

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 42

Ymateb gan: NASUWT Cymru

Response from: NASUWT Cymru

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

Last month, the NASUWT sent a snap survey to teacher members in primary, secondary and other settings on the progress of the Curriculum for Wales (CfW) which attracted 450 respondents.

Regarding the implementation of the CfW, respondents noted **positive** aspects of the roll-out, for example:

- *“Flexibility around topics and delivery”;*
- *“There has been a good amount of time between the introduction of the curriculum and the exams; it’s been exciting and allowed lots of reflection of practice.”*
- *“It feels like there are more opportunities for cross-curriculum working and more links between learning areas. I like it!”*
- *“Being more aware about providing an holistic approach in terms of integrating subjects - for e.g providing mathematical and numeracy development within humanities”*
- *“The CfW has the potential to develop love of learning, creative thinking and a myriad of other skills that will positively impact our communities in Wales and further. However, there is still a lack of time to develop a curriculum that will do this justice in the Secondary sector. Teachers should be given time off-timetable to work collaboratively.”*

Respondents noted **negative** aspects of the roll-out, for example:

- *“It has been a huge effort for no discernible educational benefit. Just another waste of valuable time and energy when the fundamentals of what we have to teach learners have not changed at all and with no idea from the outset of where we are expected to learners to in terms of GCSE qualifications as these are going to change also.”*

- *“Increased workload for many. Some of our staff are effectively 'one person' subject areas but not paid as subject leaders but have had to construct new curricula with no time or payment.”*
- *“How are we supposed to create a new meaningful and effective curriculum without significant time to plan it? We are given an hour here and there, but it's simply not enough to work a) as a department b) as an AOLE and c) Cross curricular. The CfW has so much potential but its unrealistic to think schools will all do a good job when interpretations vary so massively, and time is insufficient.”*
- *“The framework is not specific enough and has led to difficulty in ensuring progression. This has now become one of the biggest pressures on schools/teachers and it is directly related to the lack of detail in the new curriculum.”*
- *“Lack of time given to actually engage with the new curriculum and for the actual school based curriculum design process. We've been given a new, very vague curriculum but with no dedicated time or structured programme to support teachers. Yes, a limited number have accessed cpd for their AoLE (often SLT member who may not even be teaching), although some of this has been in sessions after the school day, but the vast majority of staff are trying to work out what to do in their own time while already overwhelmed by planning, preparation, supporting learners with ALN.”*

59% of respondents noted that the CPD offered was poor, with only 4% stating it was excellent.

81% of respondents reported that the provision of non-contact time to implement the CfW was poor, with only 2% claiming the provision was excellent.

82% of respondents reported that the provision of new resources was poor, with only 2% claiming the provision was excellent.

69% of respondents reported that the provision to co-construct the CfW with other schools was poor, with only 4% claiming the provision was excellent.

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 is variable. Factors such as school size, budget and chosen staffing structure affect the form and function of the adopted curriculum. The level of support – be it along cluster or catchment areas, alongside adequate resourcing (physical resources as well as non-contact time to work on the curriculum) also affect the provision. Not least, the continued ambiguity on how secondary schools and centres will ultimately test the curriculum via

GCSEs and equivalent qualifications means that schools still scrabble in the dark as to what the ultimate direction they need to take.

This latter point remains a significant issue for our secondary school members. In the aforementioned snap survey, members' comments stated:

- *"Inconsistency and ambiguity within the guidance especially with regards to assessment."*
- *"Confusing, unclear and not matching up to GCSE qualifications"*
- *"What's the end goal? How can you plan a curriculum without knowing how pupils will be tested."*
- *"The lack of any specimen materials and trying to plan year on year when it's more effective to plan backwards-understand the reasoning but we really need the exams now."*

Qualifications Wales are still finalising the form that the keystone qualification of GCSEs, along with any vocational counterparts, will take. These are UK-wide and internationally recognised and must set the benchmark, and it is a failure of the whole implementation of the CfW that the curriculum was set in place first without any idea of how learners would gain qualifications from it. The qualifications, as national benchmarks, should have been set first, with the curriculum then written such that it would ultimately lead all learners to those qualifications.

