you will need to look to data such as Census data, research and performance management information, surveys, future trends, service user data, socio-economic data from recent consultations, engagement and research

- |                                     |                                     |                                       |                                     |
|-------------------------------------|-------------------------------------|---------------------------------------|-------------------------------------|
| Children/young people (0-18).....   | <input checked="" type="checkbox"/> | Sexual orientation.....               | <input type="checkbox"/>            |
| Older people (50+) .....            | <input type="checkbox"/>            | Gender reassignment.....              | <input type="checkbox"/>            |
| Any other age group.....            | <input type="checkbox"/>            | Welsh language.....                   | <input checked="" type="checkbox"/> |
| Future generations (yet to be born) | <input type="checkbox"/>            | Poverty/social exclusion .....        | <input checked="" type="checkbox"/> |
| Disability.....                     | <input checked="" type="checkbox"/> | Carers (including young carers) ..... | <input type="checkbox"/>            |
| Race (including refugees) .....     | <input type="checkbox"/>            | Community cohesion.....               | <input type="checkbox"/>            |
| Asylum seekers.....                 | <input type="checkbox"/>            | Marriage & civil partnership.....     | <input type="checkbox"/>            |
| Gypsies & Travellers .....          | <input type="checkbox"/>            | Pregnancy and maternity.....          | <input type="checkbox"/>            |
| Religion or (non-)belief.....       | <input type="checkbox"/>            |                                       |                                     |
| Sex.....                            | <input checked="" type="checkbox"/> |                                       |                                     |

**Please provide details of the information you hold in relation to the groups above:**

- We hold data on current users from our annual school census which can be accessed via the links below:
- [Educated other than at school \(EOTAS\) \(gov.wales\)](#)
- [Absenteeism \(gov.wales\)](#)
- [Counselling for children and young people \(gov.wales\)](#)
- [Exclusions \(gov.wales\)](#)
- We have also considered data from the Local Health Board (this data was shared by the Health Board for internal use only and Swansea Council are not the data controller and therefore not able to share it.
- We have data on attendance and exclusion rates via [My Local School - Search for a school \(gov.wales\)](#). These data sets are extensive and can be sourced via the weblink

We have considered all of the data sources and it has indicated the following:

- There is an increasing trajectory for different areas of need across the spectrum including Autism, speech and language and moderate learning difficulties.
- Our current data for early years (0 – 3) indicates exponential growth in these areas and we know from our school census data that there is a correlation between these additional learning needs and social emotional behavioural difficulties which may in turn require EOTAS provision.
- The current model struggles to manage current numbers, it would definitely not manage future projected levels of demand.
- We also know that there are long waiting lists for children to receive diagnosis on the neurodevelopmental pathway (Autism and ADHD). These children and young people are in schools without a clinical diagnosis but require specialist support and sometimes EOTAS provision. We must respond to need, not diagnosis and develop flexible, responsive provision.

**Any actions required, e.g. to fill information gaps (write below and add to action plan)?**

We have sufficient information in our existing data sets and the data provided by our stakeholders. In addition, we have also undertaken a consultation exercise with stakeholders which has filled any gaps e.g. learners voice.

### Section 3 – Assessing the Impact (See guidance)

Please consider the possible impact on the different protected characteristics and statutory considerations:

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) <b>Consider:</b>
<b>Race</b>	Extended access to provision for all learners and potential to ensure offers are bespoke to learners needs. For learners from different nationalities, ethnic backgrounds or diverse community groups there would be greater access to appropriate services.	positive	Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Refugee / Asylum Seekers Migrants Awareness events <a href="#">United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)</a>
<b>Disability</b>	The establishment of a specialist teaching provision as a spoke of our special school will have a high positive impact on learners with additional needs who require EOTAS provision specifically for those with Autism or ADHD.	positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities Access to communication methods Dietary requirements Other Long Term Health Conditions <a href="#">United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)</a>

