

Cyflwynwyd yr ymateb hwn i'r [Pwyllgor Plant, Pobl Ifanc ac Addysg](#) ar gyfer yr ymchwiliad: [A oes gan blant a phobl ifanc anabl fynediad cyfartal at addysg a gofal plant?](#)

This response was submitted to the [Children, Young People and Education Committee](#) for the inquiry: [Do disabled children and young people have equal access to education and childcare?](#)

AEC 51

Ymateb gan: Mudiad Meithrin

Response from: Mudiad Meithrin

Mudiad Meithrin is a national voluntary association of Welsh medium Nursery groups [Cylch(oedd) Meithrin], Ti a Fi groups, wrap-around care and day nurseries. Our aim is to create new Welsh speakers, campaign for Welsh-language care and education for all children, support our members and plan strategically to develop new services.

We have grown a great deal since 1971. Today, there are around 1,000 Cylchoedd Meithrin, Ti a Fi groups, 'Cymraeg for Kids' groups, 'Clwb Cwtsh' sessions and nurseries under the Mudiad Meithrin banner providing early years experiences to around 22,000 children every week.

We have seen over 3,500 individuals qualify directly into our Welsh-medium workforce with childcare qualifications, through our National Training Scheme and the Cam wrth Gam Schools Scheme. Mudiad Meithrin is an accredited and recognised centre by WJEC and City and Guilds, and by CACHE for the provision of the full range of post-14 and post-16 qualifications.

We also work very closely with parents to provide help and advice to enable them to develop and support the work of the groups at home, to pass on the Welsh language to their children or to start learning Welsh. We are a registered charity employing over 200 people nationally, with an additional 2,000 working in the groups and the nurseries. The groups are supported by a national network of professional staff who advise on a range of issues, such as business support, qualifications and staff recruitment, promoting good practice, staff training and working with local authorities.

Introduction

Mudiad Meithrin welcomes the opportunity to respond to this timely consultation by the Senedd's Children, Young People and Education Committee. It has been two years since the Additional Learning Needs (ALN) Code came into force which places a duty on non-maintained funded nursery settings (such as

Cylchoedd Meithrin) to support Local Authorities in their duty to identify children with ALN and maintain an Individual Development Plan for that child.¹ This happened at a time of financial austerity, which continues and is likely to get worse, and financial cuts have had a direct impact on the rights of disabled and neurodivergent children across Wales, and in particular their access to childcare and education. We also know that adults and children with additional needs are more likely to live in poverty, so that must be a central consideration when looking at factors that may impede or impair equitable access to childcare and education: We note that families with disabled children are much more likely to live in poverty².

Mudiad Meithrin is fully committed to the principle of giving all children equitable access to childcare and education, and the principle of child-centred planning, and that is reflected in the Admissions, Equality and Diversity and Inclusion and Equal Opportunities Policies of Cylchoedd Meithrin and day nurseries which are members of Mudiad Meithrin. 'Cylch i Bawb' is a training resource and a resource list that helps Cylchoedd consider inclusion in all aspects of the setting, and introduce Wales' diversity to young children. AcadeMi, the training department of Mudiad Meithrin, provides various training sessions on ALN and disabilities, and there is an all-Wales network of Coordinators to support the Cylchoedd with advice and guidance on all aspects of life at settings.

To get an idea of the current situation with regards to offering equitable access to education, Mudiad Meithrin shared a questionnaire tailored for three different audiences:

- Parents and carers of disabled and neurodivergent children
- Settings – Cylchoedd Meithrin and Day Nurseries
- Mudiad Meithrin support staff across Wales

The response to this consultation was based largely on their responses.

Three sets of data were also considered to search for information that was relevant to the consultation:

- Mudiad Meithrin's annual data collection work on the number of children with additional needs in Cylchoedd Meithrin
- ALN data from Care Inspectorate Wales' SASS collection provided to Cwllwm by the Welsh Government

Pupil Level Annual School Census (PLASC)

¹ The Additional Learning Needs Code (2021) <https://www.gov.wales/additional-learning-needs-code>

² Relative income poverty: April 2021 to March 2022: [Relative income poverty: April 2021 to March 2022 | GOV.WALES](#)

We have shared our response into the following sections:

1. Access to all parts of childcare and education provision
2. Challenges facing settings such as Cylchoedd Meithrin and nurseries
3. The Additional Learning Needs (ALN) Code
4. Support through the medium of Welsh
5. Main calls

Subheadings will present the main considerations in these main sections.

