

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 27

Ymateb gan: Natspec

Response from: Natspec

Nodwch eich barn mewn perthynas â chylch gorchwyl yr ymchwiliad. | Record your views against the inquiry's terms of reference.

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 ALNCoS 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.