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) <b>Consider:</b>
<b>Carers</b>	Any young carer requiring EOTAS provision would benefit from the improved offer	Positive	Providing unpaid and informal care A child caring for a disabled parent An older person caring for a friend who has a mental health issue A young adult caring for a sibling with substance misuse difficulties An adult caring for an older relative who is elderly, frail or experiencing dementia
<b>Sex</b>	Impact will be positive for boys and girls as well as staff because the improvements are intended to ensure every individual is supported to reach their potential.	Positive	Men / Women Gender Identity Childcare Gender Pay Gap Domestic abuse <a href="#">United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)</a>
<b>Age</b>	Improving provision would enable the authority to better meet the needs of more pupils in local provision. Pupils could be offered places at the revised provision, as opposed to provision in the independent sector or out of county. Remaining in their home city would allow them to be closer to their families and wider support network.	Positive	Older People including citizens with dementia. Could the initiative contribute to the 'age friendly' agenda or improve the experience of getting older in Swansea Children, Young People Cross-generational working offers a wide variety of benefits Working Age People, Young Families Demographics NB: Where children / young people are affected complete the <a href="#">Childrens Rights Checklist</a> <a href="#">United Nations Convention on the Rights of the Child (UNCRC)</a> Caring responsibilities
<b>Future generations (yet to be born)</b>	These proposals are about future proofing EOTAS services and meeting the predicted demand from future generations.	Positive	We must ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
<b>Religion &amp; Belief</b>	These proposals will secure the strong offer around Relationships and Sexuality Education (RSE) Wales which is available in Maes Derw. The RSE offer positively promotes respect and value in all communities and supports individuals from all religions and beliefs to have their views respected and supported. This is done via the curriculum taught. The new model makes this curriculum more accessible to more learners and therefore increases positive impact on this group.	Positive	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs Dress code/uniforms Religious festivals/activities, agile working
<b>Sexual Orientation</b>	These proposals will secure the strong offer around Relationships and Sexuality Education (RSE) Wales which is available in Maes Derw. The RSE offer positively promotes respect and value in all communities and supports individuals from all sexual orientations to have their identity respected and supported. This is done via the curriculum taught. The new model makes this curriculum more accessible to more learners and therefore increases positive impact on this group.	Positive	Gay Lesbian Bi-sexual Heterosexual Terminology Confidentiality about sexuality <a href="https://www.stonewall.org.uk/">https://www.stonewall.org.uk/</a>
<b>Gender Reassignment</b>	These proposals will secure the strong support for learners in relation to their gender identity which is already in place at Maes Derw. The setting would also follow the Transgender Guidance once issued by the Welsh Government.	Positive	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, ie, appropriate pronouns



	<b>Potential Impacts</b>	<b>Positive / Negative/Neutral Impact/Needs further investigation</b>	<b>Prompts</b> (not an exhaustive list) <b>Consider:</b>
<b>Marriage &amp; Civil Partnership</b>	These services are for children and young people who are below the age of 16 and so this does not apply	Neutral	Marital status Civil Partnership status
<b>Pregnancy &amp; Maternity</b>	These proposals will secure the strong offer around Relationships and Sexuality Education (RSE) Wales which is available in Maes Derw This is done via the curriculum which promotes respect and values families and parenting by recognising the differences in family structures and supports all, including young parents.	Positive	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers
<b>Welsh Language</b>	This proposal has the potential to expand the Welsh language offer for learners requiring EOTAS services because there will be more flexibility and greater opportunities for schools with a Welsh language offer to contribute to the provision. The current offer is in need of improvement in this area so these are positive changes	Positive.	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) <b>Consider:</b>
<b>Socio Economic Considerations</b>	These proposals improve the education offer for children and young people requiring EOTAS provision by expanding the offer to include more vocational opportunities thus improving their chances of employability	Positive	People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. The impact on limited incomes are significant but also consideration needs to be given to service accessibility and barriers to participation. 'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups.
<b>Human Rights</b>	These proposals support many Human Rights most notably: <ul style="list-style-type: none"> <li>• Protocol 1, Article 2: Right to education</li> </ul>	Positive	See <a href="#">Human Rights Articles</a> .
<b>Intersectionality</b>	These proposals will secure the strong offer around Relationships and Sexuality Education Wales which is available in Maes Derw. The Relationships and Sexuality curriculum is critical to developing healthy, inclusive and supportive communities. It is about promoting respect and tolerance. It identifies all individuals as being valuable and therefore reduces inequalities and challenges power structures. The new model makes this curriculum more accessible to more learners and therefore increases positive impact on this group.	Positive	The way in which power structures based on factors such as gender, race, sexuality, disability etc. interact with each other and create inequalities, discrimination and oppression. (the multiple layers of discrimination)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) <b>Consider:</b>
<b>Community Cohesion</b>	The strong multi agency links proposed and focus on improving behaviour, relationships and life chances aim to improve community cohesion	Positive	Think about relationship between people from different backgrounds, community tensions, community facilities  <a href="http://gov.wales/topics/people-and-communities/communities/communitycohesion/?lang=en">http://gov.wales/topics/people-and-communities/communities/communitycohesion/?lang=en</a>
<b>Other (please state)</b>			Eg, Modern Slavery, Safeguarding, Other Covid effects, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless

