

**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 79

Ymateb gan: Parents Voices in Wales CIC
Response from: Parents Voices in Wales CIC

Dear Committee Members

We submit evidence on behalf of parent and carers in Parents Voices in Wales CIC, on the fourth ALN Reform Implementation Review.

We are aware there is nearly a 50% decrease in learners identified as SEN/ALN as per the last plenary. These lost neurodivergent learners will be referred to in this submission as the 'missing middle'.

Parents and Carers report that schools are struggling to provide adequate support for the mainstream learners who may not be identified on the ALN Register with needs not being leading to increasing rates of absence, isolations and exclusions. Neurodivergent/ALN Learners are in mainstream schools with needs not identified due to a lack of understanding in female presentation of Autism/ADHD, causes of emotional dysregulation, one size fits all approach or universal learning provision and thresholds creating barriers to additional learning provision which may only be transient in a neurodivergent learner's journey through school. We require improved inclusive practices within universal learning provision (ULP) to capture those most at risk.

We believe the ALN Reform still reflects a medical model in essence and has created a barrier for those learners not identified as having additional needs (ALN)



before hitting crisis and there is also an assumption that universal learning provision is adequate for all. This depends of course on the quality of ULP and the understanding of education staff on neurodivergence presentation and the benefits of a needs led approach for all students but requires a whole school subscription. We should not need to wait for learners to fail/hit crisis and early identification can be made possible by neurodiversity awareness training that packages together ALN Reform, Whole School Approach and Curriculum for Wales by focusing on emotional regulation, safe relationships, inclusive practices and strength focused approaches. The resources in school are too limited for a medical lens at the end to capture the numbers of learners who require support. It creates a threshold that excludes the missing middle who are the majority in mainstream requiring early help needs led approaches, puts unrealistic demands on the ALNCOs and causes undue stress on families.

We also need to be mindful of the inequalities in those experiencing mental health issues. The majority of learners being referred onto the wellbeing and CAMHS inreach services pathways will be neurodivergent at 65% (Parents Voices and ADHD Foundation Wales Survey 2020) and our support requires neuroaffirming practices such as digital offers, play therapies and dialectical behaviour therapy. These are more appropriate for the 1 in 5 with learning differences. If we want to dovetail ALN Reform into the whole system approach we need to go upstream and identify learners as early as possible and this requires a whole school subscription to a biopsychosocial model to align more closely to the Neurodivergence Improvement Programme and the developing the Neurodivergence Code of Practice.

Parents Voices in Wales CIC Recommendations

We would like to see immediate improvements of ULP across Wales mainstream provision to support a cultural shift where learners do not have to reach a crisis or 'become ALN' either through exclusions, mental health or emotional based school avoidance, before school will accept there are needs to be met. It would be constructive for DECLOs within the Health Boards across Wales to become inclusion ambassadors ie Neurodiversity Champion enabling the whole system



approach to ensure our CAMHS, Social Care and Education are more neuroaffirming and meet the needs of neurodivergent, ALN and looked after Children as early as possible, working closely with the ALN Teams in Local Authorities and Governing Bodies. We can no longer separate Neurodivergence from Additional Learning Needs and have ranging disparities in practice across Wales due to the differing levels of understanding of the benefits of a whole school and system approach to inclusion.

We understand that Welsh Government's Neurodivergence Improvement Programme's digital profiling offer will be crucial in supporting schools in meeting needs but we must also accept that we cannot support the missing middle neurodivergent learners and reduce demand on ALNCOs for IDPs or on Neurodevelopmental services until Welsh Education aligns to better inclusive practices across mainstream schools. Families are calling on Welsh Government to bridge the gap in language and legislation on the difference between Neurodivergence and Additional Learning Needs so, that we can create a biopsychosocial culture in our schools to ensure no child is left behind. For example :

- O better quality ULP with a step up step down approach to additional learning provision (ALP) reducing the demand on IDPs

- O that ALNCOs have exclusive focus to the role and do not undertake teaching roles

- O that ALNCOs form part of the senior leadership teams (SLT) and their decisions are not undermined by Head Teacher (HT) or Local Authority (LA) when supporting families