Section 1: Access to all parts of childcare and education provision

This section will focus primarily on our understanding of the experience of children and their parents/carers of childcare and non-maintained education. As noted above, all Cylchoedd Meithrin and nurseries have policies that commit the settings to welcoming all children and ensure that they are required to make reasonable adjustments in accordance with the Equality Act 2010 in admitting disabled children or children with any type of difficulty.

Most responses to our questionnaire for parents and carers showed satisfaction that their disabled or neurodivergent child had access to all parts of the provision. Here are some excerpts from the questionnaire:

'Great staff and excellent experiences'

'All indoor and areas are accessible, activities are planned and suitable, quiet areas available'

'There was a planning meeting to make sure that my daughter wasn't treated differently and to make sure that all kinds of support was in place for her.'

'My son was included in all activities, trips, games, etc.'

Of the answers received from parents or carers of disabled or neurodivergent children, 50% of respondents gave the highest rating for the experience they had, which was that they believed their child had access to all parts of the provision. 31.81% of respondents gave the low rating which means that they did not think they had received access to all parts of the provision (the rest scored somewhere in between).

The main reasons why parents and carers did not believe their child had full access to a Cylch Meithrin are listed below.

Understaffing

The main reason cited by parents was understaffing, which is supported by the response to the staff questionnaire which identifies staff shortages as the main factor if a child is excluded.

One parent reported that her disabled child had received first-class inclusive childcare in one Cylch Meithrin, but the family moved to another area and to a different Cylch Meithrin on a school site in the new area. The Cylch was able to recruit a member of staff after receiving funding for an extra pair of hands, but if the staff member was unavailable, the child was unable to attend:

'Due to lack of staff at Cylch Meithrin ***, my son was excluded for one whole cylch week and 1 day between April 2023 and the end of summer term.'

Several other responses agreed that staff numbers were the reason their child was unable to attend the setting as regularly as other children:

'Not enough staff, staff calling in sick, unable to open all day for them. Not consistent for their routine.'

This discrepancy can have an impact on the child and their development. The first parent quoted above noted that her 4-year-old son was already noticing that he was being treated differently. The inconsistency will cause problems for working parents/carers as well.

Awaiting funding

One of the most common reasons given for understaffing was that funding wasn't available from the Local Authority, or that it was necessary to wait and see if funding was available. According to the principles of the Additional Learning Needs Act, it is necessary to put the child at the centre and plan according to their needs, and therefore funding for extra pairs of hands will not be required in every case as everyone is different. Nevertheless, it appears from the responses that waiting for assurances of funding excludes the children who currently need it:

'Waiting to find out after the CDT meeting also waiting on outreach funding.'

'We are awaiting funding to be allocated for a 1:1 support, so that there is an adult to support our daughter by carrying her portable oxygen cylinder.'

'Waiting on a CDT meeting; my child was 2 in July but we don't have a start date for cylch because they want to check the support will be in place for him.'

Waiting to hear if funding is available affects disabled or neurodivergent children's right to childcare and education. The uncertainty will also affect the parents/carers' ability to plan their lives and ensure that their children benefit from opportunities to play and partake in early years education.

We will discuss staffing and funding issues from the perspective of settings in further detail in the next section.

School holidays

In the response to the questionnaire for parents and carers, the issue of funding during holidays was raised as one specific thing that prevented disabled and neurodivergent children from equitable access to childcare and education. One parent said in a phone interview that holiday periods was a 'very difficult time' and that funding for childcare for her daughter with intensive needs was cut earlier in 2023. This meant that, as a single mother, she faced weeks without respite from caring for her daughter, and that it adversely affected her mental health.

According to one parent, help to access respite care would be one of the biggest things that can be done to support them as a family during the holidays, but they have to fund and organise this themselves:

'We're not eligible for [*respite*] either, and we have to pay a family friend to do this for us. The holidays are a nightmare. We need more help and support. It's costing us a lot of money. Our son's costs are so much more expensive than other children so we must continue to work on very little sleep and very little respite in order to fund the extra needs. It's lonely and we're exhausted.'