<p><b>Human Rights Act 1998</b></p> <ul style="list-style-type: none"> <li>• Article 2 Right to life</li> <li>• Article 3 Freedom from torture and inhuman or degrading treatment</li> <li>• Article 4 Freedom from Slavery and forced labour</li> <li>• Article 5 Right to liberty and security</li> <li>• Article 6 Right to a fair trial</li> <li>• Article 7 No punishment without law</li> <li>• Article 8 Respect for private life, family, home and correspondence</li> <li>• Article 9 Freedom of thought, belief and religion</li> </ul>	<ul style="list-style-type: none"> <li>• Article 10 Freedom of expression</li> <li>• Article 11 Freedom of Assembly and association</li> <li>• Article 12 Right to marry and start a family</li> <li>• Article 13 Right to access effective remedy if rights are violated</li> <li>• Article 14 Protection from discrimination</li> <li>• Protocol 1, Article 1: Right to a peaceful enjoyment of your property</li> <li>• Protocol 1, Article 2: Right to education</li> <li>• Protocol 1, Article 3: Right to participate in free elections</li> <li>• Protocol 13, Article 1: Abolition of the death penalty</li> </ul>
---	--

**If you have identified any areas which need further investigation, these will need to be added to your action plan**

#### **Section 4 - Involvement**

**Please consider all of your involvement activities here, e.g. participation, consultation, engagement, co-productive approaches, etc.**

**What involvement has been undertaken to support your view? How did you ensure this was accessible to all?**

There has been a 12-week consultation period with stakeholders using a range of methods, including personal engagement with support

workers, to ensure all were able to access the consultation and provide feedback. There have been:

- Meetings
- Workshops
- Focus groups
- Questionnaires (paper and online)
- Presentations
- Discussions

### **What did your involvement activities tell you? What feedback have you received?**

A full analysis of the findings has been compiled and assessed.

The findings of the consultation exercise have been grouped into themes with feedback from across all groups included within each theme. The first theme considers what **works well** across all consultation groups the following we identified as strengths:

- small classes / groups / settings were considered successful and beneficial across all consultation groups.
- interventions were also a positive theme from all contributors.
- relationships between staff and pupils were a strength when they worked well.
- staff resilience was considered as strong.
- Teamwork with current staff emerged as a strength.
- assistant headteachers are considered highly effective.
- Tŷ Glas (provision for learners with Social, Emotional and Mental Health) is considered highly effective by stakeholders.
- support workers were considered to be a valuable resource.
- bespoke timetables were identified as an important element of the work.

These are elements it is considered important to retain in the new model and in some cases further develop and embed.

The second theme considers what **doesn't work well**:

- Most learner comments relating to subjects on offer identified a lack of choice.
- A minority of learners identified that relationships with some staff was difficult although this needs to be considered within context.
- The majority of learners commented they did not like the catering offer and that the food was disappointing.
- A small number of learners identified that the centre could be noisy and that the mix of learners was sometimes difficult. Some staff also identified that the mix of different learner needs within groups was challenging to manage.
- A small number of learners identified there could be better understanding of mental health issues from some staff.
- Learner behaviour was identified as something staff found challenging.
- A lack of good outdoor space was identified by a high number of both staff and learners with a number of suggestions for potential improvements e.g. gym or football space.
- Staff retention and a lack of consistency in staffing was identified as an issue.
- It was identified by staff that more external and multi-agency support is needed and would be welcomed.
- A number of staff commented they felt the curriculum offer could be more bespoke to learners and this was also reflected in some of the learners' comments.

