

The Children, Young People and Education Committee

Implementation of education reforms

Use this proforma to record your views. Please make sure that you have answered all of the questions that are relevant to you. When you have completed the proforma, please email it to SeneddChildren@senedd.wales.

We are keen to hear from as many people as possible. If you would like to submit your views but do not want/are not able to complete this proforma, please call the Committee's clerks, who can arrange with you a different way for your voice to be heard.

0300 200 6565

SeneddChildren@senedd.wales

Information about you

1. Name:

Dr Kirsten Jones

2. Email address:

Kirsten.jones@natspec.org.uk

3. In what language(s) will you be completing this survey?

To submit a bilingual response please submit a Welsh and English version of the survey.

I am submitting in Welsh only.	<input type="checkbox"/>
I am submitting in English only.	<input checked="" type="checkbox"/>
I am submitting in both Welsh and English.	<input type="checkbox"/>



4. Would you like to be added to the Children, Young People and Education Committee’s contacts list in order to receive updates about our work?

You can unsubscribe at any time by emailing SeneddChildren@senedd.wales

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

5. In what capacity you are responding to this consultation?

In a personal capacity (go to question 6)	<input type="checkbox"/>
In a professional capacity (go to question 9)	<input checked="" type="checkbox"/>

Personal capacity

If you are submitting a response in a personal capacity, we ask that you provide your name and postcode.

Before accepting material from those aged 13 or under, we require authorisation from the young person’s parent or guardian, provided in the form of an email to SeneddChildren@senedd.wales from the young person’s parent or guardian.

6. What is your full postcode?

7. Are you under 13 years old?

I am under 13 years old	<input type="checkbox"/>
I am 13 or over	<input type="checkbox"/>

8. Please choose one of the following options to confirm whether you would prefer that your name is published alongside your evidence.

We will not publish the names of people under the age of 18.



I am aged 18 or over and I am content for you to publish my name alongside my evidence	<input checked="" type="checkbox"/>
I am aged 18 or over and I would prefer that you did not publish my name alongside my evidence.	<input type="checkbox"/>
I am under the age of 18	<input type="checkbox"/>

Professional capacity

If you are submitting a response on behalf of an organisation please enter your details here.

If you are responding on behalf of an organisation, we will publish the name of the organisation but will not publish your name or contact details.

If you are responding in another professional capacity, we will publish your job title/role, if relevant. We will also publish your name if you give us permission to do so. Your contact details will not be published.

9. Your role:

Policy Officer

10. Are you responding on behalf of an organisation?

Yes (go to question 11)	<input type="checkbox"/>
No (go to question 12)	<input type="checkbox"/>

11. Organisation name:

Natspec

12. Please choose one of the following options to confirm whether you would prefer that your name is published alongside your evidence.

I am content for you to publish my name alongside my evidence	<input checked="" type="checkbox"/>
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I would prefer that you did not publish my name alongside my evidence.



Your views

We will consider the views we receive at regular intervals over the course of the 6th Senedd.

13. Please record your views that relate to any of the following terms of reference (please keep your response to no more than 2,000 words in total):

- Implementation of the Curriculum for Wales in early years settings, primary schools and secondary schools.
- 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 associated reform of qualifications to align with the Curriculum for Wales.
- Implementation of the new Additional Learning Needs (ALN) system and the effective transfer of learners from the existing Special Educational Needs (SEN) 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 professional learning and other support settings are receiving to ensure effective implementation of the Curriculum for Wales and the ALN system.
- 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.
- 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.

In principle, we are supportive of the extension of the implementation period and hope this time can be used to address matters of fundamental importance affecting implementation. This includes ensuring that the Additional Learning Needs Co-ordinator (ALNCo) workload capacity is fit for purpose and Welsh Government addressing the



ambiguity in the Additional Learning Needs (ALN) Code on entitlement to post-16 education and training (see below).

While supportive of the extension to the implementation period, there are unanswered questions on how it may affect the 'flow through' system for post-16 learners. We are concerned that the elongated timeframe may mean some post-16 learners 'slip through the net' and leave school with neither an Individual Development Plan (IDP) or a learning and skills plan (LSP) and therefore have no route to further education (FE) if their additional learning provision (ALP) is a specialist college.

Access to information and advice for learners with complex ALN is a concern. Welsh Government's own 'Parents guide' on their website is now inaccurate and has not been updated. Similarly, the ALN pathfinder website often promoted as a post-16 resource does not reflect the ALN Code and post-16 options for learners with complex ALN.