There is real concern among parents and carers that services and support available during school holidays will be curtailed further.

Suitability of location and activities

Cylchoedd Meithrin are located in a variety of places – from purpose-built buildings where the group has a permanent base, to halls where the Cylch's resources must be cleared at the end of each session. From the responses received, there were no specific comments about the physical environment, and

several comments praised the accessibility and easy access to resources for all children.

Parents and carers felt that disabled or neurodivergent children were more likely to be excluded from trips than any other activity:

'Every trip they've had, my daughter didn't get a chance to go on because of her disabilities. There were never enough staff to take her even though she has a 1:1'

'Excluded from walks. All activities that he struggles with are planned for the day he is off.'

These examples do not highlight good practice of adapting activities to suit all children. We know that all children in settings benefit when real inclusion is implemented, and it is a concern what messages are conveyed to other children in the setting if their disabled or neurodivergent friends are not allowed to take part in the same activities.

Training:

A lack of training and expertise was a major factor that contributed to the negative experience of some parents and carers. In practitioners' responses to the questionnaire sent to them, many of them note that suitable training or the training they are looking for is rarely available. They also call for more advice and guidance from experts when trying to offer support to an individual child (a full discussion can be found in Section 2).

Parents and carers' worst examples include:

- A lack of understanding of how to support a child despite funding being offered
- A lack of understanding of differences between different conditions
- Better dialogue with parents and carers – a need to strengthen transition between the home and the setting
- The need for a willingness to implement plans and advice of experts at the setting
- A lack of intensive needs provision

We emphasise that only a minority of responses raised the points mentioned above, but Mudiad Meithrin will be keen to understand more about these findings and how we can support practitioners to upskill with regards to increasing their understanding about providing a complete service to disabled and neurodivergent children.

One parent said they had been welcomed in a Cylch Meithrin, but the group's willingness to accept the child did not mean that particular setting was the care provision that best suited the child – it was impossible for the child concerned to receive the specialist care through the medium of Welsh:

'My son went to a mainstream Cylch Meithrin where he had a one-on-one. I don't think he does a lot of activities with the other kids. There wasn't a PECS there, nor was there enough space for it, nor the expertise to use it. We used to travel from *** to *** twice a week to attend an English nursery with ASD expertise.'

The parent's experience points to a lack of specialist care through the medium of Welsh in particular, so better planning is needed to respond to children's needs through the family language. The same parent said:

'There is no adequate early years provision in ***. There needs to be a special nursery for children with ASD, through the medium of Welsh. Things improved significantly when he went to a school with a specialist unit. There are no play opportunities or Welsh-speaking groups in ***, and no opportunity to socialise with Welsh families. The speech and language service is terribly poor.'

The parent added that her child has now 'been released from the speech and language service despite my son not speaking a word'.

Discrimination based on disability and its impact

39.13% of parents or carers who answered the Mudiad's questionnaire said they believed they had experienced discrimination based on disability.

The level of choice of settings is lower for disabled or neurodivergent children, and parents feel they have to work hard to get the information they need, as well as find a suitable place that meets the child's needs. One parent recounted the struggle she had when trying to find a setting that would accept her child:

'Before my son started at Cylch Meithrin... I tried to get him into 3 other nurseries. All of them had spaces available until they discovered that my son had a disability and they would need an extra member of staff / support staff for some of the week. I was told on one occasion that 'it wasn't worth their setting hiring another member of staff for my son for less than an academic year'. Most nurseries I've approached seem to be unaware of disability rights and have no problem making myself and my son feel like a burden.'

It is clearly not acceptable that parents and children feel that they are a burden when they try to get a place in a nursery. This particular child needed a dedicated member of staff to supervise him due to a physical disability. Given the current context where it's difficult to find funding to support individual children, and if the nursery is already offering care to children with needs out of their own pocket, it can be very challenging for settings to be able to accept and support all children.

