

Cyflwynwyd yr ymateb hwn i ymchwiliad y [Pwyllgor Plant, Pobl Ifanc ac Addysg i weithredu diwygiadau addysg](#)

This response was submitted to the [Children, Young People and Education Committee](#) inquiry into [Implementation of education reforms](#)

IER 23

Ymateb gan: NASUWT Cymru

Response from: NASUWT Cymru

Nodwch eich barn mewn perthynas â chylch gorchwyl yr ymchwiliad. | Record your views against the inquiry's terms of reference.

1. Members tell us that the current implementation of the Curriculum for Wales (CfW) is handicapped by various factors:
 - Many secondary schools opted to restructure their subject leadership TLRs to mirror the AoLEs. Aside from resulting in accountability vacuums, such restructuring was found to be inadequate for implementing the CfW. Having a broad management system based on the AoLEs fails to account for subject specialism. Many schools have rolled back to a subject specialist management system.
 - Whilst a principle of the CfW is for schools to be architects of their own curriculum, this has disadvantages in that neighbouring / cluster schools may have differing, incompatible curriculums. The responsibility of interpretation has been laid on teachers which is significant requiring practice of new skills and confidence, with the less experienced teachers depending on the more experienced which increases their workload.

Members report that they have had little if any guidance, feedback or resources from pioneer schools who have been wary of sharing materials due to competition for enrolment.

In response to the NASUWT's UK-wide Survey in 2022, 28.5% of respondent teachers cited curriculum reform as a major concern but in Wales alone this was 46.8%. 78.5% of respondents from Wales cited workload as a major concern and 89% said that their workload had increased in the previous year.



An education experience that is more creative than sitting in rows and listening to a teacher requires space and resources. All of these depend on funding, and schools in deprived areas will be less able to make sufficient provision.

2. Members tell us that the level of consistency is variable and is dependant on many factors:

The flexibility to develop the CfW is restricted by the staffing compliment of the centre. E.g., secondary schools may have had to make redundancies this year which may mean a further reduction in the teaching workforce. In reality this could mean losing the only art teacher; having a part-time music teacher. The effect is to shrink the curriculum and so reducing learning opportunities. The WG must realise that per capita funding of schools doesn't provide a consistent learning opportunity regardless of geographical location.

The CfW approach relies on secondary sites of learning – if a disadvantaged pupil is not getting that support from home this will result in unequal educational outcomes. The emphasis on IT will be a barrier for those without sufficient broadband or equipment. A school in a working class area will likely stress operations and local skills rather than the exploration of principles and general skills, the pacing is likely to be weakened. This may lead to a narrower range of experiences.

3. One of the greatest errors with the implementation of the CfW was to introduce it before Qualifications Reform.

Qualifications informs the assessment practice lower down the school. As schools are still largely judged on standards there is enormous pressure to hone the skills appropriate for qualifications as early as possible. Secondary schools are geared up for this and will ensure that learners are well practiced in the appropriate skills before they select their subjects for formal qualifications.

The disconnect between Qualifications Reform and CfW assessment has caused chaos and confusion in Secondary schools. Teachers are loathe to build new assessment regimes when they are not clear what skills will be required in the new Qualifications. This can lead to teachers falling back on tried and tested assessment regimes. Deeper investigation may find that the CfW is no new Curriculum at all but the old one with a few tweaks.

Over the past year, Qualifications Wales (QW) has been consulting upon the form of 14-16 qualifications. NASUWT has maintained that any assessment must lie with the examining board and not with the school. QW are advocating some assessment



processes that seek the teacher to assess and perhaps moderate the work. Such a high-stakes activity is workload intensive and the stresses and expectations can unfortunately push a minority to realms of malpractice. This can be avoided if the teacher administers the assessment and the examining board attend to every other stage.

4. Members report that high workloads arise from running two systems, from a lack of hours to manage the tasks, from conducting annual reviews as well as completing new IDPs, managing an increased number of applications, managing ambiguities around definitions of SEN, ALN and Universal Provision (UP), managing parent expectations, and lack of parity in implementation and awards made between schools and LAs. Also, for example

- One ALNCo (0.5 FTE) had 10 new IDP's written in the autumn term. Another 0.5 FTE ALNCo attended 25 PCM which each take 2 hours, wrote 10 new IDPs, reviewed 4, and made 20 referrals. Many work up to 11p.m. most nights and some nights till 1a.m.
- Next year (2023/24) ALNCo's will be doing annual reviews as well as writing new IDP's.
- Some parents have the extra paperwork evidence ready, whilst others have no understanding of the importance of keeping this evidence. This adds to the time needed to gather the required documentation.
- The creation of UP led to previous SEN pupils not being recognised under ALN provision. This leads to parents misunderstanding how this change has occurred. E.g. if a child is autistic they are not necessarily ALN, but should be covered by UP.
- The increased awareness of the ALN process has led some parents to challenge the refusal of ALN provision, they take up the 35 day appeal which leads to more work, confusion, and also an award.
- Many parents go down the developmental route and get an IDP that way.
- The Looked After Panels are also asking for an IDP.
- The new ALN process means needs get downgraded - a lot of Action Plus now comes under UP. In practice these need more input than the classroom provision can provide, and this is without extra resources or funding. Previous specific support for e.g. dyslexia or dyspraxia has been disbanded. Teachers are not confident to deliver this, and there are high numbers in the classroom.
- All ALNcos reported that writing the new IDPs took extensively longer than previously.
- The system is more complex and the form-filling process needs streamlining. There is a lot of repetition which doubles the workload.



