

Appendix A - 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.

Which service area and directorate are you from?

Service Area: Planning and Resources

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

(b) Please name and fully describe initiative here:

New Build Special School Project

Over the past five years the proportion of pupils with ALN has risen, driving an increasing demand for special school places within Swansea. Special school places in Swansea are running at maximum capacity, and increasing demand for places is projected for the future. The significant demand for places is leading the local authority to have no other option than to place pupils into independent and out-of-county schools. In response to this need, Swansea Council increased the planned places available at Ysgol Pen-y-Bryn in Spring 2021, by utilising a recently vacated Pupil Referral Unit. However, this provided a short-term solution, and a longer term, sustainable and flexible solution is now required to ensure that we continue to provide an excellent education for pupils in the coming years.

Swansea Council, as part of a wider review of specialist teaching provision across the local authority, is proposing the following changes to the current special school provision:

1. Amalgamate Ysgol Pen-y-Bryn and Ysgol Crug Glas from 1 September 2025 in order to facilitate the transition to one school when the build is completed
2. Build a new Special School for 350 pupils at Mynydd Garnllwyd Road which will be ready for occupation in April 2028

Swansea has two special schools (Ysgol Pen-y-Bryn and Ysgol Crug Glas) providing education for a maximum of 250 pupils, aged between 3 and 19 years. In recent years the swelling demand for special school places in Swansea led to an increase in planned places available at Ysgol Pen-y-Bryn in Spring 2021. However, special school places in Swansea are continuing to run at maximum capacity and a further increase in demand for places is projected for the future. A longer term, sustainable solution is now required, without this, the local authority will have no other option than to place pupils into independent and out-of-county schools.

It is proposed to amalgamate Ysgol Pen-y-Bryn and Ysgol Crug Glas from September 2025 on existing sites, following a period of consultation and Statutory Notice. To amalgamate schools the legal procedure requires the closing of the existing two special schools on 31 August 2025 and the establishment of a new special school on 1 September 2025. Also, part of this proposal is for a new purpose built special school to be built to accommodate all pupils on one site, this will increase the number of planned places available (by 100) and it is proposed this building will be occupied by the new special school in April 2028.

School organisation proposals must adhere to the School Organisation Code and the School Standards and Organisation (Wales) Act 2013. A period of consultation must be undertaken with interested parties and relevant information must be provided in a consultation document. The Welsh Government and Estyn must be consulted at this stage of proposal. All views received during the consultation period will be collated into a further report for Cabinet who will then decide if the proposal should move to the next stage – a period of Statutory Notice. Formal objections can be lodged during the Statutory Notice period. If any objections are received, then a local determination will be needed on the outcome of the proposal.

The Authority has successfully amalgamated schools in recent years. The amalgamation of the two special schools will have the following benefits:

- Schools operate as one, sharing best practice and whole school ethos and shared philosophy
- A single set of policies and procedures
- One governing body would be required
- Greater opportunities for staff continuing professional development
- More opportunity to develop staff skill set and best use made of staff expertise for all pupils
- The facilities previously available to two separate schools could be available to all pupils in a combined school
- Economies of scale and the most effective use of resources, with the potential of reducing the number of senior leadership required

New build special school with increased capacity

Ysgol Crug Glas has 55 places for pupils with profound and multiple learning difficulties (PMLD), the school site consists of three blocks ranging in age from 1960s to post 2010. The buildings within this school have been categorised as Condition B. Ysgol Pen-y-Bryn has a total of 195 pupil places, 116 places for pupils with moderate to severe learning difficulties (M/SLD) and 79 places for pupils with severe autism. This school consists of several blocks on three different sites, ranging in age from 1960s to post 2010. The buildings within this school have been categorised as Condition C+.

Having a new purpose-built school on one site will allow the opportunity to increase the number of planned places available in the amalgamated special school. School organisation regulations require a statutory proposal to take place if a special school increases their planned places by more than 10% (or 20 places, whichever is the lesser). It is proposed to increase the number of planned places for the amalgamated school from 250 to 350 places when the school moves to the new site in April 2028. Therefore, a statutory proposal would be needed to add 80 planned places to the school (as 20 of the 100 extra places can be added without a proposal).

Increasing planned places at the amalgamated special school in April 2028 would enable the authority to better meet the needs of more pupils in local provision. Pupils could be offered places in this school as opposed to a provision in the independent sector or out of county, this would also alleviate pressure on mainstream schools and Specialist Teaching Facilities (STFs) that are struggling to cope with the demands of managing pupils with more severe learning difficulties.

