



ALN IMPACTS & MITIGATING FACTORS – ADDITIONAL INFORMATION

CATHOLIC EDUCATION PROPOSAL

- Close St Anthony's Catholic VA Primary School in Saltney, which will cease to operate by 31 August 2027.
- Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint and St Richard Gwyn Catholic VA High School in Flint.
- Amalgamation would see:
 - the individual schools close by 31 August 2027;
 - a new amalgamated English medium 3-18 Catholic Voluntary Aided school, with a new name and school number, open 01 September 2027;
 - the new school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030).

Spring-Summer 2026

PART A. INTRODUCTION

Within Flintshire there are six schools that are categorised as English-medium Catholic faith voluntary aided schools:

- St Anthony's Catholic Voluntary Aided Primary School, Saltney.
- St David's Catholic Voluntary Aided Primary School, Mold.
- St Mary's Catholic Voluntary Aided Primary School, Flint.
- St Winefride's Catholic Voluntary Aided Primary School, Holywell.
- Venerable Edward Morgan Catholic Voluntary Aided Primary School, Shotton.
- St Richard Gwyn Catholic Voluntary Aided High School, Flint.

For the purposes of this document, the schools will be referred to by their shortened unique name. For example, St Anthony's Catholic Voluntary Aided Primary School, Saltney, will be referred to as St Anthony's.

The schools of St Anthony's, St David's, St Mary's and St Richard Gwyn are subjects of the proposal and would be directly affected should it be implemented.

This document supplements the Statutory Consultation document which consultees should consider to fully participate in the consultation process.

<https://flintshire.gov.uk/CatholicEducationConsultation>

The consultation period will open on **Tuesday 16 June 2026** and close at 11.59pm on **Wednesday 29 July 2026**.

Any figures, statistics and material referenced in this document are the most accurate available at the time of preparation and publication.

Impact Assessments are working documents which will be updated following information and feedback from the consultation process.

PART B. PURPOSE OF ASSESSMENT

The vast/greater majority of Flintshire children and young people will have their educational needs and ALN identified, met and monitored within mainstream schools or local further education institutes (FEIs). This will be through differentiation and access to appropriate strategies and targeted interventions within a universal offer of high quality education. During any school re-organisation proposals in line with the new School Organisation Code 2026 special consideration must be paid to pupils with ALN under the relevant criteria.

This document explains how due consideration has been given to pupils with ALN within the settings directly affected by the proposals.

PART C. QUALITY & STANDARDS IN EDUCATION

Ensuring that any alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners (including learners with ALN).

In line with the Additional Learning Needs and Educational Tribunal (Wales) Act 2018 (ALNET), the Council supports the underlying principles of the additional learning needs (ALN) system in Wales which are outlined in the ALN Code for Wales and aim to:

'support the creation of a fully inclusive education system where all learners are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.'

Section 3.1, Ch 3: Principles of the Code, ALN Code for Wales 2021

The Council is committed to a policy of inclusion for all learners and recognises the importance of an inclusive education where the majority of children and young people with ALN are supported to participate fully in mainstream education as outlined within the ALN Code. We believe that access to a high-quality education is a requirement to support all children and young people to become active citizens.

All schools are required to adhere to the statutory duties placed on them by ALNET so children identified as having ALN would be protected in line with the legislation. Current figures from the PLASC 2025 census show the following number of IDPs:

Saltney, St Anthony's Catholic VA Primary School

IDP Type	IDP Number	Number on Roll	% with IDP's
Local Authority	1		
School	6		
Total	7	51	13.73

Mold, St David's Catholic VA Primary School

IDP Type	IDP Number	Number on Roll	% with IDP's
Local Authority	2		
School	6		
Total	8	64	12.50

Flint, St Mary's Catholic VA Primary School

IDP Type	IDP Number	Number on Roll	% with IDP's
Local Authority	7		
School	22		
Total	29	281	10.32

Flint, St Richard Gwyn Catholic High School

IDP Type	IDP Number	Number on Roll	% with IDP's
Local Authority	9		
School	51		
Total	60	739	8.12

Under the Welsh Additional Learning Needs (ALN) system, both school-maintained and Local Authority (LA)-maintained Individual Development Plans (IDPs) hold the exact same legal status. The primary difference is who is responsible for creating, funding, and maintaining the plan, which depends entirely on the complexity of the child's needs and their living situation.

