

# Implementation of education reforms: 3<sup>rd</sup> check-in

## Summary of findings from school visits

Summer 2024

This report sets out a summary of the findings of the Children, Young People and Education Committee's visits to schools during the 2024 summer term.

The report consolidated the findings of four separate visits carried out by members of the Children, Young People and Education Committee to the following schools:

- Llangatwg Community School in Neath (25 April)
- Ysgol Gyfun Cwm Rhymni, Blackwood (25 April)
- Sandfields Primary School, Port Talbot (25 April)
- Ysgol y Deri, Penarth (2 May)

To protect the schools' anonymity this summary report does not attribute any comments to any individual school unless we have received their explicit consent to do so.

### 1. The Additional Learning Needs (ALN) system

Overall, we heard positive feedback about the ALN Act's policy intention. However, we heard confusion about how to apply the definition of ALN, and concerns over



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the implications of the Act for staff capacity and funding. This has meant that not all pupils on schools' old SEN registers are being recognised as having ALN and given IDPs under the new system. We also heard consistent concerns about the level of support offered to schools by health bodies, whose input is critical to the education of certain pupils.

## **Moving from the SEN system to the new ALN system**

### **The transition**

We heard consistently that, during the transition, ALNCoS needed to spend a lot of time speaking to families of children who were on the old SEN register to discuss their children's needs, whether those needs could be met via differentiated teaching, and, if not, what additional provision the school should provide.

A number of schools told us that it is very time-consuming to write each IDP and disseminate it across relevant members of school staff. The workload associated with each IDP is far in excess of the workload associated with a child on the SEN register without a statement.

Ysgol y Deri told us that all of its pupils have IDPs that are maintained by the local authority. The IDPs are written by the school. To help with this volume of work, the school has employed someone with legal knowledge of the Act who helped convert all the statements of SEN under the old system into IDPs. They have also helped train staff to understand their roles under the Act.

### **Staffing**

All the mainstream schools we visited had increased the capacity of their ALNCo/ALN team to cope with the extra workload arising from the new ALN system. One school has 2 ALNCoS: one full-time non-teaching ALNCo, and one part-time (teaching) assistant. Another has a team of ALN specialists, including an ALNCo, a Deputy ALNCo and various teaching assistants. One explained that there needs to be time side aside for regular meetings for school-based IDPs on an ongoing basis. This places a huge demand on staff time.

Two of the schools we visited told us that more work needs to be done to give schools the flexibility they need to fairly remunerate different types of staff who are working within ALN teams, such as:

- ALNCoS who are entirely out-of-class.
- Support staff (teaching assistants) who are providing specialist ALN support to the ALNCo.

We heard calls for more training on the new ALN system. A number of schools argued that more dedicated training time - like INSET days - would be hugely beneficial for staff. One school reflected positively on the approach taken in

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Northern Ireland, where schools may take up to 10 INSET days during the 2024-25 school year for the purpose of staff training.

## Resources

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One school explained to us that the increased demand for ALP under the Act, combined with the challenging financial environment for schools, means that the school needs to share provision across pupils with IDPs wherever possible and appropriate. They explained that it would be impossible to give every child with an IDP entirely bespoke provision.

We heard calls for one set of ALN CPD training and one set of resources in the Welsh language for use across Wales. One school told us that there is a plethora of information and training materials for teachers, but not much of it is translated. Learners also need age appropriate books in terms of content, but with reading age tailored to children with additional needs.

## Applying the definition of ALN

A key theme across our visits was that the workload associated with developing, maintaining and implementing each IDP means that mainstream schools do not have the staff time or financial resources to provide an IDP to every child who was previously on the school's SEN register. One school explained that schools have to 'cut their cloth' accordingly.

One school told us that their local authority has set out that any child who is receiving an intervention for over 12 weeks should have an IDP. That would mean that, at this particular school, around a third of pupils would have an IDP, which isn't feasible.

In respect of ALN, the mainstream schools we visited tended to categorise learners into three broad groups:

- **Group 1:** Learners whose educational needs are fully met by the provision that is ordinarily available to all pupils. These learners are not considered to have ALN, and do not require Additional Learning Provision (ALP).
- **Group 2:** Learners whose educational needs are different to the majority of pupils their age, but who do not have an IDP. This may be either because a) they are not considered to have ALN but have other behavioural, social and/or emotional needs, or b) they *are* considered to have a greater difficulty in learning, but the school believes that their needs can be met through ordinarily available provision or 'universal

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provision'. In many cases, learners in this group were deemed to have SEN under the previous system.

- **Group 3:** Learners who have been recognised as having ALN, who require ALP to meet those needs, and who therefore have an IDP. This group includes learners with IDPs maintained by their school, and learners with IDPs maintained by their local authority.