Ysgol Pen-y-Bryn currently has a residential unit where some pupils aged 14-19 are offered overnight '24-hour' curriculum. It is not proposed to make any changes to the unit upon amalgamation of the two schools in September 2025 as the unit would continue to operate in its current form. Once the new build school is operational, the offer of '24-hour' curriculum will remain, and pupils aged 14-19 will continue to be identified to attend an overnight provision for 24-hour curriculum. This will continue to be available Monday-Thursday term time only for a maximum of 6 pupils per night (as is currently the case).

Having a purpose-built special school on one site will have the following benefits:

- Increase places available for local pupils with complex and profound additional learning needs
- 21st Century School facilities to meet the needs of pupils with more complex and profound educational needs
- Improved quality of outdoor environment
- Hydro pool facility integrated within the school building
- New facilities with the required resources such as sensory rooms, specialist therapy rooms, therapeutic external learning environments etc.
- More space and better provision for teaching young people life skills and vocational skills
- Flexibility to adapt to changing needs and increased demand
- Improved opportunities for multi-agency working as will no longer have separate school sites
- Schools budget targeted more appropriately and effectively on pupils
- Reduced carbon emissions.

(c) **It was initially screened for relevance on:** EIA screening initially completed in April 2019. Latest update August 2023.

(d) **Lead Officer**

Name: Michelle Thomas

Job title: Team Manager Funding and Information

Date: 16/08/23

(e) **Approved by Head of Service**

Name: Kelly Small

Job title: HOS, Education Planning and Resources

Date: 16/08/23

Section 1 - Aims

What are the aims of the initiative?

Increasing planned places and building a new school on a new site to enable the authority to better meet the needs of more pupils in local provision. Pupils requiring special school places could be offered places at the new build as opposed to provision in the independent sector or out of county, and it would also alleviate pressure on mainstream schools and STFs that are struggling to cope with the demands of managing pupils with more severe learning difficulties.

Who has responsibility?

If approved, the overall responsibility would be with Swansea Council's Education Directorate.

Who are the stakeholders?

Audience	Methods
Pupils	Face to face school visits, formal consultation
Parents	Letters, media, website, formal consultation, face to face
Governors	Face to face briefing, emails, formal consultation
Head and Management Team	Face to face briefing, emails, formal consultation
School Staff	Face to face, letter, Newsletter, media, website, formal consultation
All other schools	Letter, email, newsletter
CMT	Face to face briefing, newsletter, email, formal consultation
Cabinet	Face to face briefing, newsletter, email, formal consultation
Ward Members	Email, formal consultation
Trade Unions	Email, formal consultation
Press/Media	Press release
Welsh Government	Letter, local media, email, formal consultation
Estyn	Formal consultation

AMs/MPs	Formal consultation
Education SLB/EDSLT/DMT	Email, newsletter, face to face, formal consultation
SPP Chairs and V Chairs	Email, letter, formal consultation
Community groups	Formal consultation
All Council staff	Formal consultation
Swansea residents	Media, website, social media formal consultation
Neighbouring Local Authorities	Formal consultation

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 checked="" type="checkbox"/>	Gender reassignment.....	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language.....	<input checked="" type="checkbox"/>
Future generations (yet to be born)	<input checked="" type="checkbox"/>	Poverty/social exclusion	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input checked="" type="checkbox"/>
Race (including refugees)	<input checked="" type="checkbox"/>	Community cohesion.....	<input checked="" 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:

The following information is collated as part of the annual pupil census that is carried out in January of each year. The below is from the January 2023 PLASC:

Number of pupils on roll:

School	N (R3)	N	R	Y 1	Y 2	Y 3	Y 4	Y 5	Y 6	Y 7	Y 8	Y 9	Y1 0	Y1 1	Y1 2	Y1 3	Y1 4	FT E	Full Time	Whole School
TOTAL	0	4	6	4	6	6	5	15	7	28	18	22	24	16	26	26	20	231	229	233
Ysgol Pen-y-bryn	0	0	0	0	3	1	4	9	5	25	17	20	20	15	21	23	17	180	180	180
Ysgol Crug Glas	0	4	6	4	3	5	1	6	2	3	1	2	4	1	5	3	3	51	49	53

% Boys and Girls

School	Boys	Girls	Total	Boys %	Girls%
Penybryn	128	52	180	71.1	28.9
Crug Glas	29	24	53	54.7	45.3
Total	157	76	233	67.4	32.6