Another parent said she had to stop working because there was no funding available by now for her child with intensive needs to attend wraparound care on school premises:

'As a single mum I am unable to work due to lack of suitable child care..I have found the younger my daughter was the easier her needs were met (up to 3 years) now I cannot work because there isn't suitable childcare or anywhere that offers wrap around care for her school.'

Although her daughter received the necessary support during school hours, the parent was looking for care provision for two hours before or after school. The parent reported that having to give up her job due to the lack of care provision for her daughter in the mornings (apart from the option of paying for the care herself) had been a double blow – financially, but also from a mental health perspective.

From the responses to the questionnaire, it can be said that the information available to families varies throughout Wales. The requirements that emerged from the questionnaire were:

- Schools should offer more information to non-maintained settings and parents when parents are considering options and the next step for the child
- Schools should strengthen the transition between nursery and school
- That information is easily available without it being hard to find
- More health visitor visits for families with disabled children.

There is clearly a long way to go to improve the experience of disabled and neurodivergent children and their parents/carers with regards to childcare and early years education, and Mudiad Meithrin is keen to address these in collaboration with Local Authorities and the Welsh Government. The next section shows that the root of many of the experiences lies in factors beyond the control of leaders at nursery settings.

Section 2: Barriers preventing childcare providers from offering accessible coverage

Mudiad Meithrin collects data on the numbers of children with ALN in Cylchoedd Meithrin on an annual basis, along with the transition of children with ALN to Welsh medium education. The national percentage of children with ALN compares favourably with the percentage of children with ALN in schools in the same year according to data taken from the Pupil Level Annual School Census (PLASC).³

Year	ALN Needs attending Cylchoedd Meithrin	ALN Needs with Statement (% of all pupils in Wales)	ALN Needs with Statement (% of Welsh-medium sector)	ALN Needs with Statement (% of English medium sector)
2021-22	1.75	1.96	1.15	2.20

While this comparison is good news in terms of the representation of children with ALN in Cylchoedd Meithrin, we know that there is great variation in the level of intensity of children's needs within the data collected by Cylchoedd Meithrin, whilst the data from schools record if a child has a statement, which is a much more definitive yardstick.

The results of the Self-Assessment of Service Statement (SASS) questionnaire by Care Inspectorate Wales⁴ include responses from a variety of childcare settings: daycare, sessional care, (these are likely to be under 5s) childminders and clubs (a variety of ages). Cylchoedd Meithrin and members of Mudiad Meithrin are likely to be counted under the day care or sessional care categories. In 2023, fewer settings responded but the number of children with ALN increased according to the responses, although we do not know how the setting measured that (e.g. whether the child had been identified with ALN by the local authority).

Year	Total responses to SASS from individual settings	Total number of children (of all ages) formally identified as having ALN or a disability
2020	3113	4062
2021	3010	3921
2023	2787	4312

³ [Pupil Level Annual School Census \(PLASC\) \(gov.wales\)](https://gov.wales/plasc)

⁴ [Self-Assessment of Service Statement \(SASS\) | Care Inspectorate Wales](https://careinspectorate.wales.gov.wales/self-assessment-of-service-statement-sass)

While more information is needed to fully understand this data (and break it down to a local authority level), it appears on the surface that there is a significant increase in the number of children with ALN in all-ages childcare settings, which is in line with practitioners' perception that they feel there is an increase in the number of children with varying needs attending Cylchoedd. It is unclear whether this sharp increase is due to the introduction of the new ALN Code in September 2021.

The Pupil Level Annual School Census (PLASC) paints a different picture, with a sharp fall in the number and percentage of children identified with ALN in schools (excluding nursery and reception age).