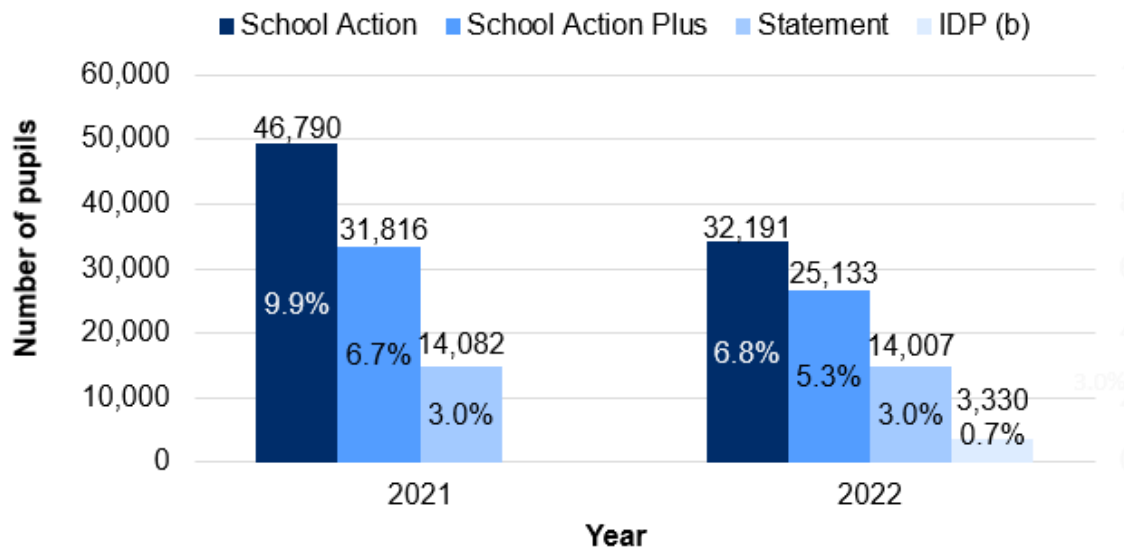
Whilst all this is being finalised, teachers are currently best-guessing how their curriculum needs to look like so as to lay the best foundations for learners to ultimately succeed. Another consequence of the bottom-up building of the CfW is that the Welsh Government are currently consulting on draft guidance explaining the legal requirements for a school's curriculum for 14 to 16-year-old learners under the Curriculum for Wales. The Union is at a loss as to why this was not undertaken earlier and why these requirements were not set as the substrate upon which Qualifications Wales would build upon. Now, teachers potentially face more workload and reverse-engineering of the curriculum.

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, if there is any 'raising of the bar' on the ground for determining eligibility for provision.

A factor affecting all teachers and learners in schools is the move of SEN pupils from the register and in receipt of SEN funds, to Universal Provision in schools, not in receipt of ALN funds. In theory, this concept of universality is equality based, but leads to a classroom-teaching situation, which is not supported by learning resources or appropriate Teaching Assistant input. This results in an

increased workload for all teachers as they withstand the worst of ensuring that quality learning is provided for all learners.

Chart 4: Number and percentage of pupils with additional learning needs or special educational needs in maintained schools by type of provision, 2021 to 2022 (a)



Source: Schools Census

(a) Percentages represent the percentage of all pupils with these types of SEN provision.
 (b) Individual Development Plans (IDPs) are statutory plans created under the Additional Learning Needs and Education Tribunal (Wales) Act 2018, which came into force on 1 September 2021. A learner may have either a school maintained IDP or a local authority maintained IDP.

In April 2021, there were 92,668 pupils with additional learning needs or special educational needs in maintained schools; in February 2022, this had reduced to 74,661. <https://www.gov.wales/sites/default/files/pdf-versions/2023/9/1/1695645738/schools-census-results-january-2023.pdf>.

This results in a reduction of 18,000 pupils not included in funding arrangements to support schools in the provision of learning. It also means that the needs of these learners are not being planned and tracked for comprehensively, as there is no IDP for these pupils.

Teachers reported that local authority central services are automatically rejecting initial applications for assessment or support and are then requiring the school to provide additional and overly detailed information in order to secure an assessment or support for the learner: This results in a raising of the bar.