	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
Percentage of total pupils on roll living in areas classed in Welsh Index of Multiple Deprivation (WIMD) as being in the most deprived 30% of all areas	Crug Glas 32.7% Penybryn 48.1%	Crug Glas 25.0% Penybryn 49.6%	Crug Glas 30.8% Penybryn 47.9%	Crug Glas 28.3% Penybryn 44.0%	Crug Glas 30.8% Penybryn 47.3%	Crug Glas 25.0% Penybryn 48.9%
Percentage claiming Free School Meals	Crug Glas 35.1% Penybryn 40.2%	Crug Glas 44.7% Penybryn 44.6%	Crug Glas 45.5% Penybryn 41.0%	Crug Glas 40.5% Penybryn 43.4%	Crug Glas 47.1% Penybryn 46.8%	Crug Glas 40.6% Penybryn 47.1%

Percentage with Special Educational Needs (SEN)	100%	100%	100%	100%	100%	100%
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In January 2023 the breakdown for SEN was as follows (NB – pupils can have more than one need):

<i>Crug Glas</i>	School Action	School Action Plus	Statement	School IDP	LA IDP	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	0	0	0	0	0
<i>Autistic Spectrum Disorders</i>	0	0	4	0	0	4
<i>Behavioural, Emotional & Social Difficulties</i>	0	0	0	0	0	0
<i>Dyscalculia</i>	0	0	0	0	0	0
<i>Dyslexia</i>	0	0	0	0	0	0
<i>Dyspraxia</i>	0	0	0	0	0	0
<i>General Learning Difficulties</i>	0	0	0	0	0	0
<i>Hearing Impairment</i>	0	0	0	0	0	0
<i>Moderate Learning Difficulties</i>	0	0	0	0	0	0
<i>Multi-Sensory Impairment</i>	0	0	0	0	0	0
<i>Physical and Medical Difficulties</i>	0	0	17	0	0	17
<i>Profound & Multiple Learning Difficulties</i>	0	0	40	1	4	45
<i>Severe Learning Difficulties</i>	0	0	4	0	0	4
<i>Speech, Language and Communication Difficulties</i>	0	0	1	0	0	1
<i>Visual Impairment</i>	0	0	2	0	0	2
Total	0	0	68	1	4	73

<i>Pen-y-Bryn</i>	School Action	School Action Plus	Statement	School IDP	LA IDP	Total
<i>Attention Deficit Hyperactivity Disorder</i>	0	0	10	0	1	11
<i>Autistic Spectrum Disorders</i>	0	0	112	0	2	114
<i>Behavioural, Emotional & Social Difficulties</i>	0	0	13	0	0	13
<i>Dyscalculia</i>	0	0	0	0	0	0
<i>Dyslexia</i>	0	0	0	0	0	0
<i>Dyspraxia</i>	0	0	1	0	0	1
<i>General Learning Difficulties</i>	0	0	0	0	0	0
<i>Hearing Impairment</i>	0	0	6	0	1	7
<i>Moderate Learning Difficulties</i>	0	0	81	0	0	81
<i>Multi-Sensory Impairment</i>	0	0	3	0	0	3
<i>Physical and Medical Difficulties</i>	0	0	32	0	0	32
<i>Profound & Multiple Learning Difficulties</i>	0	0	4	0	0	4
<i>Severe Learning Difficulties</i>	0	0	39	0	1	40
<i>Speech, Language and Communication Difficulties</i>	0	0	34	0	0	34
<i>Visual Impairment</i>	0	0	5	0	0	5
Total	0	0	340	0	5	345

Ethnic Background

Crug Glas	N1	N2	R	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total
WBRI - White - British	0	4	4	3	2	4	1	3	2	3	1	2	2	1	4	3	3	42
BAOF - Other Black African	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2
MWBA - White and Black African	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2
AIND - Indian	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
ASLT - Sri Lankan Tamil	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
BNGN - Nigerian	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
MWOE - White -And Any Other Ethnic Group	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
OKRD - Kurdish	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1

WHUN - Hungarian	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
WPOL - Polish	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Totals	0	4	6	4	3	5	1	6	2	3	1	2	4	1	5	3	3	53

