

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 29

Ymateb gan: NAHT Cymru

Response from: NAHT Cymru

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

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.

NAHT members have stated the level of consistency and equity of learning opportunities for pupils across Wales has not been consistent. NAHT feel that the development and progression of the new Curriculum for Wales has only further highlighted the existing funding crisis we have in Wales, and the inconsistency of funding for schools across local authorities and regional consortia. School leaders and NAHT members have expressed how difficult it has been to release 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. NAHT further see how this struggle has differed across schools based in different Local Authorities. NAHT members strongly feel that equality of funding is key to opportunity.

Whilst members of NAHT strongly feel that the purpose of the new curriculum is positive, ambitious and the right step for Wales, they feel there is a danger that without equity of funding, the new Curriculum will fall at the first hurdle. Moreover, members feel there was no equity when it was first developed, with some schools receiving significant funding and support to develop the curriculum as pioneer schools, and this funding has not been matched now the roll out of the new curriculum has begun. This has meant that the funding was significantly less than the initial funding was for pioneer schools, only adding to the existing inequity problems across local authorities and the regional consortia.



A key concern for NAHT members is whether other bodies are developing their principles and understanding alongside schools who are developing this new curriculum. Members are particularly concerned that Estyn are not reforming their process to allow for schools to properly develop and grow their new curriculums. School leaders urge the Welsh Government to allow for growing pains and for Estyn to understand that positive, long-term progression and development involves making mistakes, trying new things and learning from it. NAHT calls on Welsh Government to support a change of culture across the inspectorate that allows this to take place, and for schools to not feel they have to box tick for Estyn, whilst simultaneously trying to create a new curriculum framework that best supports their learners needs.

Further to the above concerns, members of NAHT feel overwhelmed by the prospect of developing the new curriculum on top of their existing workload and teaching responsibilities. Leaders in Wales call for more funding, staff and resources to allow teachers and senior leaders the time to develop and evaluate the new curriculum in their schools. NAHT agree that there should have been a mechanism to create additional capacity within schools for development. This should have included dedicated senior leadership time for curriculum development.

The associated reform of qualifications to align with the Curriculum for Wales.

NAHT members have expressed their concerns that the new curriculum developed by schools will either be at odds, with an existing, and barely changed assessment system, or that schools will inevitably use the same progression and development measures that they have already been using to accommodate qualifications.

NAHT members want to press upon Welsh Government that a new curriculum should be meaningful, and not bow to the pressures of what can be measured. NAHT members want the government to consider how the qualifications can work for the new curriculum, and not, how the new curriculum can work for the qualifications.

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

The implementation of the ALN system has been found to be complicated and daunting. Members find that their staff are finding the writing of the Individual Development Plans (IDPs) incredibly stressful, burdensome, and time-consuming.



NAHT members report that the workload is huge, with no funding/very limited funding to release the ALNCo to do this. Members report that it takes only a few new cases or new learners with needs to push an ALNCo's workload beyond what is reasonable and even possible. Members of NAHT therefore call for Welsh Government to make the ALNCo role a fully funded non-teaching position.

Further to this, remuneration for ALNCo's is a key concern. The STPC(W)D does not currently have a pay scale for the ALNCo role. NAHT want to press upon Welsh Government that it is a senior management role with significant responsibilities and a legal duty. The ALNCo must be properly remunerated to reflect the seniority and responsibilities held within this position.

Many NAHT members also feel that the new ALN guidance has not improved the support for learners, and has, in reality, created more and more admin work. There has been no workload impact assessment produced, which should always be the starting point for change and instead members are now finding it near impossible to cope with the new level of workload. Members of NAHT feel that the system has become less about provision and more about paperwork, and ALNCo's are spending less and less on contact time and more and more time on admin.

NAHT members further wanted to highlight that the timing of the ALN reforms and the new curriculum roll out is overwhelming and difficult to cope with. This is only further exacerbated by a lack of any real extra funding, staffing, or support.

NAHT calls on government to look at funding in this area as well. In many schools the additional funding received for Pupil deprivation is supporting ALN. In many schools with high levels of ALN but low levels of deprivation, schools are struggling to find the funding to support this crucial and statutory work.

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 reality for many of our members is that the application of the new definitions of ALN have impacted or supported learners very little, and instead has increased the level of backroom and admin work for teaching staff.



NAHT members feel there needs to be greater clarity of the definitions to ensure there is consistency of support. NAHT want to highlight that to ensure, in practice a wider, more inclusive definition of ALN, we must see more funding to support learners needs, so members are not left searching for solutions that can lessen existing workload. Members are frustrated when new systems, which are meant to better support learners, just create more bureaucracy without increasing capacity for schools to support all learners with ALN.

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.

Throughout this response we have clearly highlighted that for our members, a lack of funding is paramount and a key driver for many of our members concerns. NAHT wish to reiterate that the inconsistency of funding across the local authorities and regional consortia in Wales continues to become a bigger and bigger concern. Nationwide development and reform must have a consistent and equitable funding system, which supports all schools. Equitable and reasonable funding means that a diverse system of schools, demographics, language mediums and social needs can be fully accommodated for in a new future for Welsh education.