All consultation groups were asked to make **suggestions for improvement** and the following themes were identified:

- There was a clear theme around the need to develop more vocational experiences and vocational qualification options.
- It was identified that learner wellbeing should be prioritised over curriculum and there should be less emphasis on academic results with progression and individual achievement being prioritised.
- An even more bespoke approach was seen as beneficial.
- Better/improved outdoor spaces are needed and more vocational learning resources/spaces e.g. barbering/hairdressing or construction.
- A need for involvement and commitment from mainstream schools was identified which could be enhanced by facilitating more options for referrals for earlier interventions and greater opportunities for reintegration if access to places was available earlier and more flexibly.
- Identifying appropriate settings for learners with Autism or long-term additional learning needs was considered important. Making changes to allow for the differing needs of all learners to be met was a key theme.
- Developing Trauma Informed approaches was suggested in responses, as was developing consistency in staff approaches to learners.
- Developing greater opportunities to engage with other agencies and services was also considered important alongside securing commitment from other agencies. It was noted that many children and young people needed support beyond what a single provision could offer.
- It was also noted that the roles of the assistant headteachers were very broad in terms of responsibility and that the current staffing structure does not offer many opportunities for staff progression and professional development.

## How have you changed your initiative as a result?

The consultation activity was intended to help shape the proposals and so the proposed model is a direct result of the consultation activity.

**Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.)? (Add to action plan)**

## Section 5 – Duties (please see guidance)

**Please consider how the initiative might address the following issues. How will the initiative impact on the duties set out below?**

**Think about what work you have already done to improve the outcomes.**

<b>Public Sector Duty – how will the initiative address the below?</b>	
Foster good relations between different groups	The review of provision will allow the wider support network for children and young people accessing EOTAS provision with multi agency work planned to support fostering good relationships.
Elimination of discrimination, harassment and victimisation	This would mean that less families have to seek a specialist provision outside of the borders of the city and county of Swansea. A number of projects are in place already to provide support work for young people and their families in relation to anti racism. The Education Welfare service provides advice and guidance on issues relating to bullying and any links to non-attendance. Peer-on-Peer bullying and harassment is a key workstream within the new Inclusion Strategy which links to the work of Maes Derw. LGBT support is provided by the YMCA and Stonewall Cymru through a commissioned contract. Prevent training and an online resource is made available.
Advance equality of opportunity between different groups	These proposals will provide greater access to EOTAS provision for more children and young people. Many workstreams within Education Directorate's work aim to provide equity for learners and this is reflected in the Vulnerable Learners Service Inclusion Strategy. There are many workstreams to provide additional support services for vulnerable learners so they may also access opportunities.
<b>Socio-economic Duty - Describe any issues identified as a result of the initiative for those people experiencing and living in poverty</b>	
a) Communities of place	It is considered that these proposals will improve opportunities and life chances thus contributing positively to communities of place.

b) Communities of interest	The LA recognises that in Swansea, the effects of poverty on pupils can be profound and pupil referral units, such as Maes Derw, work within challenging contexts. Teachers and leaders are often required to develop specific ways of working to mitigate against the risks of disaffection and disengagement of pupils. Effective use of the Pupil Development Grant is key and this is already in place in Maes Derw
----------------------------	---

**How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011)? (beyond providing services bilingually)**

a) To ensure the Welsh language is not treated less favourably than the English language	The local authority will continue to make reasonable adjustments within EOTAS provision to ensure that pupils are able to access their education through the medium of Welsh. The reviewed provision is designed flexibly so that it can facilitate the provision of Welsh language requirements when required.
b) That every opportunity is taken to promote the Welsh language	The new proposal is not proposed to be a Welsh-medium provision, however Welsh heritage and linguistic identity is a strong feature of the Curriculum for Wales in our schools and across our EOTAS provision
c) Increase opportunities to use and learn the language in the community	Support for the use of Welsh outside the classroom will be an integral part of strategic planning.