Pen-y-Bryn	N1	N2	R	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total
WBRI - White - British	0	0	0	0	2	1	2	7	3	20	16	15	18	14	19	19	14	150
ABAN - Bangladeshi	0	0	0	0	0	0	0	1	1	2	0	2	0	1	0	1	1	9
MAOE - Asian And Any Other Ethnic Group	0	0	0	0	0	0	1	0	1	0	0	0	1	0	0	1	0	4
AOPK - Other Pakistani	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	3
MOTM - Other Mixed Background	0	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	3
BNGN - Nigerian	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	2
AIND - Indian	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
BAOF - Other Black African	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
BSOM - Somali	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
MWCH - White And Chinese	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
REFU - Information refused	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
OARA - Arab	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
OIRQ - Iraqi	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
WGRE - Greek/Greek Cypriot	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
WRMA - Romanian	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Totals	0	0	0	0	3	1	4	9	5	25	17	20	20	15	21	23	17	180

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

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
Race	Impact will be positive on minority or ethnic groups as it will be for all learners.	Positive
Disability	<p>The design, delivery and implementation of this project will take full consideration of the social model of disability, which recognises that people are disabled by the barriers of society (e.g. physical, environmental, organisational, and attitudinal, communication, etc.) rather than by any physical condition. The new build and the running of the school would continue to ensure that all pupils can make the most of their improved environment.</p> <p>The school will be designed so that the community and other schools can benefit from the specialist provision. This includes all groups listed in the right-hand column.</p>	Positive
Carers	<p>Parents, carers and families will benefit greatly as a result of the increased provision within the boundaries of the city and county of Swansea reducing the need for out of county provision that can put additional strains on families and carers.</p> <p>As well as providing an education the school will provide a wider support network for these families and carers.</p>	Positive
Sex	Impact will be positive for boys and girls as well as staff.	Positive
Age	(0-18) – Increasing planned places and providing a new school building would enable the authority to better meet the needs of more pupils in local provision. Pupils requiring special school places could be offered places at the new school, as opposed to provision in the	Positive

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation
	<p>independent sector or out of county. Remaining in their home City would allow them to be closer to their families and wider support network.</p> <p>(Older People 50+/Any other age group) – The staff, parents, carers and wider school community will benefit greatly from increasing the number of places and the improved school environment. The school will also cater for pupils up to and including the age of 19.</p>	
Future generations (yet to be born)	The project will ensure that all children and young people born and living in Swansea who require special school provision will have access to a modern learning environment that can deliver nearly all of their needs.	Positive
Religion & Belief	This will be picked up as part of the consultation.	Needs further investigation
Sexual Orientation	This will be picked up as part of the consultation.	Needs further investigation
Gender Reassignment	This will be picked up as part of the consultation.	Needs further investigation
Marriage & Civil Partnership	This will be picked up as part of the consultation.	Needs further investigation
Pregnancy & Maternity	This will be picked up as part of the consultation.	Needs further investigation
Welsh Language	A full Welsh Medium impact Assessment has been undertaken, and the proposal will not have any detrimental impact on the ability of pupils and staff to use and learn the Welsh language.	Neutral

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation
Socio Economic Considerations	<p>Taking Wales Forward (Programme for Government) sets out how this Government will deliver more and better jobs through a stronger, fairer economy, improve and reform our public services, and build a united, connected and sustainable Wales. This project will support this commitment by delivering improved services for pupils requiring special school places in the right environment and within their local authority. The project will also support additional jobs within the local authority as increasing pupil places will require additional staff to support pupils. Keeping pupils local also supports sustainability.</p> <p>Jobs and training opportunities will also be created through the school build.</p> <p>The project will support WGs commitment to tackle child poverty. The 5 Strategic Objectives will be supported by this project.</p> <ol style="list-style-type: none"> 1. To reduce the number of families living in workless households, as children living in workless households are particularly at risk of living in poverty and 2. To increase the skills of parents and young people living in low-income households so they can secure well-paid employment and in-work progression, as in-work poverty is a growing issue – additional jobs will be created throughout the build (including opportunities for those out of work through Beyond Bricks and Mortar) as well as a variety of jobs within the new build school at varying levels of skill. 	Positive

