

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 54

Ymateb gan: Undeb Addysg Cenedlaethol Cymru

Response from: National Educational Union Cymru (NEU)

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

- Implementation of the Curriculum for Wales in early years settings, primary schools, and secondary schools.

“Experienced staff are struggling, new staff are drowning.”

NEU Cymru member

Members tell us that implementation of the Curriculum for Wales is variable, and depends largely on your school and setting, but varies across departments, schools and counties. Whilst the curriculum remains a huge challenge, it is compounded by the Additional Learning Needs and Education Tribunal (Wales) Act (ALNET Act), and all the workload implications which remain. More INSET days are needed which allow education professionals to focus on the curriculum, including working within and across settings, sharing good practice, and embedding inclusive education techniques. Members tell us that there is little time for reflective practice, which is critical to the “Self-improving system”.

The Pioneer schools network could help support schools at this point who are still on their Curriculum for Wales journey, but they no longer seem available to offer support.

Primary

In primary settings one of the main challenges to implementing the new curriculum remains time. For primary schools this is a complete change at every level, and there is insufficient time to teach children and plan an entire new curriculum, whilst working with colleagues and other schools.

Secondary

We hear from members in secondary settings about having to teach multiple schemes of work, as they are still unsure what the new exams system will look like. We set out more below on the exams system, but it is worth noting that members are especially concerned that the expectations in terms of qualifications are not already available. Members also highlight there will be a point when they are teaching two lots of exam curricula, which will have huge implications for workload.

Whilst our members do not want to teach to the test, an idea of what the qualifications system will look like at the end would help ensure that schools are giving learners the best opportunities to learn broad but relevant content and skills. As we do not know the final shape of GCSEs, this could mean students having to cram extra work into the final years of their schooling.

Consortia

Members tell us there is variable support from the consortia. They also are finding the idea of 'innovation' a challenge, and being given examples which are not supportive or relevant to their school. There has been limited support across the range of subjects delivered in schools with consortia mostly supporting core subjects.

- The level of consistency and equity of learning opportunities for pupils across Wales, given the flexibility for schools to develop their own curricula within a national framework.

The way in which the curriculum is constructed inevitably means there will be different curricula across Wales. Our members would like to see some consistency in terms of guidance and support, so that children moving between settings would have some shared experience with their peers – for example moving between primary and secondary phases.

Whilst there is time for reflection in some schools, built in through inset, there is limited time given to refine Schemes of Work (SOW) and resources to support teaching and learning. The workload implications to developing SOW, termly overviews, inclusions of literacy, numeracy and the Digital Competency Framework, and the teaching and learning resources with exemplar material has been, and still is, challenging. This is because the normal demands of the school year are still in place, nothing has been removed to decrease workload and no workload impact assessment has taken place to monitor the growing tasks teachers and middle leaders have to carry out each day with only 10% PPA.

As stated above, support across schools and counties is hugely variable, and needs to be appropriate for individual settings and cohorts, to ensure the curriculum can deliver on its aims.

- The associated reform of qualifications to align with the Curriculum for Wales.

Minister's aims of "Achieving high standards and aspirations for all¹, as set out in his Bevan Foundation speech last year, are welcome by our members. However, comprehensive reform of the qualifications system is needed in order to achieve these aims. The new curriculum allows us in

¹ <https://www.gov.wales/bevan-foundation-high-standards-and-aspirations-all>

Wales to reform the qualifications system, so that it delivers for learners and suits the new curriculum.

The work of the “Forgotten Third Commission²” and the “New ERA” Assessment Commission³ underpin our perspective. Both reports clearly set out that high stakes accountability is not working for all young people. With the premise of the GCSE as a general qualification, replacing a two-tiered set of qualifications (O Levels and CSEs), we are concerned that the current proposals could alienate those young people who will not achieve the much-coveted A–C GCSE grades. We are keen that GCSEs remain a qualification for everyone.

Our members believe that any plans to reform the qualifications system must have equity at their heart:

- i) The current norm-reference system rations success and stifles creativity.
- ii) High stakes standardised terminal assessments are exacerbating the mental health crisis amongst learners.
- iii) The current system disproportionately provides an advantage to pupils from more affluent backgrounds who can be ‘coached’ to succeed in an exam.
- iv) Moderated teacher assessment is an accurate form of assessment and can reduce overall teacher workload if implemented correctly.
- v) The ‘inflated grades’ issues from 2020/21 is a product of the prescriptive nature of our curriculum which encouraged learners to learn narrow specifications and mark schemes.
- vi) Our members are clear that the use of the algorithm should end, as it prevents everyone achieving success.