- O that there is responsibility for SLT leading for Pedagogy to ensure teaching staff and TAs fully embrace neuroaffirming practices within classrooms – self/school evaluation integrated into the whole school approach

- O investment into Teaching Assistant recruitment – this is crucial to supporting mainstream learners



O embedding trauma informed relational approaches to overcome punitive approaches to behaviour which are misunderstood as deliberate rather than emotional dysregulation due to needs not being met

O reviewing the Initial Teacher Training Curriculum and ensuring that neurodiversity awareness and inclusive practices are embedded as early as possible

O that Local Authorities work more closely with the Health ND Teams in embedding inclusive practices and engaging with third sector organisations like Parents Voices in Wales where we can share best practice and support education through training and elevating the family voice

O how understanding neurodiversity also entails understanding strength focused approaches and can support the Curriculum for Wales skills and improve a learner's wellbeing and sense of belonging

O that schools reach out to Neurodiversity Aware business who can provide aspirations for all learners and not the academic attaining students

O for NEST Framework and Whole School Approach to work more cohesively where services and third sector come around school communities and actively target 'learners of concern' as early as possible, where trusted adults are proactive in building connections and relationships and support for learners are not just assigned to wellbeing or pastoral staff where relationships may not be successful. The school has a pool of trusted adults and relationships cannot be prescriptive, we have to allow families and learners to choose who they work best with and this would align to the Rights of the Child in having autonomy in their educational environment to elevate their voice in order to meet their needs.

O Address the power imbalance between education staff and families in deciding the needs of the child – this is still a barrier for families resulting in increasing rates of low attendance and mental health challenges. The Core Principles of the NEST Framework is being rolled out in Cwm Taf Morgannwg RPB using the 'Golden Thread' Project highlighting the importance of values led relationships and Parents Voices in Wales endorses this to support a cultural shift within our communities.

O We request that Welsh Government Education create an Advisory Group to support the Minister and policy teams on direction of travel in a targeted approach. This would support the ALN Effective practice where parents, carers



and minority groups are invited to share their experiences to help frame best practice going forward.

Welsh Government ALN Effective Practice

We are delighted that Welsh Government have rolled out the ALN Effective Practice Sessions for Educators sharing best practice across Wales. We would also like Welsh Government and Welsh Local Government Association along with the National Neurodivergence Team to target local authorities and schools where there are higher rates of exclusions and low attendance as this is deemed by us as a reflection of lower levels of inclusive practice.

Relationships with Schools

Parents and carers report that there remains a power imbalance culturally and the Estyn Report was unhelpful in reflecting the attitude of parents. There is undoubtedly a percentage of parents and carers who support their neurodivergent or ALN child to not attend school but this is because there is a lack of understanding about the need to access a consistent trusted adult, that universal provision is not to standard to meet needs and the discrepancy in opinion on presentation of a child.

We propose that parents/carers access a digital profiler on the National Neurodivergence Team's website in the future that can provide a needs led plan of the learner to overcome barriers to school attendance and emotional regulation. We believe that an objective non diagnostic profiling tool would support a coproduced plan and overcome the barriers families currently experience and help reduce demands on the ALNCO and neurodevelopmental teams. We create waiting times in health by not addressing the power imbalance in education (parents as experts in their children) and enabling a medical model to continue when the majority need low level accommodations.



Parents Voices in Wales would like the opportunity to work more closely with Welsh Government Education and Welsh Local Government Association to complement our current stakeholder roles in the National Neurodivergence Team and Neurodivergence Ministerial Advisory Group and help bridge the gap between perspectives on Neurodivergence and Additional Learning Needs.

As previously stated we propose a parent and carer forum to be a sub group of the Welsh Government ALN Effective Practice where 'Stories from Lived Experience' help schools to witness the benefits of improved inclusion and the power of relationships. We ask Welsh Government Education to align to Health and Social Care and include the voice of lived experience more centrally going forward.

We believe in the concept of the ALN Reform but it needs to be developed further with inclusion underpinning and not an optional add on to culture.

We thank Lynne Neagle MS for her commitment to supporting children and families in Wales and believe that we can overcome the barriers in Wales by working more closely together.

Ceri Reed

Parents Voices in Wales CIC