**United Nations Convention on the Rights of the Child (UNCRC): Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests**

**Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)?**

There will be a positive impact on children and young people as the LA will be improving EOTAS provision with all the benefits outlined above which should also reduce the need for pupils to be placed in specialist provision outside of Swansea.

**All initiatives must be designed / planned in the best interests of children and young people.**

*Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.*

**Please explain how you meet this requirement:**

The initiative is planned to enhance and increase flexibility in our EOTAS offer for children and young people thus providing the best opportunity to achieve to their full potential locally. The proposal relates to

the following articles:

Article 3 - All organisations concerned with children should work towards what is best for each child.

Article 12 - Respect for the views of the child

Article 18 - Both parents share responsibility for bringing up their children. We should help parents by providing services to support them.

Article 23 - Disabled children have the right to enjoy a full life, with dignity, and to participate as far as possible in their community. The government should support disabled children and their families

Article 28 - Children have a right to an education. Discipline in schools should respect children's human dignity.

Article 29 - Education should develop each child's personality and talents to the full.

Article 30 - Children have a right to learn and use the language and customs of their families.



## Section 6 - Sustainable Development

The Well-being of Future Generations Act (Wales) 2015 places a well-being duty on Swansea Council to carry out sustainable development. This is in line with the Council's Sustainable Development Policy and our Corporate Plan's Well-being Objectives. We must work in a way that improves the economic, social, environmental and cultural well-being of Wales, by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

The sustainable development principle means we must act in a manner, which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. We do this by applying the five ways of working.

### 6a) The Sustainable Development Principle's Ways of Working

The Five Ways of Working	Examples or summary of how applied
<p><b>Long term</b> - The importance of balancing short-term needs while safeguarding the ability to also meet long-term needs</p>	<p>Flexible provision            Long term provision to meet identified need and demand            Sustainable building &amp; community use            Parents, families, learners in LA where appropriate            ALNET Act.            Linking to local and national strategies - including WESP            Proposal addresses business continuity risks in terms of options which if not acted upon could impact on standards of education and or lead to increased tribunals            Pre- redesign questionnaires and pupil and staff engagement.</p>
<p><b>Prevention</b> - Acting to prevent problems occurring or getting worse</p>	<p>Flexing existing services to expand the offer and meet the needs of more children and young people.            Working with Pupil Engagement Team, ALN Team and Child and to establish the ongoing need.            Liaise with internal departments such as Legal Services            Measurable benefits identified and agreed by key stakeholders            Determine need for additional services, ALN, flexible use            Implications of not acting will result in impact on pupils wellbeing, opportunities, risk of tribunals etc, risk of not being able to meet the needs of vulnerable learners and families            Maximise resources            Links with regional colleagues, cross boarder collaboration            Reducing LAC &amp; NEET</p>

<p><b>Integration</b> -Considering impacts upon each of the well-being goals, well-being objectives, local well-being objectives, or on the objectives of other public bodies</p>	<p>Consideration of the Council corporate aims and objectives  Joint working with Health, Social Services, Education  Opportunity to support transformation agenda, standards,  Changes in curriculum  Working with other teams and schools, providing opportunities for outreach, shared good practice EIA/IIA  Considered and evaluate the impact on schools  Considered and evaluate the impact on local services e.g Child and Family Services</p>
<p><b>Collaboration</b> - Acting together with other services or external organisation towards our well-being objectives</p>	<p>Working with the Pupil Support Team, Capital Team, Additional Learning Needs and Inclusion Team, Social Services and Health  Ensure project links to the Vulnerable Learners Services Inclusion Strategy and council priorities Stakeholder engagement during engagement period included staff, learners, families  Engagement with schools planned.</p>
<p><b>Involvement</b> - Involving people with an interest in achieving the well-being goals (everybody), and ensuring that those people reflect the diversity of the area served</p>	<p>Working with the Pupil Support Team, Additional Learning Needs and Inclusion Team, Social Services and Health achieving the well-being goals (everybody), and ensuring that those people reflect the diversity of the area served  Liaising with other partners including Social Services, Health  Engagement period process carried out with all key stakeholders and further liaison with schools planned.  Swansea Cabinet updated regularly.</p>