The current timelines for changes to the qualifications system are a concern. The GCSEs feel rushed at this stage, and yet Welsh Government

² <https://www.ascl.org.uk/Our-view/Campaigns/The-Forgotten-Third>

³ <https://www.neweraassessment.org.uk/>

have had plenty of opportunity to reform GCSEs. Whilst Qualifications Wales appear to have moved some way towards non-exam assessments (NEA), which is to be welcomed, the vocational qualifications will not be ready at the same time as the GCSEs.

Whilst exams have specifications to aid delivery, there is still significant workload implications for teachers and middle leaders, ensuring appropriate equitable SOW and all teaching and learning resources are in place, if there are changes to be made there needs to be dialogue with practitioners to ensure the new qualifications are fit for purpose.

If GCSEs are truly to be suitable to everyone, as they were intended, we need to ask why the two separate forms of qualifications are needed? In fact, ahead of the Senedd elections our members called for a national conversation on qualifications⁴, if we are going to get this right it is better that we do it once, and do it well, to ensure that every young person in Wales has a record of what they can do.

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

We welcome the Minister's delay to implementation⁵ of the transition to the ALNET Act, however, ALN reform remains a huge concern for members. It is worth noting that our members would have wanted one year per a year group to complete the transition to the new system, as Individual Development Plans (IDPs) are taking 7 hours on average.

⁴ <https://neu.org.uk/neu-cymru-manifesto>

⁵

<https://www.gov.wales/written-statement-additional-learning-needs-and-education-tribunal-wales-act-2018-implementation>

NEU Cymru supports the principles behind the Act, including involvement and timely support. However, “early, timely and effective interventions”⁶ are only possible if there are education professionals there to support them – not spending precious time completing paperwork, when they could be supporting children and young people.

As we highlight below, the 18,000 fewer students recognised as having ALN is a direct result of the Act. If those children are to be fully supported, questions should be asked about how we are ensuring those children have access to support to enable their learning, as they are now ‘lost’ to the system.

- 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.

The Welsh Government’s School Census from last year (most recent available) shows a drop of around 18,000 pupils⁷ between the two systems, and states that:

“Schools were also asked to stop using the ‘General learning difficulties’ category and to reassess an appropriate category of need for such pupils.”⁸

Yet these children still need additional support.

Our members believe local authorities (LAs) should have clear responsibilities and should not be able to pass decisions back to schools and instruct them on what ALN to provide, without clear support, including

⁶ EM 3.3 <https://www.gov.wales/sites/default/files/publications/2018-04/additional-learning-needs-and-education-tribunal-wales-act-2018-explanatory-memorandum.pdf>

⁷ <https://www.gov.wales/schools-census-results-february-2022-html>

⁸ Ibid

financial assistance. This places too much power in the hands of local authorities.

LAs need to be part of proactive solutions for children with ALN and help provide the Additional Learning Provision (ALP) which schools alone cannot, rather than simply determining that a solution must be found by schools. Working more collegially to find a solution would help fulfil the aims of ALN reform.

We believe a shorter non-statutory plan for those children who do not have an ALN, but may need some extra support in school, including for behavioural issues, would be a benefit to children and their parents to know what support they are having, whilst freeing up teachers from writing lengthy IDPs.

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

Training

Better training is needed on the new curriculum and ALN system for everyone across education – including teachers and support staff. Whilst there are some pockets of good practice, members tell us that everyone has not had access to the training they need to embed the system within schools.

Members tell us they need more training on completing IDPs, and are very conscious they are a legal document, which they believe should be completed by someone with legal training.

Members especially tell us that they need more training on inclusive teaching, so they can ensure that the “holistic provision” they provide caters

for a range of learning needs across their classes, which is an aim of the Curriculum for Wales.⁹

For the curriculum, training has been limited and time is needed to embed new approaches to support every learner. More time for training and reflective practice are needed to ensure the aims of the reforms are fulfilled – extra INSET days are not enough.

- 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.