Some of the schools told us that the second group consists of pupils who need extra support to boost their basic skills, such as social, emotional and behavioural issues. We heard from two schools that behaviour problems were often being mistaken for ALN because it can be difficult to distinguish between them.

Overall, schools felt that the quality and consistency of the provision offered to every child – often called ‘universal provision’ – is key to meeting the needs of many children who might otherwise be deemed to have ALN. One school argued that we need time to educate mainstream staff about ALN so that universal provision takes into account the needs of *all* pupils. They told us that teacher training was key to embedding that mentality.

One school explained to us how their local authority determines which pupils have IDPs maintained by the local authority, rather than the school. In general, if the pupil requires less than 25 hours of TA time per week, the IDP is maintained by the school. If the pupil requires more than 25 hours, the local authority maintains the IDP.

## **Support from the local authority, regional consortium and health services**

### **Support from the local authority**

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We heard that different local authorities offer different levels of support to their schools, and that the quality of that support varies too.

Most of the schools we visited were positive about the support they receive from the local authority. One felt that, in general, it receives “high-quality, bespoke support”. Others told us that its local authority provides support in relation to ALN, rather than the regional consortia. They added that they have positive relationships with local authority ALN staff.

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However, one school told us that there is a clear lack of capacity and resources within their local authority. Another observed that, though it had an excellent relationship with its local authority, not all schools in other local authorities do.

One school explained to us that although the school leads meetings about pupils who have IDPs maintained by the local authority, the local authority must be give notice to attend those meetings. The school told us that a local authority representative usually does attend, and are very supportive overall.

### **Support from health bodies**

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Overall, the mainstream schools we spoke to felt that they didn't receive enough support from health bodies. Ysgol y Deri, a special school, was the outlier: they told us that, because of the nature of their pupils' needs, they are generally able to get the health provision they need.

One mainstream school explained that although they don't find it too hard to access support from the children with the highest needs, accessing health input for the "next level down" usually involves much longer waiting times.

*"You have parents crying out for assessment and support, and the waiting list can be so long."*

As a result, they felt that the school had to do work that health bodies should be doing to meet their pupils' basic health needs because the health bodies don't have the capacity to do it.

Other schools agreed, telling us about very long waits for health services, including CAMHS, speech and language therapy and occupational therapy.

One school told us that their health board is inflexible and uses petty delaying tactics to refuse referrals. As a result, to some extent the school has had to become self-sufficient in providing mental health support to children.

One school shared their frustration that, under the Act, schools' referrals for health support have to go via their local authority. This can cause delays. The school felt that the DECLO role doesn't seem to be helping to make that process more efficient.

A few schools told us that they struggle to put in place the right provision for some children with additional needs who have not been diagnosed. One school felt that its staff did not have suitable training to meet the needs of these pupils. Another mentioned the financial pressures of trying to meet the needs of undiagnosed pupils, for whom the school receives no additional funding.

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One head teacher summarised to us that the compromise in the ALN Act (where health boards must decide if there is a service or treatment that would be of benefit and, if so, must secure it) fundamentally isn't working. Health boards tend to say that what schools raise with them are educational issues, and refuse to get involved.

### **Support from special schools**

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Ysgol y Deri told us that they do a lot of work with mainstream schools, offering training to help them with their ALN provision.

### **Engagement and relations with parents**

All the schools we spoke to agreed that the ALN system is more child-centred, and has improved engagement with parents.

However, schools also reported that this engagement came at a significant cost to staff time. One ALNCo told us that almost all parents are taking up the school's invitations to come into the school to talk to the ALNCo and feed into the IDP – which is clearly very positive. The primary purpose of these meetings is to ensure that the ALNCo has time to speak to every family to discuss whether their child's needs could be met via differentiated teaching, and, if not, what additional provision the school should provide. But that has meant that their ALNcos held 190 meetings with parents in the first year alone. He added that there should also to be time side aside for regular meetings for school-based IDPs on an ongoing basis, which places a huge demand on staff time. They added that their parents have generally understood when the school has told them that their child would not have an IDP despite being on the SEN register.

Another school told us that some parents have unrealistic expectations about the extent to which the school can meet the very highly personalised needs of all learners at the same time.

We heard from one school that the new ALN system has become more litigious, contrary to the policy intention. Local authorities are becoming more involved in Tribunal cases, as they and schools do not implement the Act consistently.

### **Transitioning pupils with ALN from primary to secondary school**

Both primary and secondary schools stressed to us the importance of a robust transition process for children with ALN. One school felt that transition meetings should take place for every child, whether or not they're on the ALN register. This is particularly important for those children who have ALN, but do not have an IDP because those needs are being met by differentiating teaching. For those pupils, transition is critical because there is no formal record of the child's needs that can be passed to a secondary school during transition (as there would be if the child had an IDP).

But, overall, we heard that there isn't enough time for transition, either for primary or secondary staff.

