

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 69

Ymateb gan: Coram PACEY Cymru

Response from: Coram PACEY Cymru

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### Implementation of the Curriculum:

**General comments:** Coram PACEY Cymru are pleased to be supporting the delivery of training and information relating to the [curriculum for funded non-maintained nursery settings](#) and believe that the early years sector, in particular the non-maintained sector are already very familiar with the ethos of holistic delivery of a curriculum, and with supporting the holistic development of a child. This is a strength of the early years sector which was recognised within the report from Professor Donaldson. The sector, particularly those engaging with their umbrella organisations, Local Authorities and consortia, will be familiar and confident with the delivery of pedagogical practice and may be able to share best practice with other organisations and teaching staff, which will also support professional dialogue. This in turn will support the child's continuum of learning, taking into account their prior learning.

It is heartening that the focus on experiential learning, and the pedagogy of the Foundation Phase is maintained, and it is good to see that the value of play based learning in the early years, and the pedagogy of the Foundation Phase remains strong in curriculum for Wales, which settings seem to be embracing.

Coram PACEY Cymru are pleased to see the curriculum recognised within the most recently published [National Minimum Standards for regulated childcare](#) and that Standard 7.11 sets out the expectation of settings funded to provide nursery education.

Coram PACEY Cymru believe that the shift in focus by Welsh Government towards an Early Childhood Play, Learning and Care framework is positive as part of the wider curriculum reform to ensure it is fit for purpose for the future. The newly published [Early Childhood Play, Learning and Care:](#)

[Assessment Arrangements for 0 to 3 year olds in Wales](#) is a useful resource to support practitioners as they care for and nurture babies and young children from birth, in creating consistent, high-quality, play-based care and learning experiences rooted in children's rights and developmentally appropriate practice that complements the principles of the curriculum for Wales. However, we know that further training, and support is still needed to embed this approach. The development of a consistent pathway through early education and care from ages 0–7, supports a continuum of child development from birth upwards. There is a need for clarity and a joined up approach, there are a significant number of frameworks and guidance documents alongside more formal legislation that the sector are now having to navigate, digest and implement which is causing confusion.

Coram PACEY Cymru believe that positive attitudes towards the Welsh language are needed from the early days of being a parent. The Welsh dimension of the curriculum is welcomed by Coram PACEY Cymru, valuing the importance of children exploring their culture, language, and sense of belonging in their locality in Wales, however we know that there may be some work needed to ensure this does not become tokenistic, that it becomes embedded as second nature to the practice and provision. The introduction of the Cwlwm Welsh Promise has encouraged settings to reflect on their services and experiences provides in terms of Welsh language, cultural experiences, and Welsh heritage. It supports practitioners in embedding the sense of cynefin which in turn builds on their awareness of belonging and identity. Settings have embraced the Welsh Promise positively and have said that it has made them celebrate the Welsh language used within their settings and to realise the importance of introducing the language and culture in the early years which gives a foundation to the love of learning new vocabulary and of Welsh culture.

The development of a consistent pathway through early education and care from ages 0–7, supports a continuum of Welsh language development from birth upwards. To enable this to happen there does need to be a continued investment in the sector to support the development of Welsh language skills to ensure we have confident practitioners who have the knowledge and understanding of how to support the development and progression of Welsh language skills.

Professional Development: Coram PACEY Cymru feel that continued access to current and up to date information, training and resources will continue to be important for all practitioners as they continue to embed the curriculum within their practice. Coram PACEY Cymru recognise that the Welsh Government Foundation Learning Professional Learning Modules contributes to the professional development of the sector, however further support and resources will impact on the success of how the curriculum is interpreted and is put into practice.

For the non-maintained sector Coram PACEY Cymru believes that there should not be an assumption that settings will have an understanding of the curriculum, in particular if they're not funded to provide nursery education. Welsh Government have published the [Understanding Curriculum for Wales and the development of a curriculum for funded non-maintained nursery settings](#) training module which is available to all settings. Further publications this year include: the [Foundation learning video resources: understanding the five developmental pathways and pedagogy](#) and the update to the [Enabling learning](#) resource, all of which have been well-received by practitioners to support with their understanding of implementing the curriculum. However, parity in terms of access to further and ongoing professional learning, is needed to support the quality of provision across the country. This in turn will support children's transition into early education, and support settings to meet requirements within the National Minimum Standards for Regulated Childcare.