Funding

Our members tell us that there are variable funding arrangements in place across Wales, in order to access support for children with ALN. A small number of members tell us that schools are being well supported with requests for support for children with additional learning needs, whilst others tell us there is pressure to save money.

Funding should be clear, and universal access to specialist support services is critical to help identify a child's needs and the right provision for them should be available to all schools.

Furthermore, if a teacher decides (and it is their duty to 'decide' within the Act) that a child with ALN needs certain ALP, then it should be for the local authority to fund. We cannot have a situation where schools are disincentivised from identifying a child's additional learning needs.

Absence levels

Absence levels in education remain high and have not returned to pre-pandemic levels¹⁰. Children eligible for free school meals (FSM) and those in

⁹ <https://www.gov.wales/schools-census-results-february-2022-html>

¹⁰ <https://www.gov.wales/attendance-pupils-maintained-schools-5-september-2022-31-march-2023>

Year 11 remain of particular concern. Coupled with challenging pupil behaviour since the pandemic, absence levels should be an absolute national priority.

We have welcomed that the Minister has employed family liaison type posts as part of the community focused schools' initiative, but at this point absence should be a huge priority. We cannot implement such sweeping reforms without getting some of the basics right – we need children to want to come to school, otherwise the aims of the curriculum cannot be fulfilled.

ALN reform and especially a lack of duties on health are hugely problematic here. Children need the right support at the right time in order to fulfil their potential. Members tell us that a duty to make a decision without the input of health and local authority services isn't working, and health should be compelled to provide information to inform deciding on an ALN and providing ALP in a consistent and timely manner.

For some young people, their learning needs are hugely impacted by their medical needs, and schools alone cannot support children without input from health – including the vital support of Child and Adolescent Mental Health Services (CAMHS), which needs to ensure it is able to deliver timely support to our children and young people, in order to help them access their education.

It seems puzzling to our members that England has Education and Health Care Plans (EHCPs)¹¹, but there are no significant duties on health in Wales, despite the NHS having significant resources, when compared to schools and colleges.

¹¹ "Section 42 of the Children and Families Act 2014 creates a legal duty on the CCG to ensure that health care provision specified in the EHC plan is made available to the child or young person."
<https://councilfordisabledchildren.org.uk/sites/default/files/uploads/files/Health%20duties.pdf>

We are also concerned that the national database of children in Elective Home Education, which was first proposed as a response to the Dylan Seabridge case, has yet to be enacted. We believe it is critical that local authorities know where children are, and that they have opportunities for learning – in line with the United Nations Rights of the Child. We believe this database could help have a clearer picture in terms of absence levels amongst pupils, and the types of pupils who are missing school.

Estyn

Members remain concerned that Estyn needs to focus on wellbeing of both staff and pupils alike, as the system is still recovering from the pandemic. Schools are in need of support with both the new curriculum and ALN reform – they do not need judgement on these from Estyn. More generally, whilst Estyn’s approach at a Wales level is often welcomed, individual inspections vary greatly, and still cause serious anxiety for our members.

- The particular challenges and opportunities facing different types of schools in varying circumstances (e.g., language medium, demographics and locality) in terms of implementing curriculum and ALN reform.

Recruitment and retention

Welsh Government need to do more to make teaching a more attractive profession. Secondary teacher training places have not been filled for the last 7 years. For primary, targets have only been met once in 6 years.¹²

Of those leaving teaching in 2021, nearly a quarter (23%) were in their first 5 years of teaching, while a third (37%) were in their first ten years.^{13 14}

¹² <https://www.gov.wales/sites/default/files/statistics-and-research/2022-05/initial-teacher-education-september-2020-august-2021-052.pdf>

¹³ <https://stats.wales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/teachers-and-support-staff/school-workforce-annual-census/teachers/teachersleavers-by-subject-yearsexperience>

¹⁴ [School Workforce Census results: as at November 2021 | GOV.WALES](#)

We currently have a shortage of teachers able to teach Welsh as a subject, and other subjects through the medium of Welsh, and any disruption and change to the current system could exasperate this.

Whilst we have seen the teacher:pupil ratio drop as a result of the “Recruit, Recover, Raise standards” funding¹⁵, this was a temporary fix to a significant issue, and had a knock on-impact to the availability of supply teachers – with members telling us they have had to stand in to cover lessons at short notice.