**6b) Contribution to Swansea Council's Well-being Objectives**

Our Corporate Plan's Well-being objectives	Are directly supported by this initiative	Are not directly impacted by this initiative	May be in conflict or adversely impacted by this initiative
Safeguarding People from harm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improving Education and Skills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tackling Poverty	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transforming our economy and infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Maintaining and enhancing Swansea's natural	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

resources and biodiversity			
Transformation and Future Council development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**6c) Thinking about your answers above, does the initiative support our Corporate Plan’s Well-being Objectives when considered together?**

**Please consider the positives and negatives as a whole. This is an opportunity to analyse the global impact of the proposal where some objectives will be advanced whilst others may be impacted. Where there is a residual negative impact for one or more objectives please show that we have considered mitigation to ensure that negative impacts are lessened. Please detail any conflicts gaps and mitigation measures.**

The proposal supports all of the Council’s wellbeing objectives. Firstly, the reviewed structure strengthens our ability to safeguarding people from harm, particularly in relation to vulnerable learners who will have greater opportunities to access safeguarding support services. We will also be able to improve education and skills by broadening the EOTAS offer so that those who are not able to attend school can be supported to gain the skills and qualifications they need to succeed in life. This in turn will support transforming our economy and infrastructure by ensuring we have citizens who can work within the local economy and this in turn helps to tackle poverty and enable communities. **6d) How is contribution to the National Well-being Goals maximised? Where can you add value? Consider the full goal description not just the title.** Consider relevant [Journey Checkers](#). Complete the table below

Well-being Goal (click to view definition)	Primary Goals - tick if key	Any significant positive and/or negative impacts/contributions considered/mitigated
---	-----------------------------	---

<p><a href="#">A Prosperous Wales:</a> An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Transform the EOTAS provision to meet demand</li> <li>• Improve outcomes for LAC children with specific ALN and families</li> <li>• Improve education and skills for pupils with social emotional behavioural difficulties (SEBD) and ALN</li> <li>• Responding to change in learner requirements in relation to both SEBD and ALN. i.e. where this is a current and projected need.</li> <li>• Addresses the need to implement ALNET Act changes to curriculum and requirements for ALN (flexibility)</li> <li>• Long term provision to meet current and projected demand</li> <li>• Shared use of assets, maximising use of Maes Derw building and flexibility of asset</li> <li>• Pupils can access EOTAS provision within their LA allowing families to stay together</li> <li>• Encourage sustainable transport via travel plans. Less pupils will need to be transported out of county</li> </ul>
<p><a href="#">A Resilient Wales:</a> A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Reviewing the use of Maes Derw building ensuring best use of resources.</li> <li>• Provide a service that is sustainable and fit for the future</li> <li>• Development of outdoor learning areas maximise educational opportunities (habitat, growing, healthier choices)</li> <li>• Flexible design</li> <li>• Parents, families, learners stay in LA where appropriate</li> <li>• Implications of not acting will result in impact on pupils wellbeing, travel, opportunities, LAC risk of tribunals etc., risk of not being able to meet the needs of vulnerable learners and families</li> <li>• Maximise resources</li> <li>• Need to link with regional colleagues, cross border collaboration</li> <li>• Reducing LAC &amp; NEET with ALN</li> </ul>

<p><a href="#">A Healthier Wales</a>  A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Responding to change in communities and upturn in ASD , provide a service that is sustainable and fit for the future</li> <li>• Development of outdoor learning areas maximise educational opportunities (healthier choices)</li> <li>• Supports improved opportunities for pupil attainment in schools through improved EOTAS learning environments</li> <li>• Improve social, cultural and environmental wellbeing of pupils with SEBD</li> <li>• Reduce social isolation</li> <li>• Improve education and skills for pupils with SEBD by meeting needs within LA where possible with suitable learning options</li> <li>• Provide timely and effective support within LA where possible</li> <li>• Supports enterprise opportunities for pupils</li> <li>• Working with the wider Vulnerable Learners Service to establish the needs and promote inclusivity</li> <li>• Joint working with Social Services and Education</li> <li>• Opportunity to support transformation agenda, standards, changes in curriculum <ul style="list-style-type: none"> <li>• bespoke services / physical environment within the building will allow for better sports and general activities for pupils, supporting wellbeing</li> </ul> </li> </ul>
<p><a href="#">A More Equal Wales</a>  A society that enables people to fulfil their potential no matter what their background or circumstances.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Working with the ALN team to establish the needs</li> <li>• Consultation and engagement process carried out</li> <li>• Learners can access a more flexible offer</li> <li>• Reduce social isolation through increased community use</li> <li>• Inclusive for community and families</li> <li>• Distribute knowledge of expertise of staff with other schools via outreach approaches</li> <li>• Enables pupils with effective use of curriculum and enterprise opportunities leads to pupils fulfilling potential</li> <li>• Access to appropriate outdoor areas and green space</li> <li>• More pupils remain in the local authority so more opportunities to participate in Swansea community</li> </ul>