### **Assessment Arrangements:**

Coram PACEY Cymru valued being involved in discussions throughout the process of co-constructing the curriculum and assessment arrangements for funded non-maintained nursery settings, to ensure the focus remains in line with the pedagogy and ethos of the previously used Foundation Phase. Coram PACEY Cymru believes there is still a need to offer practitioners the opportunity to walk and talk through the details within the assessment arrangements, and that further training and a professional learning package is needed to help embed this into practice. It is important this is accessible to all, as this would support all practitioners, including those who are not funded to deliver early years education, to ensure parity for all childcare providers and consistency for children. It continues to be too soon to see the impact of the assessment arrangements in particular with home-based

childcare, as there are no settings funded to deliver nursery education and therefore it is not mandatory for them to use the assessment arrangements. Coram PACEY Cymru are still concerned that the number of documents which settings are expected to familiarise themselves with and follow, in terms of adhering to the regulatory requirements, are growing and may be overwhelming for settings. We have seen an increase in additional guidance and self-assessments in recent months, which is causing confusion and anxiety for those who are keen to embrace the newest guidance and information.

**The professional learning and other support settings are receiving to ensure effective implementation of the ALN system:**

Key to supporting equal access for children with disabilities and/or additional learning needs is the skills, knowledge, and experience of the practitioners within the setting. The Self-Assessment of Service Statement (SASS) returns explored whether registered childcare settings have staff with additional/specialist training in supporting children with additional learning needs. This has increased from 50% of all settings in 2020, to just under 60% in 2023 and increased again to just over 60% in 2024. No further statistics are available to date for 2025.

There has also been an increase in the number of childminders which have additional/specialist training from just over 20% in 2020, to just under 30% in 2023 and to 40% in 2024. No further statistics are available to date for 2025. Coram PACEY Cymru feel that access to nationally consistent training and resources is important to support childcare settings with effective implementation of the ALN system in Wales. We understand that the Welsh Government e-learning courses which introduce the ALN system and the ALN principles support this. However, in terms of local training, support, and expectations these can vary, this is reflected in the SASS data. Coram PACEY Cymru have previously raised concerns with Welsh Government regarding different levels of expectations within local authorities in relation to the role of funded early education settings, and non-funded childcare settings, within the local system for identifying and assessing ALN and decision making on interventions, as well as the levels of training that they should complete. We would suggest that training should be appropriate to the role of the practitioner and setting, otherwise this adds to the burden on

practitioners and causes unnecessary confusion. We feel the priority for training should focus on their role, such as helping settings to be aware of the system, where to go for guidance and support, how to discuss concerns with parents/carers, how to make a referral, and ways to communicate and share information. Coram PACEY Cymru worked with Cwlwm partners and Welsh Government to develop some frequently asked questions in the form of a Blog to help address inconsistencies, however we feel that more guidance is still needed directly from Welsh Government. Coram PACEY Cymru have developed additional Blogs, resources and information; however, it would be timely to consider whether further national resources, training and information could be made available to illustrate practice worth sharing and support with a consistent approach across Wales, and to ensure that training is accessible and inclusive for all childcare providers. We strongly feel that this guidance needs to come from Welsh Government, with supporting statements from Care Inspectorate Wales and Estyn, to ensure consistency in the way that local authorities and other partners implement this.

Much like that prepared for the [Foundation Learning resources](#) Coram PACEY Cymru believe that practitioners would benefit from Vlogs and case studies which reflect the provision they work in. We know that practitioners glean a good deal from peers. Therefore, having a suite of accessible support and resources that is accessible to all at any time would be beneficial. Feedback from practitioners suggests that for them to meet the needs of an individual child, their greatest need was for access to specialist guidance and support. They felt this would help them really understand an individual child's needs and how best to support them within their setting. However, access to specialist support and guidance varies; and is often programme led so only available for funded settings, rather than wider childcare provision.