	Wales	Wales	Welsh	Welsh	English	English
Year	All ALN Needs Pupils (number)	All Pupils ALN Needs (% of all)	All Pupils ALN Needs (number)	All Pupils ALN Needs (% of total)	All Pupils ALN Needs (number)	All Pupils ALN Needs (% of total)
2021-22	69,100	14.86	15,670	14.33	53,430	15.02
2020-21	87,360	18.64	19,155	17.39	68,205	19.02
2019-20	92,305	19.92	19,935	18.35	72,370	20.40
2018-19	98,875	21.37	21,465	19.93	77,410	21.80

Note that the percentage of children with an ALN Statement has remained the same, although the number and the percentage of children deemed to have ALN have decreased. The reduction is likely to relate to the transition to the new ALN system that came into force in September 2021. As the figures have been consistent over the years (even though a gradual decline is noted), the question must be asked, therefore, what accounts for the sharp decline? The reduction in the amount does not appear to be the number who have received an IDP under the new regime in 2021-22 either. We will continue to scrutinise these figures and any significant changes. We emphasise that identifying children who are being monitored or targeted, and for which purpose, is vital in order to plan services for the future. This is particularly true in the early years when many children receive targeted provision and may not receive an IDP until they are in a maintained setting (or early intervention in a non-maintained setting will have supported the child to develop and prevent any needs from escalating). Without this data, information on year-on-year patterns and numbers will not be available in order to gain a better understanding of how to support children, their families and the

setting they attend. A better understanding of the data is needed so that local authorities and the sector can improve their planning and support for settings. This data does not match the increasing numbers in the 2023 SASS, which is the only All-Wales dataset available for the childcare, play and foundation learning sector, and better information on the situation from 0 to 5 years would be in line with the aspiration in the Additional Learning Needs Act to see swift interventions normalised.

Better information will help to address the main factors affecting the ability of non-maintained nursery settings to offer equitable access to childcare and education for disabled and neurodivergent children – the main factors will be discussed under subheadings below which are based on the responses of Cylch Meithrin practitioners and Mudiad Meithrin's support staff to a questionnaire sent to them about their views.

Meeting a child's needs

Standard 4 in the National Minimum Standards for Regulated Childcare states that: 'Each child's individual needs, including any children with disabilities or additional needs (including additional learning needs), are planned for and provided for.'⁵

One of the major concerns communicated by Mudiad Meithrin practitioners and staff was that the setting could not meet the needs of the disabled or neurodivergent child in their care in all cases. They understand that they have a responsibility to accept a child and not discriminate on the basis of disability or other needs, but from time to time Cylchoedd will feel that they are unable to meet the child's needs for a variety of reasons. For example, if a child has behavioural issues one practitioner will need to keep an eye out and protect the child, but this will affect the ratios of staff who are supervising the rest of the children in the setting. This is not only a matter of protecting everyone at the the setting, but the setting may be in breach of Care Inspectorate Wales' minimum standards regarding care ratios. It can be a very frustrating situation for practitioners without support and guidance, along with concern that they are breaking rules and endangering the safety of other children.

Of course, every child is unique and meeting each child's needs will be different. We agree that there is a need to look at what support the setting needs and look at implementing inclusion by offering extra hands funding rather than 1-1, particularly when more than one child is receiving support in a setting; this strategy can help prepare the child for attending education without an extra pair

⁵ [National Minimum Standards for Regulated Childcare \(gov.wales\)](https://gov.wales/national-minimum-standards-for-regulated-childcare)

of hands. There may be a historical tendency by practitioners to say immediately that Extra Hands funding is needed before considering what the child's needs are and the best way of including and supporting them in the setting. However, we also understand that experience of not receiving help or guidance on how to support a disabled or neurodivergent child, lack of available funding or failure to recruit leads to anxiety and a seemingly negative response for parents/carers.

One practitioner said:

'We need rapid support for a targeted child (within general provision) as one member of staff drops out of the ratios by having to look after the child.'

Having to wait for funding applications is a barrier when nursery settings want to provide equitable access, and it is one of the factors that were frustrating for the parents as well as they waited for a place for their child.

Funding

Practitioners and support staff reported that financial support is not available for disabled or neurodivergent children under the age of 2 who wish to attend childcare.

Extra hands funding is more likely to be available for children who qualify under the Childcare Offer. The problem is that the Childcare Offer is offered based on the parents/carers' eligibility, not the child. This will exclude disabled and neurodivergent children from equitable access to childcare and education, when play opportunities and interaction with people and children may be one of the interventions that would make a real difference to that child.