<p><a href="#">A Wales of Cohesive Communities</a>          Attractive, viable, safe and well-connected communities.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Shared use of assets, maximising Maes Derw building and flexibility of asset</li> <li>• Engagement activity carried out</li> <li>• Insurance requirements adhered to</li> <li>• Commissioning and procurement activity planned for</li> <li>• Reduce social isolation through increased use</li> <li>• Enterprise opportunities</li> <li>• Community of vulnerable learners where appropriate services are provided, curriculum opportunities</li> <li>• Bolster connection of networks and develop resilience</li> <li>• Active travel opportunities to be considered</li> <li>• Multi agency working and access to building</li> <li>• More pupils remain in the local authority so more opportunities to participate in Swansea community</li> </ul>
<p><a href="#">A Wales of Vibrant Culture &amp; Thriving Welsh Language</a>          A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Further opportunities for arts, sports, enterprise opportunities, social skills, etc.</li> <li>• Improvements in pupils attainment and wellbeing</li> <li>• The 10-year WESP has a clear aim to increase the use of the Welsh language for both learners and school staff. The curriculum supports engagement with Welsh and local culture.</li> <li>• The Welsh in Education Team support schools with training and resources to improve and increase the use of Welsh in schools.</li> <li>• Equality of opportunity</li> <li>• The project will be consistent with the aims of the WESP</li> </ul>
<p><a href="#">A Globally Responsible Wales</a>          A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Collaboration with ALN teams and Child and Family Services.</li> <li>• Maes Derw to work with partners in colleges, schools, other agencies and third sector</li> <li>• Secondment opportunities</li> <li>• Consideration of corporate objectives</li> <li>• Opportunities to share expertise etc.</li> <li>• design to support outdoor learning opportunities</li> <li>• Stakeholder engagement and consultation process</li> </ul> <p>The above all contribute to improvement in social and cultural wellbeing and thus make a positive contribution.</p>

## Section 7 - Cumulative Impact/Mitigation

**What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the IIA and any other key decisions affecting similar groups/ service users made by the organisation?**

This is considered a wholly positive initiative which will improve services for vulnerable children and young people.

**Any mitigation needed:**

It is important that you record the mitigating actions you will take in developing your final initiative.

Record here what measures or changes you will introduce to the initiative in the final draft, which could:

- reduce or remove any unlawful or negative impact/ disadvantage
- improve equality of opportunity/introduce positive change
- support the Well-being of Future Generations Act (Wales) 2015
- reduce inequalities of outcome resulting from socio-economic disadvantage

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the initiative (add to action plan)

**Section 8 - Monitoring arrangements:** The IIA process is an ongoing one that does not end when the initiative is agreed and implemented. Please outline the monitoring arrangements and/or any additional data collection that will help you monitor any equality impacts, risks, sustainability of your initiative once implemented:

**Monitoring arrangements:**

The initiative will be monitored via the Maes Derw Management Committee, Vulnerable Learners Service Plan and the Vulnerable Learners Inclusion Strategy which has its own action plan.

**Actions (add to action plan):**

## Section 9 – Outcomes:

Having completed sections 1-8, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern

Outcome 2: Adjust the initiative – low level of concern

Outcome 3: Justify the initiative – moderate level of concern

Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

## Section 10 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this IIA report and action plan to the Access to Services Team for feedback and approval – [accesstoservices@swansea.gov.uk](mailto:accesstoservices@swansea.gov.uk)
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the IIA from your Head of Service. The IIA will be published on the Council's website - this is a legal requirement