**Additional comments:**

Coram PACEY Cymru predominantly support home-based childcare providers including childminders and nannies. The latest CIW statistics provided to us show that the majority of childminders work alone (approximately 84%). Childminders are not currently funded to provide funded education so the changes will not have had such a significant impact on them than for those who are funded. They will still need to have an awareness given the curriculum links to the National Minimum Standards for

Regulated Childcare in Wales and the requirement on them to understand and apply the principles. We believe that the keener and more engaged members have a clearer understanding of what this means for them however the knowledge and confidence is likely to vary significantly.

The number of registered active childminders in October 2019 stood at 1,776. This has declined to 1,089 in April 2025, a reduction of 34.4 per cent. With the significant and continued decline of childminders Coram PACEY Cymru strongly believe that changes need to be made now to ensure childminders can provide funded education and that this should be prescribed clearly at a national level, rather than through Local Authority discretion. The need for this is recognised in the [Independent review of childminding](#), recommendation 19 states that 'Local authorities, with the support of the Welsh Government, should consider extending opportunities to deliver wider government funded provision to childminders across all local authority areas in Wales'.

We believe that this would ensure parity of opportunities across the sector, support sustainability of childminding settings and consideration of parental choice. This supports better outcomes for children through providing continuity of care that meets children's needs linked to well-being. Coram PACEY Cymru understands the cost implications of using childminders to provide funded services but believes that the outcomes for children should be central to any decisions made.

Despite progress in relation to work linked to the Independent Review, key challenges remain, and the number of childminders continues to decline. Coram PACEY Cymru remain concerned about three key areas: start up support, Flying

Start and Nursery Education. We believe that without further action in these areas, the number of childminders leaving the sector will continue to decrease.

### **Barriers and challenges**

A clear barrier reported by settings, and a key theme in the enquiries that we receive, is financial cost and support needs. It is extremely difficult for settings to access financial support to help meet individual needs, whether for a one-off purchase of equipment or resources, or towards the cost of additional staff or reducing ratios within the setting. Whilst some schemes and grants are available, these are usually linked to funding programmes,

with often inflexible eligibility criteria, for example Flying Start, Childcare Offer or funded education and is not widely available for privately funded childcare places where children have identified needs. Settings will try to make reasonable adjustments, where possible, to meet the needs of children, however, there is an increasing number of young children coming through requiring additional support. Childcare settings are already facing financial sustainability difficulties and so there is an increasing need for further financial support to help meet these costs or loan schemes introduced for provision of equipment. Coram ACEY Cymru know of home-based childcare settings who are choosing to reduce their ratios and take a financial impact to lower numbers within their setting in order to offer the care required for a child with additional learning needs. This we know makes it challenging for settings to be sustainable and is not something that can continue long term.

The 20% increase in the [Childcare Offer for Wales hourly rate](#) in April 2025 was welcomed; this has helped sustainability for many of the childcare sector although we continue to believe it is hugely important to keep the child at the centre of any approach or support model rather than the requirements of a programme or funding being central to decision making. We strongly believe there needs to be flexibility around funding and an innovative approach when a child does not match the criteria or interpretation of a programme or funding.

### **Moving forward**

If the ALNET Act and Code can facilitate improved communication between all partners (whether they are funded to deliver education or not) and enable access to professional guidance and support for all parties to meet a child's individual needs, then this would have an immensely positive impact on the aim of equal access for childcare and play opportunities for children and young people with disabilities and/or additional learning needs. This requires not only an inclusive approach from the local authority EY ALN LO on working with all types of childcare providers caring for children in the early years, but also similar recognition and support for those caring for school-age children when the responsibility for ALN transfers to maintained education settings. As we are all aware getting this right in the early years is key if we are to realise the ambitions of the ALN Act and Code and give each individual child the best possible chances to realise their potential. Feedback

from practitioners suggest there is still a lot of room for improvement in the support and communication that they receive from partners with lead roles in the ALN process. In our research, some childminders reported that they feel excluded or that they are not given the same recognition as other professionals involved in the child's care, learning and development. Coram PACEY Cymru firmly believe that further national resources, training, guidance, and information should be made available to illustrate good practice and support with a consistent approach across Wales, and to ensure that training is accessible and inclusive for all childcare, play and early years providers. We would be more than happy to work with Welsh Government and partners to support the development of this.