The funding gap currently discriminates against children with ALN. We recently received evidence from a speech and language therapist who was visiting a child who had language development delay. In her opinion, he would not be identified as a child with ALN by the local authority, but she is of the opinion that he required early intervention to support his linguistic development. The child did not live in a Flying Start area, and his family were not in a position to pay for a place in a childcare setting or for the transport to get to the nearest Cylch Meithrin. In the therapist's professional opinion, financial help for the child to be able to attend Cylch Meithrin or nursery (under an eligible age for the Childcare Offer) would be an effective intervention to encourage them to use language and develop their communication skills whilst playing. This exemplifies the need to reconsider eligibility on the basis of the child's need, rather than the parents'

eligibility to receive the Childcare Offer, and yet again underlines the crucial role of early intervention and childcare and education settings with regards to preventing difficulties from worsening or developing into a disability. We believe there is work to be done to promote and give status to the work that childcare and education practitioners do to facilitate interventions to support children at an early age.

One practitioner described the tension of wanting to accept a disabled or neurodivergent child, but not having the support available at the setting because the child was not eligible for the Childcare Scheme:

'If a child does not accept the childcare offer, unfortunately there is no support for these children. I understand they don't have to attend but if social services get in touch and ask us to take these children, or if parents ask us to take them so they can have a little bit of a break, it's our responsibility to make sure that all children are treated inclusively'.

The Cylch leader added here that she had paid for additional staff from the Cylch's budget when their funding request was rejected, and that the Cylch had purchased special resources to meet the child's needs.

Several practitioners reported that the ability of the setting to support an individual child too often depends on the financial situation of the nursery or Cylch:

'In our case we do have money but if some nurseries don't then some children with ALN could be excluded due to lack of funding and not being a part of the 20 hours free childcare'.

Some reported that financial help is not available to enable a disabled or neurodivergent child who needs support to attend wraparound provision.

Staff recruitment was an issue that was noted by almost all Mudiad Meithrin support staff as a factor preventing settings from offering fair access to disabled and neurodivergent children. It has been a challenging time with regards to recruiting staff to work in childcare and education settings, and an even greater challenge if the only funding available is for extra hands for a few hours a day:

'We struggled to fulfil 1;1 position as it was only 2 hours per day.'

Even if a recruitment drive was successful, there was a feeling among respondents that there was a shortage of suitable staff with expertise:

'We are doing everything we can to ensure that all children receive the same care, but sometimes we find this challenging, as getting one-to-one

support for a child with needs can be difficult, with no expertise among relief staff and the resources are scarce as well'.

One practitioner proposed a solution to address the lack of expertise and the recruitment challenge locally:

'Perhaps a pool of staff with qualifications and experience to offer the best care to ALN children would be beneficial. Not everyone has the skills to cope with the challenges.'

It should be acknowledged, though, that the reason why the supply of pool staff is often problematic is because the staff are offered jobs that are effectively permanent jobs (such is the demand).

Professional Advice

Practitioners say there is not enough expert advice available to equip them with the knowledge on the best way to support a disabled or neurodivergent child. They say that experts are needed to visit settings and provide advice, guidance, and ideas about suitable activities and resources.

One Cylch Meithrin reported that a child with a lack of speech, language and communication development had been identified as having ALN by the Local Authority. Despite having an IDP that lists the additional learning provision, the Cylch Meithrin leader said no one had visited the Cylch to offer guidance and suggestions regarding interventions to be piloted in the Cylch. The practitioners have come to know the child and build a relationship with him, but feel that they have not been given more expert guidance to be able to support him in the most suitable way.

This expertise is not expected from the Cylch, and practitioners are well aware that professional individuals, such as speech, language and communication therapists, are busy and find it difficult to see every child. Given that early intervention is emphasised as an important strategy to prevent any needs or difficulties from developing, it must therefore be ensured that the right advice and guidance is given to the practitioners dealing with the child on a day-to-day basis.

We support the Welsh Government's plans to have a cross-policy emphasis on speech, language and communication and the intention to upskill the workforce through the *All Wales Speech, Language and Communication Training Pathway For all childcare practitioners working with children aged 0 to 4 years*

11 months⁶; Mudiad Meithrin ran a course equivalent to a core level of skills expected of all early years practitioners. From the responses gathered from practitioners, and the particular emphasis on guidance on issues relating to this area, it is unclear whether the training is available to practitioners locally and if it is available through the medium of Welsh, which is essential for the workforce of Cylchoedd Meithrin and Welsh medium and bilingual nurseries.

