

**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 47**

**Ymateb gan: Cynhadledd Esgobion Catholig Cymru a Lloegr**

**Response from: Catholic Bishops' Conference of England and Wales**

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

## **Introduction**

The Catholic Education Service (CES) is the education agency of the Catholic Bishops' Conference of England and Wales (Bishops' Conference). The Bishops' Conference is the permanent assembly of the Catholic Bishops in England and Wales and the CES is charged with promoting and securing education on behalf of the Bishops. There are three Welsh Catholic Dioceses each with a Director of Education. There are 85 Catholic schools in Wales educating over 28,500 pupils. Catholic schools in Wales are more ethnically diverse than the national average and often serve a higher proportion of learners from disadvantaged backgrounds. Several Catholic schools in Wales were chosen to become pilot schools for the implementation of the Curriculum for Wales and the ALN system.

In order to track schools' progress and views over the consultation period, the CES created a questionnaire based on the CYPE Committee's terms of reference to gather information in alignment with the CYPE thematic check-ins. This was sent to headteachers last year and used in our April 2023 consultation response. It has since been reissued to gather data for this response and to track progress and feedback from schools during the implementation process. Questionnaire responses have been submitted by primary and secondary headteachers from across the three dioceses. The CES

has also gathered additional feedback from headteachers at monthly meetings and will continue this throughout the consultation process.

The answers to the questionnaire for this check-in indicate that confidence has grown amongst staff. However, headteachers have raised significant concerns around staff workload and funding. These themes will be elaborated upon below.

### **1. Implementation of the Curriculum for Wales in early years settings, primary schools and secondary schools**

In our first response to this consultation, staff absence and funding were listed by headteachers as their main challenges in managing the changes for the Curriculum for Wales over the last two years whilst dealing with the pandemic. Responses also indicated collaboration, professional learning and confidence with the new curriculum were challenging.

Now, headteachers are reporting that staff absences have become less of an issue and that staff have grown in confidence during the implementation process. We also noticed a reduction in the number of headteachers reporting collaboration as a challenge. All respondents to our questionnaire reported that a lack of funding remains the greatest challenge for them in their schools.

### **2. 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.**

Cluster working continues to be rated by headteachers as the best way to ensure a high level of consistency and equity of learning opportunities for pupils. Collaboration with local schools remained relatively high, but had reduced in importance. Cluster working and professional learning were considered to be high importance by headteachers. Following guidelines was also an important aspect of ensuring a level of consistency and equity of learning opportunities for pupils across Wales.

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

In 2023, 60.9% of schools said they did not feel clear about the changes associated with the reform of qualifications to align with the Curriculum for Wales. Now, 83.3% of schools said they were unclear and only 16.7% said they felt clear. They were given the option to elaborate on this question:

#### ***Concerns***

Schools would still like further clarity on what changes should look like and are looking forward to receiving further information on the finalised changes to GCSEs and how teaching through AoLEs will support children taking GCSEs. Schools would still welcome more joined-up messaging and a consistent approach shared between Welsh Government, Qualifications Wales and WJEC on the changes and their timeline. Some schools mentioned that they would like further opportunities for professional learning.

One school said that there has been a 'lack of clarity on the assessment path'. They explained that 'the contrast between the d-i-y approach to capturing progress against the centrally prescribed qualification approach at GCSE' as well as the 'lack of joining up of the needs of the curriculum at 3-14 (now already in place) with the specifications at GCSE (which are about to be released)' has been difficult.

Heads of RE in Catholic schools are concerned about the proposals for RS GCSE. Their main concern is that there is no longer a specific Catholic paper. The specifications and assessment materials are yet to be released. It is therefore difficult to judge whether the more generic approach will allow Catholic schools to fulfil the compulsory requirements of the Catholic Church's Religious Education Directory.

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

In our previous response, funding was mentioned as the greatest challenge in managing the changes for ALN over the last two years whilst dealing with the pandemic. Professional learning and confidence in implementation were also listed as challenges.

Our questionnaire results indicated that confidence had grown amongst staff and that teachers were finding staff absence and professional learning as less of a challenge since our last submission to the CYPE committee. However, funding remains an issue with 100% of respondents rating it as one of the greatest challenges for their schools in managing changes for ALN.