- ONE ALNCo was off for stress for 3 months, due to not being able to complete the ALNCo role properly.

There is huge concern about the increased accountability of ALNCoS, coupled with a lack of resource provision and support. There is concern about possible resistance to change in incorporating into the classroom the teaching needed to provide inclusion for all. Teachers do not have enough time to carry out professional development through enquiry and critical reflection.

Questions are also being asked on the effectiveness of generalising ALN provision within the classroom. The CfW ethos prioritises inclusion for all with individual assessments for learning, but this still depends on employing more staff which the school funding crisis compromises.

The ALN reform generally applies to systems rather than the ability of teachers to change mind-sets or pedagogy. Previous canvassing of Pilot Schools showed subject-based staff appearing to be less able to envision a different system of inclusion.

5. Members report:

- lack of parity in awards and in IDP and UP categories provide examples of unmet need (UP, Wellbeing and Mental health Support) and lack of funding to match needs.
- Confusion around application of the new categories for parents to understand. The new UP which should support some pupils is not understood by parents. This is exacerbated by the fact that the previous provision for support in the classroom is not there. The previous dyslexia support has been withdrawn, staffs in the classroom are not experts and this has had an impact. In relation to emotional development and support, the Thrive programme is no longer able to be delivered as the school cannot afford to keep up the licence to practice.
- The distinction between UP and ALN provision only works if there is UP in the classroom.
- When IDP's are written, and the eligibility for provision agreed by the LA, the provision agreed may well not match the resources sought. The funding allocated does not provide the classroom support needed.
- Disparity across school settings in the same LA depending on the resources of the school.
- An increase/decrease of the numbers coming under the umbrella of ALN.

6. Consortia are providing training on various CfW objectives. Alongside the courses there are funding streams available for schools to encourage cooperation. This is welcome, but



such training and resources should have been in place much earlier in the CfW journey. There have been pioneer schools in place to trial out new initiatives; there has been fair warning of the form and function of the AoLEs. Members tell us that they feel the professional learning settings are reverse engineering the provision – in that they are reacting to the situation as it is now, when they should have been providing foundations earlier on.

The average hours of CPD for respondent teachers in Wales in our Survey were 11.5h in the previous 12 months in comparison to a UK average of 14.1h. This is concerning given the significant changes being introduced. 39.3% of Welsh respondents felt disempowered by the lack of access to appropriate professional development.

With the CfW emphasis on autonomy and creativity of the teacher role, the provision of appropriate professional learning is important. There is varied accessibility and supply teachers have issues accessing it.

7. Funding is a key issue for the success of the CfW. Reduced school budgets may mean a reduction in specialist staff which will shrink the curriculum rather than enhance it.

90.9% of Wales respondents to our Survey said rates of adverse emotional personal/social issues among pupils had increased. Only 12.8% felt appropriate support was provided for pupil mental health issues. 58.5% of Wales respondents said that more than half of SEN pupils had lost ground academically over the preceding 12 months in comparison to a UK-wide average of 53.5%, being the highest across the UK nations.

Members reported:

- Parental expectations for an IDP due to slower development following COVID isolation of pupils.
- An evident drop in communication skills across the age ranges which impacts learning.
- For the younger age group, parents concerned that their child has ALN, when it is only late development in communication skills due to COVID isolation.
- Frozen and/or decreasing funds for the provision of ALN support. This means that the provision is not fully funded, and the school must find additional funds through their own resources.
- Gaps in provision increasing the burden on practitioners to provide for the additional eligible needs.
- that the funds given did not cover the needs for TA support, and that supply TAs were not available to cover for sickness or for a school shortfall in TA staff.



- Awards from LA are consistently at Band B level when Band A has been applied for. There is no parity over who gets IDP or not.
- That headteachers largely held responsibility for the management of funds.
- The funding is not attached to the IDP which leaves the allocation discretion to the headteacher.
- A clear need for emotional health and wellbeing support which is currently not being met. Children are assessed but there is no provision.
- Funding issues when a pupil attending the school is outside its catchment area.

In relation to ALN reform the biggest challenge was allocation of school funding to address the shortfall from LA provision. The schools in wealthier areas with higher reserves were more able to subsidise. For schools with a high proportion of ALN learners there was extreme pressure on funds. In rural areas there is increased difficulty in accessing the services needed to provide a holistic plan for ALN pupils. ALNCos reported different models of staffing for implementing the ALN provision: some schools have children of concern but no specialist teachers and no IDP; many see a variance in the hours provided for ALNCos as well as the robustness of the pastoral system.

