

**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 76**

**Ymateb gan: NAHT Cymru**

**Response from: NAHT Cymru**

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**About us:**

NAHT is the largest professional trade union for school leaders in England, Wales and Northern Ireland. We represent more than 38,000 head teachers, executive heads, CEOs, deputy and assistant heads, vice principals and school business leaders. Our members work across the early years, primary, special and secondary schools; independent schools; sixth form and FE colleges; outdoor education centres; pupil referral units, social services establishments and other educational settings. In addition to the representation, advice and training that we provide for existing school leaders, we also support, develop and represent the school leaders of the future, through the middle leadership section of our association. We use our voice at the highest levels of government to influence policy for the benefit of leaders and learners everywhere.

**Introduction**

NAHT Cymru welcomes the further opportunity to provide evidence to the Welsh Parliament on the impact of its recent education reforms, including the introduction of the Curriculum for Wales and reforms to the ALNCo system. This paper sets out a summary of our members' collected views on these reforms as at October 2025. In doing so, it builds on previous submissions NAHT Cymru has sent in to Welsh Parliament as ongoing evidence.

NAHT Cymru's members felt at the time that the new and innovative Curriculum for Wales was introduced that the policy intention behind the new curriculum was positive, ambitious and the right step for Wales. At the same time, our members set out from the outset their concern that the development and progression of the Curriculum for Wales might serve only to further highlight not only the existing funding crisis in Wales, but also the inconsistency of funding for schools across local authorities and regional consortia. Our members continue to be concerned at the difficulty of releasing staff for curriculum development when staffing needs and resources in school are so tight. A lack of funding has meant that schools are developing a new curriculum on top of existing workload pressures.

This is exacerbated by the increasing and unfunded level of demand for ALN services needed by pupils. Concern around sufficiency of funding, or more precisely the lack of it, behind reforms to the ALNCO system was also the greatest issue for our members.

To inform our response, we have during September surveyed NAHT Cymru's members on the issues in this consultation, and our response draws on the comprehensive evidence we have collected from our members, of whom 189 responded in full to our



consultation. We are of course willing to share the survey findings in full with you if that would be helpful.

We therefore offer the following commentary based on what our members have told us through our recent survey:

### ***Implementing the Curriculum for Wales in early years settings, primary schools and secondary schools.***

By far the biggest issue our members had with the implementation of the Curriculum for Wales, as we had anticipated from the outset, was the **lack of funding** available for its proper implementation.

88% of survey respondents rated their experience of the level of funding available for the implementation of the Curriculum for Wales as negative or very negative – some 46% of responses were ‘very negative’. Indeed, chronic underfunding and how it affects staffing, training, curriculum delivery, and support for ALN pupils, came up regularly in our member survey.

The aspects of the implementation rated most negative were the level of funding available, and the level of training offered in support of the reforms. On the other hand, the most positive was the timeframe given, with 47% of responses being positive or very positive.

Our members experienced a series of barriers impacting how they implemented the Curriculum for Wales. Again, the issue that had the biggest impact on our members’ implementation was levels of funding, with 90% of respondents to our survey highlighting this as an issue.

Unfunded ALN demands on schools are also a key concern. 66% of respondents emphasised high levels of ALN as a barrier, and 57% mentioned fall-out from the Covid pandemic. Members expressed concerns at the rising ALN demands post-pandemic, and the lack of specialist provision to implement the new curriculum in that environment. One respondent simply wrote that the *‘lack of ALN funding is breaking us’*.

Members also suggested that the Curriculum for Wales implementation was rushed during a time when schools were still recovering from the Covid pandemic, leading to fatigue and reduced enthusiasm.

Allied to this, members also raised a lack of support from Welsh government, including insufficient training and information to implement the new curriculum, and an unclear assessment and progression framework.

There were also concerns about 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.

More positively, 85% of respondents to our September 2025 survey told us they have had the opportunity to collaborate with local schools on curriculum to ensure consistency and share best practice.