If a child has ALN then they have a right to a statutory plan called an individual development plan (IDP). Young people up to the age 25 with ALN are entitled to an IDP if they stay in education.

An IDP is a statutory plan and will say what the child or young person needs to be able to support their learning, The IDP is intended to be a flexible document. It will vary in length and complexity depending on the different needs of the child or young person.

There are no Local Authority Specialist Resource bases at the four schools directly affected by the proposals. These are predominantly school-based IDPs and reflect a range of individual needs. The Council has experience of supporting transition for children and young people with ALN as part of school reorganisation programmes and would work collaboratively to understand and support the particular needs and requirements of learners impacted by this proposal.

In terms of the standard of education, the Curriculum and Assessment (Wales) Act 2021, mandates that headteachers must provide a curriculum which includes the following expectations:

- be suitable for learners of differing ages, abilities and aptitudes
- be broad and balanced

The proposed reorganisation will provide a significant improvement in the resources available to meet the requirements of the legislation referenced, and enhance the educational offer through the following:

- A modern learning environment which has been specifically designed to deliver the Curriculum for Wales and also support learners with ALN to maintain their education within the mainstream setting
- A larger staff complement which would allow for:
 - the development and implementation of a broad and balanced curriculum offer

- curriculum specialist roles to support the delivery of the curriculum and inform teaching and learning to support access for all learners
- the development of ALN specialisms to enhance awareness and understanding
- increased levels of intervention and support available to learners
- broadening of an extra-curricular offer which can allow for learners to engage with and develop their particular areas of strength

PART D. ACCESSIBILITY/TRANSPORT

The impact of proposals on the transportation of learners with SEN.

The Council has extensive experience of transporting children and young people with ALN to specialist settings, both within the county and to settings outside of Flintshire. Many of these learners have significant and complex needs and care is taken to ensure that they are suitably supported to make these journeys on a daily basis. Some of our most vulnerable learners in our specialist schools and further Out of County provision, are transported across the County and beyond on a daily basis.

The Council provides School transport in line with national guidance requirements. No transport arrangements will be introduced without appropriate risk assessment and monitoring. Pupils with ALN will be assessed on an individual basis paying full attention to their IDP requirements and any criteria for free school transport. This includes any pupils accessing post-16 education.

Wherever is practicably possible, the Council supports Active Travel measures to promote healthier, happier school journeys. Taking steps to promote active and sustainable travel can help shift travel habits and build support for change.

Schools should consider a range of options to improve school travel and monitor their impact. Pupils are encouraged to walk, cycle, scoot, car share and use public transport on the school journey.

Initiatives can be used to help promote Active Travel, such as organised events and clubs, 'walking buses', encouraging public transport users to get off a stop earlier to walk the remainder of the journey and a 'park and stride' to promote those who use private vehicles to park away from school and walk the rest of the way.

Following assessment against Welsh Government's statutory guidance, the walking routes within the Flint area are not classified as hazardous. The combination of continuous pedestrian infrastructure, safe crossing facilities on higher traffic roads, and generally favourable walking conditions ensures that learners are able to travel to school in reasonable safety.

Based on current learner profiles and the location of the proposed new school, it is anticipated that travel arrangements for learners with Additional Learning Needs would remain manageable, with the majority of pupils continuing to access provision within a reasonable travel distance. Where increased travel is required, this is expected to be limited and capable of being supported through appropriate transport arrangements.

The Council currently undertakes detailed transport assessments for learners with Additional Learning Needs and younger pupils, ensuring that individual circumstances, mobility, independence levels, and specific barriers to travel are fully considered. Appropriate and proportionate arrangements are identified on a case-by-case basis in accordance with the Council's statutory duties and established processes.

Transport provision for learners with Additional Learning Needs is delivered in line with the Council's established contractual, safeguarding and operational arrangements, including appropriate supervision, the use of trained staff and DBS-checked escorts where required, and

the implementation of established safety and emergency procedures to support safe and accessible travel.