Training and Resources

There was agreement in the responses that a variety of training was required for different aspects and levels of additional learning needs. From the responses, it is clear that Cylchoedd are adapting overall provision to respond to the needs of individual children; e.g. several mentioned creating calm/sensory areas, adjusting times to create quieter times in the setting. There was a willingness to invest in resources and pilot new resources:

'Last year I had four children with IDPs but I had to buy new resources like a sensory tent, etc., so I think it would be useful for some funding towards resources. Also staff training - we have all been on a Makaton course...I think courses on behaviour, autism and ADHD would be useful as well.'

While there is a willingness to make required adjustments to meet the needs of each individual child, costs associated with this can be difficult for Cylchoedd that are already under financial strain:

'We had to replace everything that had magnets in it, which is hard in our setting without much funds'.

Some practitioners identified the need for more guidance on providing for children with ALN in the context of expectations of 'Assessment arrangements for non-maintained funded nursery placements'. One practitioner reported that it wasn't possible to place all the resources that were supposed to be available to children and to incentivise free and child-led play, as some children with specific needs are at high risk if they would grab scissors or eat clay or paint.

Guidance should be offered to practitioners about assessment arrangements for a child with needs or difficulties, to ensure that they are assessing in a way that suits the child.

⁶ [Talk with me: all Wales Speech, Language and Communication \(SLC\) training pathway tool | GOV.WALES](#)

Locations not funded to provide education

Some non-funded, non-maintained nursery settings said they feel that they do not have the same opportunity to access training from the local authority as the offer is open to settings funded solely to provide education:

'Although we offer wraparound care, we are not offered the opportunity to attend ALN courses by the local authority as we do not provide Flying Start or education. There should be support for EVERYONE who works and looks after children, and also our club should receive information if a child has ALN or IDP / one page profiles etc.'

The same practitioner reported that a lack of information sharing about an individual child has led to confusion and inconsistency in the provision for that child, as he attends school as well; although the child was receiving social services support due to his intensive needs and attending another nursery setting as well, the practitioner felt that there wasn't adequate collaboration between everyone in the child's best interests.

This section has scrutinised the main issues of concern for settings when trying to offer equitable access to disabled and neurodivergent children. The main calls from this section shall be listed in Section 5.

Section 3: Additional Learning Needs (ALN) Code

'Local authority funded non-maintained providers of nursery education have a role in supporting local authorities to identify ALN and in helping local authorities to fulfil their statutory obligations. (1.85 ALN Code 2021).'⁷

This is the duty that has been placed upon nursery setting providers in the current ALN Code. From the responses received through the questionnaire, it can be inferred that practitioners' level of understanding is inconsistent across Wales. When the Code was published, Cwlwm asked the Welsh Government for clearer messages or guidance on how providers are expected to support the local authorities – what would that look like? The concern was that each local authority would offer different ways, rather than consistency across Wales. It was said that a number of local authorities have been misleading nursery settings with messages that go against the Code; e.g. practitioners are expected to create an IDP, organise multi-agency meetings, or attend detailed courses that are beyond the duty imposed on them in the Code.

There has been an attempt to address the mixed messages by putting together a blog on the Cwlwm website⁸ - a text approved by the Welsh Government. We no longer believe that this is sufficient, and therefore the Government should give concrete examples of what providers are expected to do under the duty imposed in the ALN Code. More concrete guidance would help providers understand what is expected of them, along with consistency across Wales, and would help to understand what is considered good practice for providers.

One of the main aims of the current ALN Code is to facilitate early intervention, but in order to do so successfully it is necessary to make sure that the right support is available for the child in the nursery setting. It is clear from the responses we have received from practitioners that they do not believe they have the appropriate tools to meet the child's needs, whether that is funding to offer more support in their provision and ensuring that the ratios are accurate or expert advice and training to understand how to support the individual child. This occurs in a context of great financial pressures on nursery settings and a crisis with regards to recruiting staff – particularly staff with experience of supporting children with ALN – and therefore it is understandable that there is pressure on practitioners to try to meet a child's needs under very challenging conditions.