	<p>3. To reduce the inequalities which exist in the health, education and economic outcomes of children and families by improving the outcomes of the poorest. Preventing poverty is fundamental to our long term vision for supporting low income households - Pupils and parents will have access to health and support services in the new school</p> <p>4. To use all available levers to create a strong economy and labour market which supports the tackling poverty agenda and reduces in-work poverty in Wales. – as above there will be opportunities for jobs during the build and on occupation of the new build</p> <p>5. To support families living in poverty to increase their household income through debt and financial advice, action to address the “poverty premium” (where low income households pay disproportionately more for goods and services) and action to mitigate the impacts of welfare reform. - as above there will be opportunities for jobs during the build and on occupation of the new build. Support services will be easier to access on one site.</p>	
Human Rights	<p>In Swansea a Children’s Rights Impact Assessment has been integrated into the legally binding Integrated Impact Assessment, meaning that when services and policies are amended and require an assessment, services making those decisions are required to evidence how they have engaged children and young people, if the decision they are making affects them.</p> <p>The Curriculum for Wales and associated professional standards is underpinned by the United Nations Convention Rights of the Child principles.</p>	Positive
Intersectionality	<p>The rights of disabled school pupils under the 2010 Act relating to disability discrimination in schools are enhanced with this proposal.</p> <p>Wider equalities work is being undertaken to develop an overall Equalities plan for schools. Peer-on-peer bullying and harassment work will be a key feature of the new Inclusion Strategy. The Vulnerability Assessment Profile (VAP) is a tool that provides data to inform LA and school support for vulnerable learners.</p> <p>Work with schools to focus on all areas of equalities.</p>	Positive
Community Cohesion	<p>These fully accessible and ALN specific facilities will be available for the wider pupil population and the population of Swansea and further afield. The design is likely to include a community café and it is hoped that this will facilitate community resilience and support tackling poverty. If pupils and adults have suitable and accessible facilities near by this can reduce the need for travel and also utilise facilities they may not have otherwise.</p> <p>ALN and DDA compliant facilities including hydrotherapy pool, rebound rooms will be available for community use, along with the accessible / wheel chair friendly external areas (All Weather Pitch and MUGA for example). General rooms and the hall will also be available for community use. These will be subject to booking and letting arrangements within the council.</p>	Positive

Other (please state)		
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<p>Human Rights Act 1998</p> <ul style="list-style-type: none"> • Article 2 Right to life • Article 3 Freedom from torture and inhuman or degrading treatment • Article 4 Freedom from Slavery and forced labour • Article 5 Right to liberty and security • Article 6 Right to a fair trial • Article 7 No punishment without law 		<ul style="list-style-type: none"> • Article 8 Respect for private life, family, home and correspondence • Article 9 Freedom of thought, belief and religion • Article 10 Freedom of expression • Article 11 Freedom of Assembly and association • Article 12 Right to marry and start a family • Article 13 Right to access effective remedy if rights are violated • Article 14 Protection from discrimination
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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?

A full statutory consultation will be delivered as part of this project giving all stakeholders and opportunity to share their views and shape the design and delivery of the project.

The current special schools have been involved in the shaping of the project to date and will continue to play a full and active role throughout the life of the project. Numerous internal partners including Child and Family Services, Building Services and Social Services are all key partners that are key stakeholders and involved in the project.

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

Various workshops with key stakeholders helped determine the scope and service solution for the project to date. This section will be further updated after the statutory consultation.

How have you changed your initiative as a result?

Various workshops with key stakeholders helped determine the scope and service solution for the project to date. This section will be further updated after the statutory consultation.

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

Statutory consultation to be held.

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.

Public Sector Duty – how will the initiative address the below?	
Foster good relations between different groups	This increase to the provision and new school build would allow the wider support network of families to grow by bringing them in as part of the special school family within the city and county of Swansea. Wider equalities work is being undertaken to develop an overall Equalities plan for schools. The new curriculum will support mutual respect, tolerance and citizenship.
Elimination of discrimination, harassment and victimisation	<ul style="list-style-type: none"> • This would mean that less families have to seek a specialist provision outside of the borders of the city and county of Swansea. • EYST are commissioned to provide support work for young people and their families from Black, Minority, Ethnic through the WG Families First Programme. • Show Racism the Red Card is commissioned to provide awareness raising sessions in schools. • 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 that will be published shortly. • LGBT support is provided by the YMCA and Stonewall Cymru through a commissioned contract.