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One school spoke to us about the impact of in-year entrants to secondary schools, which means that the ALNCo has to rush to put in place adequate provision with limited planning time.

Another school told us that, fundamentally, the traditional secondary school model, where children move from one class to another, can be fundamentally inappropriate for some children with ALN, making transition very difficult indeed for certain pupils.

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## 2. Curriculum reform

Overall, schools welcomed the Curriculum for Wales, and consistently reported that it provides staff with the freedom to focus on individual children rather than pre-determined age-related criteria.

### Developing a curriculum

Schools reported that under the new curriculum they had moved away from a traditional content-based curriculum to an experience or skills based curriculum.

One school told us that they had designed their curriculum around experiences that they wanted every child to have at the school before they left. The lesson plans underpin those experiences. The school argued that specific subject content is important. But, first, you need to teach children how to learn and how to process knowledge. Without that, they told us, “nothing you teach will stick”.

We heard that the shift to the new curriculum was changing what it’s like to be a teacher. One head teacher said that teachers need to recognise the importance of teaching transferrable skills. Another told us that, in their view, secondary school teachers need to become teachers of skills, rather than just subject specialists.

Ysgol y Deri told us that, as a special school, they follow the progression steps, but at whatever expectations are suitable for the child. The main challenge they have is that many of their pupils have not reached Progression Step 1 (broadly expected at age 5) and some may be unlikely to do so. They therefore have to work at pre-Progression Step 1 levels. They told us that there should be something before Progression Step 1 in the Curriculum for Wales.

We heard from one school that the extra INSET day for curriculum planning was useful, but wasn’t enough.

### Ongoing (formative) assessment

Some schools told us that a challenge under the new curriculum is accurately assessing children’s progress. One school explained that, previously, schools relied on quantitative data to monitor progress. Now, the focus is much more on discussions with teachers and the senior leadership team about individual pupils’ progress. That is positive, and more child-centred, but very time consuming.

Another school told us that assessment and progression are the areas they have struggled with the most. They felt that they hadn’t received enough guidance on these two areas.

Some of the schools we spoke to had purchased progression assessment packages. One was monitoring progression formatively at the moment, but was actively looking at other options.



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## Qualifications

Two schools told us that they are concerned about how the flexibility offered by the new curriculum can possibly align with a fixed, consistent set of qualifications. One of those schools worried that for secondary schools, where GCSE results will continue to be a key performance metric, the whole ethos of the new curriculum might be undermined by schools, inevitably, having to teach to the test.

## Working collaboratively with other schools

Ysgol y Deri told us that they are part of both a local mainstream cluster and a network of special schools. This is useful, but working alongside other special schools can be difficult because of each school's remoteness. The school also told us that although they are aware that there is guidance available for schools, it can be difficult to find in one place. A Curriculum for Wales 'toolkit' for special schools would be useful.

## Links with the ALN system

Some schools spoke about the potential for the new curriculum to allow for greater levels of differentiation from teachers, which means that children who formerly could not access the curriculum, and therefore required additional provision, could now be taught more inclusively.

For example, one school explained that they can now teach a child in year 4 something that would traditionally be taught to a year 1 pupil, because that's what's right for them. That may well mean that they *don't* need Additional Learning Provision, because their needs are being met by the new curriculum.

Another school had established an ALN class for younger pupils, to help them catch up with the other pupils in their age group.

One school felt strongly that, given the interrelatedness of the new curriculum and the ALN reforms, in an ideal world the new curriculum and the ALN reforms would have been both designed and implemented together from the start:

*"A good curriculum should meet the needs of all pupils, including pupils with ALN."*

Other schools told us that implementing both education reforms concurrently was a significant challenge. One stressed that this challenge was particularly acute given the ongoing impact of the pandemic on their learners and their families.

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## 3. Other areas of discussion

### Funding

#### General funding issues

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Some of the schools we visited stressed that funding is a primary concern for the senior leadership team and the governors. These schools told us that their finances are sufficiently challenging for them to need to choose whether to prioritise staffing or resources. We heard that, overall, schools will prioritise staffing.

One school told us that some of their more deprived pupils don't have the basics such as stationery. Some teachers are providing this themselves.

Ysgol y Deri, which is a specialist school with 600 learners aged 3-19 across 5 sites in total, told us that they are relatively well funded due to the specialist provision they provide.. They acknowledged that this is a very significant cost-pressure to the local authority. They recognised that most mainstream schools are struggling financially.

#### Supporting pupils in low-income families

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One school explained to us that over 90% of its cohort is in the most deprived decile. Therefore, provision for pupils whose parents/carers are on certain benefits and who therefore have been eligible for Free School Meals is not considerably different than provision for all the schools' pupils.