Please see the Transport Impact Assessment for further details.

PART E. CAPACITY AND ACCESS

Evaluating how proposals change the availability of specialist places for primary/secondary learners and ensuring access to appropriate specialist staff.

There are currently no Local Authority specialist Resource Bases across the Catholic network of schools, and as such, the proposed reorganisation will not result in a reduction of specialist provision. It is anticipated that the development of a larger school and staffing complement, will facilitate the development of specialist school-roles in response to pupil need.

Regular training, advice and support for Additional Learning Needs Coordinators (ALNCOs) is provided by the Council and sharing of expertise across schools is strongly encouraged, in line with ALNET priorities.

In line with the Council's principles for inclusion, all new schools have modern provision for ALN as a standard part of the design. This not only enhances the environment but in a larger setting, provides more scope for hub working and the sharing of expertise between staff, and potentially, access to specialist places where appropriate. It also allows for consideration around the access to appropriate specialist staff from a curriculum and ALN perspective.

PART F. CONSISTENCY OF SUPPORT

Ensuring that changes align with the ALNET Act to provide a unified, equitable, and flexible system of support for pupils with ALN

The Council recognises that safeguarding and the impact on pupils with Additional Learning Needs are a critical consideration, and these concerns were identified during the first consultation and remain a priority. Consultation with school staff and parents about the needs of pupils and groups of pupils will be undertaken before any transition.

All statutory duties under the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (ALNET) and the Equality Act 2010 will continue to apply. No pupil with Additional Learning Needs would be transferred without appropriate planning, and existing Individual Development Plans would remain in place throughout any transition.

It is felt that a consolidated school has the potential to enhance support for pupils with ALN through:

- increased staffing capacity.
- access to specialist expertise.
- improved consistency of support.
- purpose-designed facilities, including nurture spaces and small-group rooms.
- Better acoustic design of buildings essential for creating environments that support the unique needs of pupils with ALN.
- A flexible system of support to reflect the changing pattern and nature of a pupil's ALN.

Smaller schools will struggle to offer this enhanced provision.

PART G. TRANSITION AND CHANGE

Ensuring that the disruption to learners is minimised

The Council understands that transition can be particularly challenging for some pupils. If the proposal proceeds, transition arrangements would be planned in collaboration with families, schools and professionals, including phased visits and tailored support where required to minimise disruption.

The Council has extensive experience supporting ALN pupils through school reorganisations. In previous projects, personalised transition planning has enabled vulnerable learners to adjust safely and confidently. Should this proposal proceed, pupils with ALN would receive:

- Personalised transition plans based on individual needs.
- Enhanced familiarisation visits during transition
- Visual supports, social stories, and pupil-friendly explanations
- Opportunities for pupils to meet new staff in advance.
- Phased transitions, gradually increasing time on site where required.
- Close liaison between ALNCo, class teachers, families, and external agencies.

PART H. INDIVIDUAL DEVELOPMENT PLANS (IDPS)

Ensuring that school re-organisation does not disrupt the delivery of IDPs, which act as binding, integrated plans.

Under the ALNET Act 2018 in Wales, the duty to maintain an IDP transfers when a pupil moves to a new school, the IDP transfers with them, and the new setting becomes responsible for maintaining and reviewing it.

When a pupil moves, the IDP also acts as a tool for transition as it is a "living" document, it can be reviewed and updated to suit the new environment or if the child's needs have changed.

The purpose of the IDP moving with the pupil is to ensure they continue to receive the necessary Additional Learning Provision (ALP) to be successful at their new school and minimise where possible disruption to their learning.

PART I. COLLABORATION AND INCLUSION

Creating or maintaining specialist hubs and expertise to ensure pupils remain part of the school community, avoiding, where possible, segregation.

Inclusion is an ongoing process rather than a fixed state. In the longer term, a single, well-resourced school offers several advantages to an inclusive environment within school, including:

- Greater opportunities for staff career progression and leadership pathways
- Stronger capacity for professional development and mentoring
- Access to specialist roles, e.g. ALN, wellbeing, pastoral support
- Improved flexibility for staff deployment and cover arrangements
- Reduced workload pressure through larger, more resilient teams
- Strengthened collaboration and sharing of expertise between colleagues.