	<ul style="list-style-type: none"> The majority of schools have undertaken Prevent training and an online resource is made available.
Advance equality of opportunity between different groups	This would provide greater access to a local school for more local families. Many workstreams within Education's work aim to provide equity for learners. There are many workstreams to provide additional support services for vulnerable learners so they may also access opportunities.
Socio-economic Duty - Describe any issues identified as a result of the initiative for those people experiencing and living in poverty	
a) Communities of place	The duty will not apply to schools. School Governing Bodies are created by section 19 of the Education Act 2002 and are statutory corporations. They therefore have a distinct legal identity from Local Authorities.
b) Communities of interest	The LA recognises that in Swansea, the effects of poverty on pupils can be profound and in schools with 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. The LA will work with schools to support reduction of the impact of poverty for learners in Education.
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	<p>The local authority will continue to make reasonable adjustments within specialist provision to ensure that pupils are able to access their education in the medium of Welsh. Currently, where this is not possible the local authority will seek to secure Welsh medium specialist placements from neighbouring authorities.</p> <p>The new build will be designed flexibly so that it can facilitate the provision of a Welsh medium unit if required and support the linguistic continuum.</p>
b) That every opportunity is taken to promote the Welsh language	The new special school build is not proposed to be a Welsh medium school, however Welsh heritage and linguistic identity is a strong feature of the curriculum for Wales in our schools.
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 providing placements for special schools in a new purpose-built facility with all the benefits outlined above which should also reduce the need for pupils to be placed in specialist provision outside of the city and county 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 increase the number of places available in our local specialist provision and deliver that provision in a new purpose built environment thus giving children and young people the best opportunity of achieving 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>Long term - The importance of balancing short-term needs while safeguarding the ability to also meet long-term needs</p>	<p>Building Bulletin (BB104) guidelines Use of existing assets where possible. Flexible design Long term provision to meet identified need and demand Sustainable building & community use Parents, families, learners in LA where appropriate ALNET Act. Linking to local and national strategies - including WESP Statutory consultation to enlarge school and address inefficient number of SS places Proposal addresses business continuity risks in terms of space which if not acted upon could impact on standards of education and or lead to increased tribunals Employers requirements will be revised to be appropriate for specialist provision Pre-occupancy questionnaires and pupil and staff engagement.</p>
<p>Prevention - Acting to prevent problems occurring or getting worse</p>	<p>The right school in the right location at right time. Increase in pupil places to support pupils being educated within Swansea with the right services. Working with the Funding and Information unit, School Support Unit, EIA and Access to Services, FIU and ALN Team to establish the need. Ensure project links to the Strategic Outline Programme Liaise with internal departments such as Legal Services, Planning, Housing and Estates. Measurable benefits identified and agreed by key stakeholders Employers Requirements reviewed, updated and applied Determine need for additional services, ALN, childcare, community use, flexible use Flexible design Parents, families, learners in LA where appropriate 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</p>

	<p>Maximise resources Links with regional colleagues, cross boarder collaboration Reducing LAC & NEET Health/education hub</p>
<p>Integration -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 together with WBFGA and WG 21st century aims and objectives incorporating their terms and conditions as appropriate Joint working with Health, Social Services, Education Opportunity to support transformation agenda, standards, Changes in curriculum Working with other LAs, providing opportunities for outreach, centres of excellence, shared good practice EIA/IIA and WBFGA carried out Considered and evaluate the impact on other schools in the locality Considered and evaluate the impact on local services and the area as a whole Considered and evaluate the impact on other LAs Pre-occupancy questionnaires for pupil and staff engagement</p> <p>There will be an impact on third party provisions as we will be aiming to reduce the reliance on these businesses</p>
<p>Collaboration - Acting together with other services or external organisation towards our well-being objectives</p>	<p>Working with the Funding and Information Team, Stakeholder and School Support Team, Pupil Support Team, Capital Team, Access to Services, FIU (Family Information Unit), Additional Learning Needs and Inclusion Team, Social Services and Health Ensure project links to the Strategic Outline Programme and council priorities Stakeholder engagement using stakeholder map and communications plan Beyond Bricks and Mortar targets and Welsh Government objectives are agreed with relevant bodies. Statutory consultation process carried out. Consultation with all required departments to produce and ensure that Employers Requirements are updated and relevant. Pre-occupancy questionnaire for pupil and staff engagement Liaise with cabinet and local ward members Liaise with other schools, colleges, universities, other LAs</p>

<p>Involvement - 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 Funding and Information Team, Stakeholder and School Support Team, Pupil Support Team, Capital Team, Access to Services, FIU (Family Information Unit), Additional Learning Needs and Inclusion Team, Social Services and Health Liaising with other partners including Social Services, Health Ensure project links to the Strategic Outline Programme and Corporate Priorities Stakeholder engagement using stakeholder map and communications plan Beyond Bricks and Mortar targets and Welsh Government objectives are agreed with relevant bodies. Statutory consultation process carried out Consultation with all required departments to produce and ensure that Employers Requirements are updated and relevant. Pre-occupancy questionnaire for pupil and staff engagement Access to services Parent/carer forum. Reflecting diversity of service users and need Community involvement Pupil voice, big conversation Staff, parents, Social Services Liaise with cabinet and local ward members Statutory consultation will be carried out for the project.</p>
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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintaining and enhancing Swansea's natural resources and biodiversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 the Council's Well-being objectives.