“As we are having increasing numbers of pupils with ALN in mainstream, most of which have NO support whatsoever, up-to-date training for staff is crucial as we are trying to juggle so much.” - Teacher NASUWT ALN/SEN survey

The professional learning and other support.

The 2023 NASUWT ALN Wales 2023 survey revealed that 86.3% of respondents felt in their professional teacher opinion that ‘rates of adverse emotional personal or social issues among pupils you teach...’ had increased. This is placing added pressure on teachers in provision of support to ALN students with very low support. Worryingly, more than two thirds of respondents to the NASUWT’s ALN/SEN survey reported that they never or rarely receive the support they need to enable them to teach learners with ALN effectively.

Other factors potentially affecting implementation the ALN system, for example levels of funding and fall out from the pandemic.

ALNCo Remuneration:

The NASUWT is aware that only 10% of classroom teachers have an SEN allowance. (School Workforce Annual Census, ad hoc request <https://gov.wales/ad-hoc-stistical-requests-22-november-3-december-2021>.) ALN teachers in Wales responded in the NASUWT Big Question Survey 2023 that 84.62% felt that they were not paid at an appropriate level for their skills and level of experience as a teacher. The level of pay will impact on recruitment and retention of ALNCo’s.

It is clear from the ALN Code that the role of the ALNCo is perceived to be a strategic one. This strategic role should also be reflected in appropriate remuneration to recruit and retain highly skilled ALNCo’s to perform this role. The recent IWRPB T&F Group Report reflects the NASUWT proposal regarding remuneration. <https://www.gov.wales/pay-and-non-contact-time-additional-learning-needs-coordinators-alncos-report>.

ALNCo Workload

The NASUWT believes that adequate time must be provided to ALNCo’s in order for them to properly carry out their duties, particularly given the widely reported lack of support and training opportunities provided by many local authorities.

The NASUWT survey findings reveal that workload is a very significant issue for teachers with ALN/SEN responsibilities, which is particularly acute for ALNCo’s in Wales. In Wales, 42% of ALNCo’s stated they had more than 21 hours of teaching commitment. The average teaching commitment was 19 hours a week. As teachers must get 10% of teaching time allocated as planning,

preparation and assessment (PPA) time, this means that a substantial number of ALNCOs are not provided with any additional time for their role. Overall, 97% of respondents said they had insufficient time to carry out their duties. This can only mean that the most vulnerable pupils in Wales are not getting the support they need and deserve. (NASUWT (April 2018) *Special Educational Needs (SEN), Additional Learning Needs (ALN) and Additional Support Needs (ASN): Survey report*).

The NASUWT survey findings point to the need for substantial additional investment in ALN so that ALNCOs have the time to undertake their responsibilities for ALN. *“It is very hard to get external ALN-related support - services have been cut. There is little or no support with respect to behavioural difficulties.”* - Teacher NASUWT ALN/SEN survey 2023.

The NASUWT Big Survey 2023 ALN Wales reveals that 70.77% of respondents had seriously consider leaving their current jobs. <https://www.nasuwt.org.uk/news/campaigns/big-question-survey>.

The particular challenges and opportunities facing different types of schools in varying circumstances in terms of implementing ALN reform.

Both Welsh Government and WLGA in their submissions to the IWRPB 2024 have referred to the need for consistency across all schools in Wales, WLGA notes the extra difficulties for rural schools in finding resources to support an ALNCO post. This is without doubt an issue, and has previously been addressed through smaller schools sharing an SENCO/ALNCO.

ALNET was implemented in September 2021. The lack of consultation and research into how it would be implemented effectively has had a detrimental impact on teachers, ALNCO's, and all learners (ALN, Universal Provision, and all other learners).

ALNCO's report varying models of staff deployment in providing learning for ALN pupils. Due to the lack of consultation by Welsh Government prior to the implementation of ALNet, a thorough understanding of the needs of schools in different geographical locations, areas of deprivations, Ysgolion Gymraeg, and schools with multi- language students was never acquired. Without this understanding of the individual needs of schools it is impossible to devise a suite of models able to support implementation of this new provision to a standard ensuring equality of access to all ALN learners.