The Council will continue to work closely with parents, children, young people and educational staff to improve outcomes for those with ALN.

Any new build requires significant involvement of school leaders in terms of design and implementation. This ensures that the learning environment has been informed by the practitioners who will be delivering the education within it, and as such, should be reflective of, and responsive to the needs of the learners. It also means that any known effective practice can be considered as part of the design. Likewise, learners will also be involved in planning events for the new build.

This approach has resulted in quite different school designs across the county, each being informed by particular learning community needs. It also improves the school's ability to provide an inclusive education and facilitate learners to access their education in a mainstream setting, in line with both the Council's and Welsh Governments guiding principles for ALN.

PART J. INVOLVEMENT

Proactively seeking the views of children and parents (person-centered approach) during the consultation phase of school proposals.

This will be captured as part of the Children & Young People consultation sessions, officers will ensure there is representation for children with ALN in any groups identified by the school. Consultation with school staff and parents about the needs of their pupils with ALN will be a part of their transition support package.

During the design phase of any construction staff and pupils will be encouraged to provide input particularly for specialist areas.

PART K. STANDARDS OF NEW PROVISION

how proposals fit with the local authority's plans for promoting inclusion (i.e. providing for a higher proportion of pupils with ALN to attend mainstream settings)

The Council is committed to a policy of Inclusion for everyone, with a drive for the ongoing development of inclusive cultures and communities in and around our mainstream schools.

Beyond transition, the new school will offer a step-change in the mainstream provision for children with ALN. Purpose-built ALN facilities would include:

- Small-group teaching and intervention rooms
- Calm rooms designed for emotional regulation
- Sensory regulation and low-stimulation spaces
- Specialist hygiene and accessibility facilities
- Wider corridors, improved acoustics, and thoughtfully designed layouts
- Outdoor sensory and wellbeing spaces
- Breakout zones that support de-escalation and inclusion
- Improved acoustic design of classrooms

These facilities directly respond to the needs raised by families and cannot be achieved within the constraints of the current buildings, that have not got these facilities. The aim is not only to protect existing support but to strengthen and modernise it.

The proposed new school will fully comply with and equality and disability discrimination legislation. Existing schools do not have up to date standard environments for pupils with disabilities including hygiene rooms, accessible toilets which are all built into to a modern school design.

We recognise, many children or young people with ALN have a disability. For the purposes of the Equality Act 2010 – having a disability is one part of the definition of ALN and the other part (significantly greater difficulty in learning than the majority of others of the same age) may in some cases amount to a disability. In summary, ALN is the educational term for the support, while disability is a legal status; many ALN learners have both. The Council's view is that pupils with ALN and or a disability would be fully supported at any alternative schools.

The nature of any significant school reorganisation proposal is that every child will experience change. The Council will endeavour to prepare the child and the adults working with the child in the best possible way to minimise impact of the change. Needs will be reviewed in line with the Council's statutory responsibilities and tailored towards individual learners.

The Council has a strong track record of supporting learners through relocations to new sites, including successful transitions into new accommodation. The most recent Mynydd Isa Campus has three Local Authority Specialist Resource bases for Primary and Secondary children. The transition involved enhanced support for schools and all learners, to adjust smoothly to their new environment.

With a number of specialist interrelated services, the Council's Inclusion & Progression Service ensures its duty under The Additional Learning Needs Code for Wales 2021 is delivered.

Services include:

- Education Psychology Service;
- Young Persons Counselling Service;
- Sensory Service;
- English as an Additional Language / Gypsy Traveller Service;
- Children looked after Service;
- Additional Learning Needs Service;
- Speech, Language & Communication Service;
- Autistic Spectrum Condition Service; and
- Engagement Services.

For further information on our policy for children with ALN please refer to:

<https://www.flintshire.gov.uk/en/PDFFiles/Lifelong-Learning/Schools/Children--Young-People-with-ALN/FCC-Policy-Framework-for-Children-with-ALN.pdf>