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 Prosperous Wales: 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"> • Transform the Special School provision and estate to meet demand • Improve outcomes for LAC children with specific ALN and families • Promote renewable energy – low carbon build and building • Improve education and skills for pupils with ALN • Build to BB104 requirements, so not imposing infrastructure that is not required • Right schools in the right places. Responding to change in ALN requirements. i.e. where this is a current and projected need. • Addresses the need to implement ALNET Act changes to curriculum and requirements for ALN (flexibility) • Long term provision to meet current and projected demand • Shared use of assets, maximising community use and flexibility of asset • Pupils can go to specialist provision within their LA allowing families to stay together • Encourage sustainable transport via School traffic management plans & travel plans. less pupils will need to be transported out of county • BREEAM Excellent • EPC A • Reducing CO2 emissions • Utilising energy effectiveness tools within school buildings as teaching aids. • Beyond Bricks and Mortar targets and Welsh Government objectives are agreed with relevant bodies.
<p>A Resilient Wales: 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"> • Use of Asset Review. Economically viable options thereby maximising assets • Provide a service that is sustainable and fit for the future • Beyond Bricks and Mortar targets and Welsh Government objectives are

		<p>agreed with relevant bodies.</p> <ul style="list-style-type: none"> • BREEAM as appropriate to size guidelines • EPC A • Reducing CO2 emissions – low carbon build / building • Utilising energy effectiveness tools within school buildings as teaching aids. • Site designed to incorporate green spaces and biodiversity • Development of outdoor learning areas maximise educational opportunities (habitat, growing, healthier choices) • Flexible design • Parents, families, learners stay in LA where appropriate • 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 • Maximise resources • Need to link with regional colleagues, cross border collaboration • Reducing LAC & NEET with ALN • Health/education hub
<p>A Healthier Wales 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"> • Outdoor areas to include habitat areas and appropriate outdoor spaces and sports facilities in line with BB104 Guidelines • Appropriate school / amount of places for ALN in the most appropriate location. Responding to change in communities and upturn in ASD , provide a service that is sustainable and fit for the future • Development of outdoor learning areas maximise educational opportunities (habitat, growing, healthier choices) • Supports improved opportunities for pupil attainment in schools through improved learning environments • Improve social, cultural and environmental wellbeing of pupils with ALN • Reduce social isolation • Improve education and skills for pupils with ALN by meeting needs within LA where possible within a suitable learning environment • Provide timely and effective support within LA where possible • Access to health services • Supports enterprise opportunities for pupils • Working with the ALN team to establish the needs and promote inclusivity - site and school building fully accessible. • Early consultation with Cultural Services and Parks and that takes account of the needs and requirements of these services and of the community

		<ul style="list-style-type: none"> • Working with estates and planning to support regeneration of the area linked to LA pilot housing scheme/s • Joint working with Health, Social Services, Education - One stop shop • Opportunity to support transformation agenda, standards, changes in curriculum <ul style="list-style-type: none"> • Working with other LAs, providing opportunities for outreach, centres of excellence, shared good practice <ul style="list-style-type: none"> • more pupils remain in the local authority so less time travelling, pupils in a better frame of mind when arriving at school, improved wellbeing • Active travel opportunities • Chances for parents, families to link, well being opportunities, support network <ul style="list-style-type: none"> • more families can stay together supporting reduction in LAC for pupils with ALN • bespoke services / physical environment within the building will allow for better sports and general activities for pupils and the wider community, supporting wellbeing and having a positive impact on families, community and support curriculum changes and delivery • supports regeneration of area/s
<p>A More Equal Wales 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"> • Considered and evaluate the impact on other schools in the locality - neighbouring schools a key stakeholder • Consider and evaluate the impact on local services and the area as a whole • Working with the ALN team to establish the needs • Statutory consultation process carried out • Pre-occupancy questionnaire for pupil and staff engagement • working with housing and estates to support regeneration of the area (pilot housing scheme with estates) • Fully accessible, 21 century purpose built special school building • Pupils can stay within LA (there may be a small cohort that may still need to be educated elsewhere) • Reduce social isolation through increased community use • Building supports delivery of curriculum that fulfils pupils potential, supporting their wellbeing regardless of need • Inclusive for community and families • Distribute knowledge of expertise of staff with other schools/STFs • Opportunities for jobs during the build through BBM opportunities and in the