⁷ [The Additional Learning Needs Code | GOV.WALES](#)

⁸ [Additional Learning Needs \(ALN\) Act and Code | Cwlwm](#)

Section 4: Support through the medium of Welsh

Pupil Level Annual School Census (PLASC) data provides a picture of the number of school pupils with ALN.⁹

We used data on the number of pupils in school language categories (dividing the numbers of pupils in bilingual or two-stream schools by two) to obtain an estimate of the number of pupils in the Welsh sector and the number of pupils in the English sector. In this way, it was possible to calculate the percentage of children in the Welsh and English sector and all pupils with ALN in 2021-22:

All ALN pupils % of all pupils	All ALN pupils % of the Welsh- medium sector	All ALN pupils % of English medium sector
14.85	15.90	14.59

Although this number is an estimate, it is good to see that the percentage of children with ALN in Welsh medium schools and receiving the majority of their education through the medium of Welsh is close to the percentage of ALN pupils receiving English medium education, and the percentage of all Welsh pupils with ALN. Therefore, by this estimate, there appears to be equitable access for children with ALN in Welsh language education.

When scrutinising the percentages for some local authorities, a greater gap is noticeable between the percentage of pupils with ALN in Welsh-medium education and those in English-medium education:

	All ALN pupils % of all pupils	All ALN pupils % of the Welsh medium sector	All ALN pupils % of the English medium sector
Neath Port Talbot	19.19	11.86	20.66
Bridgend	8.25	3.46	8.65
Vale of Glamorgan	10.44	5.66	11.19

From what we can see from the public data, it looks as if there is a gap in these counties and further research may be required to see if and why the gap exists.

⁹ [Pupil Level Annual School Census \(PLASC\) \(gov.wales\)](https://gov.wales/pupil-level-annual-school-census-plasc)

Mudiad Meithrin welcomes the recent publication by the Welsh Language Commissioner and the Children's Commissioner for Wales which emphasises the need to review and address the lack of Welsh-medium ALN provision.¹⁰ We agree that a full review of the current ALN provision is needed and that the information should be used to update local authorities' Welsh language strategic plans. We welcome the new Working Group which will scrutinise the current situation and prioritise work that needs to be done to level the playing field for children who need the provision through the medium of Welsh.

We also support the call for proposals to be developed on collaboration arrangements between local authorities. One of the challenges with Welsh language provision in the early years is that there are not enough Welsh-speaking health experts, which is one of the weaknesses of Welsh-language provision in the field of disabilities and neurodivergence in general. This has a direct impact on the choices of parents and carers:

'They are attracted to English childcare because there is more specialized provision available (given that there are more providers). Places with specialities are not usually available through the medium of Welsh.'

Speech, language and communication therapists were cited as a specific example of a professional group where there is a shortage of Welsh-language users:

'Many still get the advice that a child with needs can't cope with two languages! There is a shortage of professionals (e.g. speech and language) who can work through the medium of Welsh.'

We believe there is still work to be done to show parents and carers, as well as the health sector, that children with ALN can flourish in Welsh-medium education.

Section 5: Key calls to ensure equitable access to childcare and education

We call on the Welsh Government to:

- Ensure that financial support is available to childcare and education providers based on the child's need and the setting's ability to meet that need.

¹⁰ [Commissioners join forces to call for improved provision in the delivery of learning needs through the medium of Welsh \(welshlanguagecommissioner.wales\)](https://welshlanguagecommissioner.wales)

- Ensure that local authorities ring-fence money to support disabled and neurodivergent children to gain equitable access to childcare and education during school holidays and wraparound care.
- Offer clear guidance on the expectations of funded childcare providers under the current ALN Code.
- Early Years ALN Lead Officers to ensure that experts provide advice and guidance to nursery settings to improve their understanding of how to support a child.
- Invest in upskilling a proportion of the childcare workforce to be able to support children of disabled and neurodivergent children and raise the status of the role childcare practitioners can do to help early intervention in accordance with the ALN Code.
- Promote the benefits of Welsh language education for families of disabled and neurodivergent children as well as the health sector.
- Review the provision of Welsh-medium nurseries for children with Autism.