In relation to the professional learning and other support that settings are receiving we want to raise the two key concerns. They are ALNCo understanding of post-16 education and training options and the need for pan-Wales professional development to ensure staff across FE providers have the requisite expertise to meet the further education and training needs of learners with increasingly complex ALN.

Firstly, it is now well recognised across sectors and stakeholders that post-16 routes to further education are jeopardised by ambiguity in the ALN Code. This raises the importance of professional learning for ALNCo to ensure a consistent understanding of post-16 options for learners with complex ALN. It will be critical to accessing FE that school leavers' IDP outcomes are written for a post-16 context, are age appropriate, ambitious and person-centred.

IDP outcomes will be central to assessments of a 'reasonable need' for education and training (see ALN Code Chapter 17:75) that will need to be made by local authority (LA) officials who maintain the IDPs of learners whose ALP is not a Further Education Institution (FEI). Hence, ensuring outcomes are fit for purpose will be of far greater consequence to these learners than those whose ALP is an FEI who will largely have uncontested routes into FE.

Secondly, ALN reform is placing increased responsibilities on FEIs to meet the needs of learners with more complex ALN. A recent project commissioned by Welsh Government and jointly funded by Natspec aimed at encouraging specialist FE colleges and FEIs to work collaboratively to meet the person-centred aspirations of the ALNET Act, identified that FEIs are looking to specialist colleges for continuing professional development opportunities. For example, on meeting the education and training needs of learners who are non-verbal, have complex autism, specific or profound and multiple learning difficulties and disabilities. Effective implementation of the ALN system requires teaching, learning and support staff having the requisite skills and knowledge to ensure quality outcomes that will prepare learners for their post-college adult lives.

Natspec is calling for Welsh Government to build on the resource and information sharing between different college types achieved in the partnership project and consider the development of a Post-16 ALN virtual academy to serve as a stakeholder resource and repository for information, guidance, resources and the development of best pedagogic practice for learners with low incidence and complex ALN. This would maximise long-term benefits and positive learner FE outcomes for learners with complex ALN in Wales.

Our primary concern on the implementation of ALN reform is how ambiguity in the ALN Code on post-school further education is resulting in different interpretations for learners



with complex ALN. Wales The Third Sector Additional Learning Alliance ([TSANA](#)) published a position statement outlining concerns that ALN reform will result in some learners not being able to access the further education colleges they need because their ALN requires that their additional learning provision (ALP) is a specialist FE college.

This uncertainty on entitlement to post-school education and training risks learners across Wales experiencing postcode lotteries of access to FE. We are already seeing examples of local authorities planning to move learners directly into social care if their ALP is not a regional FEI.

Transparency is required on decision making protocols for this group of learners and particularly on the assessments of a reasonable need for education and training that LA officials are required to make.

We believe that the ALN Code's emphasis on a placed-based notion of inclusion in education (i.e. that all learners should be educated in the same settings) and that LAs should meet needs locally is wholly appropriate for the vast majority of learners. However, for learners with low incidence and complex ALN, inclusion in education fundamentally means being included in education by being able to access the additional learning provision they need to meet their ALN. Unlike in England where high needs learners are funded the same way whether they require mainstream or specialist further education, Wales has different funding mechanisms depending on the ALP learners need. These two factors of ALP contingent funding and ambiguity in the ALN Code when considered alongside the extraordinary and unprecedented pressure facing local authorities, risks ALN transformation resulting in a reduction of FE and training for Wales' most vulnerable learners.

We believe that FEIs, LAs and the specialist college sector should identify any gaps in existing provision and work in partnership to meet any identified needs. The benefits for learners of mainstream and specialist colleges working together include extending or enriching learning opportunities, enabling learners to progress further, upskilling workforces to better meet learner need and enabling inclusion.

A final factor affecting implementation of ALN system that we want to draw to the Committee's attention is a lack of pan Wales policy on travel for further education learners with ALN. As ALN reform is implemented this is becoming increasingly problematic for learners, their families, FEIs and specialist colleges. We are aware of some learners not commencing placements at both FEIs and specialist colleges because transport cannot be arranged.

Information about third parties

14. Please choose one of the following options to confirm whether you have agreement from any third parties* referred to in your evidence that you can share information that may be used to identify them and that they understand that it may be published.



* Third parties means any person, other than you, who can be identified in the evidence that you share with us.

I confirm that any third party I have referred to in my evidence has agreed that I can share information that may be used to identify them, and that they understand that it may be published.	<input checked="" type="checkbox"/>
I do not have the agreement of one or more of the third parties I have referred to in my evidence.	<input type="checkbox"/>
I have not referred to any third parties in my evidence.	<input type="checkbox"/>