### ***Reforming qualifications to align with the Curriculum for Wales.***

Newly-minted qualifications always need time to be embedded and widely accepted as currency. Our members raised a range of issues about how qualifications had been reformed in line with the new curriculum, particularly highlighting the misalignment between the new qualifications and learner needs. Members expressed concern about the uncertainty around future formats of qualifications, and the logistical challenges of managing multiple qualification waves.

Members also expressed worry about the increased workload caused by the qualification changes, referencing increased assessment and planning demands, especially in English and science, with insufficient time in school calendars. Members also noted that new additional science content and the late return of legacy triple science have disrupted school planning.



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

As with curricular reforms, our members highlighted funding as the biggest concern with implementing the new ALN system. When rating their experience of the implementation of the new ALN system, almost all respondents (97%) rated the level of funding available as negative or very negative, with a very high 79% rating it as 'very negative'. Members felt that the promised cost neutrality of ALN reform is quite simply unrealistic, as in reality schools are having to absorb additional costs without receiving any additional support. When asked which issues had a negative impact on their implementation of the new curriculum, 93% of members highlighted levels of funding. Other key issues raised were unreasonable parental expectations of the reforms (77%), lack of specialist staff and resources (71%) and high levels of SEN (69%).

Members also told us about their concerns around a lack of specialist provision, leaving pupils with complex needs in mainstream settings that cannot meet their requirements - particularly without access to appropriate environments like sensory rooms or quiet spaces.

The implementation of the new ALN system has been found to be unfunded, complicated and daunting. Members also raised concerns about the ALN system as a whole, describing it as chaotic with inconsistent guidance, burdensome referral processes, and a postcode lottery in support and funding. Members emphasised the impact on ALNCoS, particularly due to the volume of documentation and frequent changes to forms and guidance, with minimal training available to practitioners. Without proper funding and support in place from the start, the reforms cannot be delivered successfully.

Members emphasised the impact on pupils, with schools increasingly unable to deliver quality universal provision. This in turn is failing both ALN and non-ALN learners. Almost all respondents (97%) reported that the move from the SEN system to the ALN system has led to an increase in their workload, with 71% reporting a significant increase. No respondents at all reported any kind of decrease in workload.

Over half (62%) of respondents to our survey felt their experience towards the new ALN system had been negative compared to the old SEN system, with a quarter (25%) reporting a very negative experience. Only 12% felt their experience had been positive. This is a hugely concerning finding for the evaluation of the reforms.

***Applying 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.***

There is concern that ALN pupils are now simply missing out on even being identified as in need of vital support. 88% of respondents identified that they had experienced situations where learners who would have previously received SEN support no longer qualify under the new ALN system. 77% of respondents identified that it is more difficult for learners to be identified with ALN compared to in the old SEN system. Only 7% of respondents said it was easier for learners to be identified, with 14% mentioning no change.

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

More of our members had a negative than a positive experience with the training on offer to support implementing the reforms. On the Curriculum for Wales, 54% of respondents rated their experience of the training offered as negative or very negative. For the ALN system reforms, 52% of respondents rated their experience of the training offered for the implementation of the ALN system as negative or very negative.



***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.***

Our commentary above has already covered in some depth the impacts of both insufficient funding and of the pandemic.

***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.***

On implementing the Curriculum for Wales, around a quarter (24%) of respondents said small school size had had a negative impact. Other factors included small school size (7%) and rurality (4%). Some respondents told us that factors around their school's context, such as high pupil mobility, building issues and levels of deprivation in the area, were a barrier to implementing the reforms.

On the ALN system reforms, issues with a negative impact included 40% of respondents specifying high levels of deprivation. 18% referencing small school size, 6% language medium, and 4% rurality.

### **Conclusion**

NAHT Cymru trusts that the above analysis from our very recent survey of members gives an accurate, timely and up to date assessment of how the recent educational reforms have been received at the chalkface in schools across Wales.

While the initial intention of the reforms was welcomed, and timeframe allowed to implement them reforms generally seen as sufficient, it is clear that our members have serious and genuine concern around the lack of funding available to introduce the reformed system successfully, couple with a lack of supporting structures in place to ensure that the reforms could be successfully implemented. Without these solid foundations having been in place, it is clear from what our members tell us that the reforms and their intended benefits have in practice been almost impossible to implement.