		<p>new school build</p> <ul style="list-style-type: none"> • Impact of services on one site • Enables pupils with effective use of curriculum and enterprise opportunities leads to pupils fulfilling potential • Access to appropriate outdoor areas and green space • More pupils remain in the local authority so more opportunities to participate in Swansea community
<p>A Wales of Cohesive Communities Attractive, viable, safe and well-connected communities.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • Statutory consultation process carried out • Shared use of assets, maximising community use and flexibility of asset • Secure by design • Insurance requirements adhered to • Working with housing to regenerate area • Community use of fully accessible services • Reduce social isolation through increased community use • Enterprise opportunities • Community of vulnerable learners where appropriate services are provided, curriculum opportunities • Bolster connection of families, form friendships, networks - resilience, more social connections leads to wellbeing improvements • Active travel opportunities • Opportunities for hub working, training, health, one stop shop • Flexible design of asset • Raises awareness of disabilities in the community, enhances inclusivity • DDA sports, Arts, Drama opportunities • Community engagement events • Community use of building • Multi agency working • More pupils remain in the local authority so more opportunities to participate in Swansea community
<p>A Wales of Vibrant Culture & Thriving Welsh Language 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"> • Further opportunities for DDA arts, sports, enterprise opportunities, social skills, etc. • Improvements in pupils attainment and wellbeing • Increased community involvement and use

		<ul style="list-style-type: none"> • 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. • The Welsh in Education Team support schools with training and resources to improve and increase the use of Welsh in schools. • Equality of opportunity • The project will be consistent with the aims of the WESP.
<p>A Globally Responsible Wales 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"> • Site selection considers the proximity and best use of natural habitats • Consideration of the Council corporate aims and objectives together with WBFGA and WG 21st century aims and objectives incorporating their terms and conditions as appropriate • Consider and evaluated the impact on other schools in the locality - neighbouring schools a key stakeholder • Consider and evaluate the impact on local services and the area as a whole - community engagement sessions • Cross boarder collaboration with other LAs and ALN teams • Schools work with partners in colleges, other schools, other LAs and countries • ABA provision development • Secondment opportunities • Consideration of corporate objectives • Globally responsible school • Opportunities to share expertise etc. • Health /education hub • BBM opportunities during build • Low carbon build / building • design to support biodiversity and outdoor learning opportunities • Stakeholder engagement, statutory consultation process

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?

(You may need to discuss this with your Service Head or Cabinet Member to consider more widely if this proposal will affect certain groups/ communities more adversely because of other decisions the organisation is making/have made.

For example, financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)

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)
Some pupils may have to travel for longer to get to school and back if the new school building is further away from their home than that of their current school, however, some pupils will have a reduced journey time.	There is a legal obligation for the Local Authority to ensure suitable transport arrangements. Pupils will be supported with regards to any change in transport arrangements. Pupils will have the opportunity to ‘trial run’ the new journey prior to opening.
Amalgamating two schools and moving pupils onto a new site will inevitably cause some disruption and uncertainty for a period of time.	The LA will work closely with schools to ensure suitable transition arrangements are made with pupils to support them throughout this period. This will include visits to the school prior to opening to familiarise themselves with the new surroundings, and taster sessions. Pupils will have the opportunity to ‘trial run’ the new journey prior to opening. School staff will work closely with pupils to ensure any concerns are alleviated and all pupils are supported throughout the transition.

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 closely monitored by the Education Directorate and the school by using well established project and programme management boards.

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
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.

Action Plan: Please outline below any actions identified throughout the assessment or any additional data collection that will help you monitor your initiative once it is implemented:

Action	Dates	Timeframe	Lead responsibility	Progress	Add to Service Plan
Note and take action (where necessary) following the completion of the statutory consultation	Consultation – 9 Oct 23 – 24 Nov 23	Oct 23 – Dec 23	Project Team	Ongoing	N/A
Ensure pupils will be supported with regards to any change in transport arrangements. Pupils to have the opportunity to ‘trial run’ the new journey prior to opening	Jan 2028 – April 2028	Jan 2028 – April 2028	Transport Team, School and Project Team	Ongoing	N/A
The LA to work closely with schools to ensure suitable transition arrangements are made with pupils to support them throughout the transition period. This will include visits to the school prior to opening to familiarise themselves with the new surroundings, and transition days. Pupils will have the opportunity to ‘trial run’ the new journey prior to	Jan 2028 – April 2028	Jan 2028 – April 2028	Transport Team, School and Project Team and Contract	Ongoing	N/A

<p>opening. School staff will work closely with pupils to ensure any concerns are alleviated and all pupils are supported throughout the transition.</p>					

*** Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).**