The OECD review, “Achieving the New Curriculum for Wales”¹⁶ discussed recruitment and retention patterns in Wales. It mentions that workload and the status of the profession are two common issues in recruiting new teachers and retaining experienced in Wales, together with localised issues which include the Welsh language and specific subject areas. The report also noted 85% of Newly Qualified Teachers (NQTs) start their careers in fixed-term or supply positions. This has a major impact on the NQT’s induction year.

Whilst we have settled the pay dispute for 2022/23 and 2023/24, the workload element of that dispute will be hugely important. The letter which sets out what the WG are aiming to do to support workload for education professionals (dated 24th February) is hugely important, and WG must focus relentlessly on making sure that the workforce have every reason to stay and do the jobs they love – and getting curriculum roll out and ALN reform right are critical to this.

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¹⁵ <https://www.gov.wales/schools-census-results-february-2022.html>

¹⁶ <https://www.oecd.org/publications/achieving-the-new-curriculum-for-wales-4b483953-en.htm>



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Buffy Williams MS
Chair
Children, Young People, and Education Committee
By email

29th April 2024

Dear Chair,

We are writing to you by way of responding to the Children, Young People and Education Committee check-in on education reforms in Wales.

NEU Cymru are concerned that the level and pace of reform is creating an unsustainable level of workload for our members working in education – which is having a detrimental impact on recruitment and retention. Indeed, it is clear that teachers need a fully-funded, above inflation pay rise, in order to prevent them leaving the profession.

We stand by the issues which we highlighted last year, and have reattached our response for your information.

Whilst we support the principles of the Curriculum for Wales, the workforce needs to have clear direction in terms of the priorities which the system requires. Currently, there is too much guidance and not enough clear information about what is expected from teachers, leaving them to have to start from scratch on curriculum design, without a clear idea on assessment and qualifications. More clarity is needed.

We have set out some specific areas of concern below.

Workload

Following NEU Cymru's strike action last spring, the Welsh Government embarked on a series of workload negotiation meetings, which we welcomed.

This work remains ongoing, and we are represented within the various workload groups. However, it is critical that the actions from the Welsh Government now move at pace, to ensure that those in our classrooms see a decrease in their workload.

As the level of reforms continue, it is clear to us that our members need time outside of the classroom to plan the new curriculum. PPA time should be set at a minimum of 20%.

Additional learning needs reform

We support the recommendations of the ALNCo Task and Finish group.¹ It is critical that these recommendations are implemented as soon as possible.

Additional Learning Needs Coordinators (ALNCoS) need time outside the classroom and extra support to deliver the expectations of ALN reform and the ALNET Act in particular. Without access to extra time, they cannot sustain the level of support for children with ALN, including Individual Development Plans (IDP) which they are expected to undertake.

The Act passes responsibilities down to the ALNCoS from local authorities, without any additional support or resource; and allows local authorities to direct schools. Duties on health bodies (such as health boards) to support IDPs are must be included in the Act – currently ALNCoS must make a decision about a child without necessarily having the relevant information.

This is unsustainable. ALNCoS need time, support and sufficient funding to support children with ALN.

The middle tier review

NEU Cymru has welcomed the Welsh Government's review of the middle tier – long called for by our members. As the next phase of the middle tier will likely see the consortia reimagined as local partnerships, it is critical that the focus is on support for schools, and that the changes do not create additional workload for leaders and teachers.

¹ <https://www.gov.wales/alnco-task-and-finish-group-report-minister-education-and-welsh-language.html>

Any additional workload which is created, must be accompanied by clear direction of what teachers and leaders can stop doing, because any increase in workload is unsustainable.

Qualifications reform

Further to our comments last year, it is imperative that qualifications reform does not increase teacher workload.

We have welcomed an increase to non-exam assessments (NEA) for the new GCSEs, but are concerned that this should mean a use of multi-model assessment, rather than a narrow interpretation which relies heavily on in-class timed assessment, as it does now.

We have been engaged with Qualifications Wales and the WJEC on qualifications reform, and as with other large pieces of reform, it is critical we get this right for students and staff alike; setting out what teachers can stop doing, if their workload is to increase, whilst making sure young people leave school with a record of what they can do. Please see our attached paper, we shared with WJEC, which we wrote with the Universities and College Union (UCU).

We look forward to engaging with the Committee on these vital issues.

Yours sincerely,

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