

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 50

Ymateb gan: Coleg Brenhinol y Therapyddion Lleferydd ac Iaith

Response from: Royal College of Speech and Language Therapists

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

- **Implementation of the new Additional Learning Needs (ALN) system and the effective transfer of learners from the existing Special Educational Needs (SEN) system.**

As we enter the final term of the third year of the implementation of the ALN system the impact of the system has been felt by NHS Speech and Language Therapy services across Wales.

Consistently, NHS Speech and Language Therapy services have reported that they have had the highest number of ALN requests, both statutory and non-statutory, of any other Health service in their Health Boards. Whilst NHS Speech and Language Therapy services recognise the value of joint working with schools and Local Authorities to support children and young people, the requests under ALN have been in addition to increased referrals and the need to provide services to all children and young people.

Feedback gained by one NHS Speech and Language Therapy service in the first year of implementation indicated that NHS Speech and Language Therapists found the opportunity to participate in the person-centred planning (PCP) meeting to develop the IDP was very beneficial. The NHS Speech and Language Therapists identified that they felt they had a valuable contribution to make to ensuring that intended outcomes were developmentally appropriate and achievable, when they related to speech, language and communication skills. It is therefore disappointing that in several Local Authorities, the decision has been made for the setting of intended outcomes and the writing of the IDP to be completed outside of the PCP meeting with no contribution from Health professionals or parents. This practice feels like it is in opposition to the principles of the ALN system of shared identification of need and support., a co-produced IDP.

As the implementation of the ALN system has progressed, NHS Speech and Language Therapy services have experienced an increase in the requests from Local Authorities to support them in disagreement and dispute resolution and in

Education Tribunals (ET). Across Wales, NHS Speech and Language Therapy services value the joint working with Local Authorities and make every effort to support our partner services. More recently, some NHS Speech and Language Therapy services have seen an increase in requests from Local Authorities to provide assessments for Education legal proceedings for children and young people who are not known to NHS Speech and Language Therapy services. These requests have often been when there is no or limited impact on the child or young person's speech and language skills and a referral to NHS Speech and Language Therapy is not indicated. These requests are at odds with the request of the NHS Act to provide intervention when there is an impact and only intervention by Speech and Language Therapy can reduce the impact. NHS Speech and Language Therapy services already experience demand which exceed the capacity to provide and, in many cases, do not have the resource to be able to provide assessments where there is no indication of clinical need. The principle which allows section 2C, which is the identification of NHS ALP to be appealable to ET, put Local Authorities in the difficult position of having to respond to provision for which they have no authority over.

Across NHS Speech and Language Therapy services there is already a significant amount of work supporting children and young people prior to them being in the ALN system. The ALN system needs to compliment this and use the communication and collaboration already established to ensure these services are accessed. This means that education setting staff should be able to contact NHS Speech and Language Therapy services and that system dictates this. Being able to count how many referrals are made as part of ALN is important but ensuring that education setting staff and NHS Speech and Language Therapists can be in direct communication with each other to collaborate in a timely way is more important.

- **The application of the definition of ALN, compared to presently for SEN, and whether there is any 'raising of the bar' on the ground for determining eligibility for provision.**

NHS Speech and Language Therapy services welcome the significant efforts made by schools and Local Authorities to strengthen their support for speech, language and communication skills as part of high-quality teaching. This recognition that children and young people's speech, language and communication skills can be supported throughout the learning day has meant that children and young people have not required IDP's to access the support they need. NHS Speech and Language Therapy services have contributed to the knowledge development of school staff by providing open access to training and direct routes of contact with services to provide general advice and support.

The strengthening of the school-based support for speech, language and communication needs has resulted in ALN system being used for children and young people whose support needs are over and above what is ordinarily available in mainstream school.

- **The professional learning and other support settings are receiving to ensure effective implementation of the Curriculum for Wales and the ALN system.**

NHS Speech and Language Therapy services, along with other NHS Health services have received limited central training on ALN from the Welsh Government. All training has been provided within Health Boards, either within services or from the DECLOs. Whilst the training has been adequate to meet local needs it has not always provided a broader perspective on the Welsh Government's view of NHS professionals' role under ALN.

- **Other factors potentially affecting implementation of the Curriculum for Wales and the ALN system, for example levels of funding and fall out from the pandemic.**

The ALNET Act places a statutory duty on all Health Boards to have a DECLO in post, who has responsibility for the implementation and statutory compliance with the ALN system by NHS health professional. However, the DECLO role is the only funded role and, in some areas, the DECLO is an isolated role with no team to support the operationalising of the act and compliance with statutory duties, as a result this falls on the services to complete this work. NHS Speech and Language Therapy has identified an increase in workload for service leads to collate data, monitor statutory duty time frames, quality assure identification of NHS ALP and work with schools and Local Authorities on disagreement and dispute resolution. If the DECLO was to have a funded team, they would be able to complete this new activity.

In some areas, there has been a push for some local authority services to work at statutory level only, eg. support for d/Deaf children and young people, children and young people with vision impairment and children with speech, language and communication needs. There is a huge amount of support that can be provided by education setting staff regarding speech, language and communication needs if they have appropriate skills and training (which is not given during initial teacher education). If all this work is delivered at a statutory level then it is not supporting children and young people at an earlier stage and will lead to even more children and young people having IDPs for speech, language and communication needs, already the largest category of ALN. There has to be appropriate support prior to statutory level for these children so their needs can be met appropriately.