One school told us that claiming funding for the Pupil Development Grant now that the school provides free school meals has been straightforward – the numbers come through via a spreadsheet from the local authority setting out which families are in receipt of the relevant benefits.

### Staff recruitment and retention

Concerns over recruitment and retention were raised with us across the four visits.

One head teacher stressed to us that there is a recruitment crisis in education, especially among teaching assistants. They explained that, fundamentally, teaching assistant salaries are much too low, particularly given that they are paid pro-rata. Teaching assistants need other jobs to earn enough. The head teacher questioned the progress of the work commissioned by the Welsh Government on teaching assistants' terms and conditions, suggested that raising teaching assistant salaries is the simple fix that could fundamentally end the recruitment crisis of teaching support staff. The head teacher also advocated moving away from minimum qualifications for teaching support staff in favour of a vocational, experience-based approach.

Some schools discussed with us the challenge of recruiting Welsh-speaking teaching assistants and teachers in particular. One school told us that the situation has got worse since COVID, and argued that teachers are now expected to be able to do much more than teaching to support their learners. They added that the recent closure of Aberystwyth University teacher training course was could make the situation worse.

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Ysgol y Deri told us that the Welsh Government were previously persuaded to allow the graduate entry route to be done in a special school. However, the Education Workforce Council and the Welsh Government have since insisted that initial teacher training must be undertaken in a mainstream school. The head teacher felt this was the wrong decision, had impeded career progression for teaching assistants, and that ultimately all teachers need experience of working with ALN pupils.

## **Teacher workload**

Some schools told us that teaching under the new systems is better for the child – universal provision should be able to support all learners. However, it is much more work intensive for teachers. One head teacher explained that previously you had text books that you'd run through to teach children. Now, teaching is tailored to the individual child. Doing that for 20-30 children, taking into account differentiation, ALN needs, etc., is incredibly challenging.

One school pointed to the amount of administrative work that teachers undertake and the expectations on their time, including the time to deal with complaints from parents, as exacerbating workload issues.

One school that we visited had taken the approach of giving teachers a full day's PPA time per fortnight (rather than a half-day per week), which they can do from home if they want. A teacher at the school felt that this was really helpful because she doesn't get pulled into resolving teaching issues, and has more time to get the non-contact parts of her job done.

One school told us that they have embedded small class sizes across year groups to support children's learning. Teachers have also reported that smaller class sizes has a really positive impact on workload, which is another key benefit for the school.

## **Behaviour**

Some of the schools we spoke to reported an increase in behavioural problems, particularly amongst secondary school-age pupils. One school felt that the pandemic was the primary cause of this increase, while another told us that the rise in behavioural issues predated the pandemic.

We heard that schools are adapting to resourcing issues at a local authority level to provide specialist behavioural support for their pupils.

One head teacher explained to us that the school has its own assessment centre unit, which tries to understand the reasons for the child's behaviour, rather than excluding them. Some of the children who go into the unit come back into the school, whereas other children move into specialist provision.

Another school we visited told us that they had established their own in-house PRU-type provision because there is a shortage of PRU places available in their local authority. This has come at a significant cost.

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## Whole-class approaches to supporting learners

One school told us that they often try to keep children with the same teaching staff as they move up year groups, if the leadership thinks that would benefit the learners. This is particularly effective for supporting children with additional needs, who often rely on the strong relationship with their teacher that they have built up over the year. The school had considered ‘setting’ children for certain subjects, but decided that would separate children from teachers and from the staff who know them best.

One school told us that they had invested significantly in smaller class sizes, which they felt supported all learners, but particularly learners with behavioural, social and emotional needs, including children with IDPs. To provide the extra teacher capacity to accommodate smaller class sizes, day-to-day supervision of the nursery phase is carried out by experienced Higher Level Teaching Assistants (HLTAs), rather than nursery teachers.

## Challenges for families

We heard from some schools that the impact of the pandemic, poverty, and other societal issues are affecting children’s development. One school told us that they are seeing more and more children who struggle with basic, age-appropriate skills. School staff felt that parents aren’t always communicating with their children as well as they could, so many children’s social skills aren’t what they could be. This trend appears to be the case in both deprived and affluent areas.

*“The school has become an extra arm of social services.”*

## School standards

We heard that, in the primary sector, skills underpin content, and skills should be the focus in the primary sector, rather than content and knowledge.

We also heard that a lot of money has been spent on the middle tier of school improvement (regional consortia), with very little to show for it and very little accountability.

## School inspections

School staff and governors felt that Estyn’s inspection framework has not caught up with the change in culture embedded by the new curriculum.

One school spoke to us passionately about the damage of single-word headline judgements from Estyn. The head teacher told us that we should be putting our best head teachers in the most challenging schools, and giving them the time and support they need to succeed. They felt that self-review and peer-review – which they told us could be really honest and constructive – is the way forward.