In 2023 none of the respondents rated the funding available as good. 17.4% rated levels as sufficient and 82.6% as insufficient. Our data suggests that schools are struggling with funding more now than in 2023. No school rated the funding available as good, 5.6% rated available funding as sufficient and 94.4% rated funding available as insufficient.

In 2023, 69.6% of schools stated they felt the progress made implementing the new ALN system in their school has been good. 21.7% said it has been steady and 8.7% said it has been slow. Now, the number of schools that stated that they felt progress made has been good has now risen to 77.8%. 16.7% said progress has been steady and 5.6% said progress has been slow. They were invited to give reasons for their answers:

### ***Positive Feedback***

A number of schools noted that confidence had grown following positive affirmation from Estyn and the Catholic Schools' Inspectorate. Many also praised the dedication of their experienced ALN Co-ordinators who have kept staff, governors and parents well-informed and attended appropriate training sessions. The delay in implementation was also mentioned and welcomed as this had enabled schools to make progress at a pace that allowed staff to deepen their understanding of the new code at a reasonable pace. Cluster working, and Welsh Government guidance has also been helpful.

*'The school has been proactive in approach, followed Welsh Gov training and implemented all guidance. We led the cluster for implementation and has also been proactive in developing links with other LA schools and developed internal training for staff.'*

*'I have a dedicated ALNCo who has weekly management time. Estyn reported that our provision was good.'*

*'We have worked closely with Welsh GOV and the LA and led the cluster towards implementation of the Act.'*

### **Concerns**

As in 2023, many headteachers highlighted they have been reliant on dedicated and resilient ALNCos to ensure they were progressing well in implementing the new ALN system. It was clear that headteachers had concerns about the workload and pressure implementation was placing on their ALNCos. Headteachers expressed concerns around the time and money limitations being placed on the school in order to release staff to carry out ALNCo responsibilities. Many said they didn't receive enough funding to allow for additional staff to assist. Some schools raised concerns that levels of support offered to staff depended on the Local Authority and that some LA's were not offering sufficient guidance and were expecting staff to complete significant pieces of paperwork. This was proving extremely time consuming and adding to the pressures already felt by staff.

*'I have a good ALNCo –but the pressure on her and the team has been huge.'*

*'We are compliant and meet our statutory obligations. Thanks to the staff progress has been good. Advice and guidance from the LA has not been so good – time consuming, paperwork not learner needs driven and over complicated.'*

*'Funds and resources stretched too thin.'*

**5. 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.**

In 2023 78.3% of headteachers indicated that comparing the application of the definition of ALN to SEN, there has been a 'raising of the bar' for determining eligibility for provision. 21.7% of respondents didn't agree. Now, 83.3% of headteachers believe that the bar has been raised. Headteachers were offered the opportunity to elaborate. Their comments suggested that schools are still facing challenges and what some schools have found useful, others have found a challenge and vice versa. The questionnaire responses indicated a greater polarisation of opinion in this area than any other.

***Positive Feedback***

Those who found a 'raising of the bar' shared that they have found the new definition of ALN to be more inclusive. The terminology used in the guidance seems to have reduced stigmas around additional learning needs for parents. Some schools suggested that this has enabled more productive conversations to happen and for better support to be implemented across home and school life.

*'The new ALN definition is far more inclusive and helps us to provide the correct level of provision.'*

*'The parents are more aware and comfortable discussing ALN. There seems to be less of a stigma around the new terminology, which means that more families are now raising concerns linked to possible ALNs and are better informed about legislation and action. We've had more requests for IDPs than we had linked to the old code and statements.'*

***Concerns***

The majority of schools continue to outline workload as the main difficulty experienced with the transfer of learners from the existing SEN system. There were still concerns about the length of time required to collate information and complete paperwork 'behind-the-scenes' such as writing IDPs. Schools still felt the workload expected with the cost of staffing was not realistic or sustainable. Some schools also mentioned that there has been a significant pressure on external agencies particularly since the pandemic which adversely impacts on schools' ability to respond to needs, provide support for parents and provide timescales to staff and parents. Examples below:

*'Money and access to support. It is hard to access because of the cost and lack of resources. Schools have alternative provisions going on post pandemic for the majority of learners in every year group – regardless of their ALN status.'*

*'We are a small school with a high number of children with IDP's the workload is immense. The ALNCo only has one day out of Class for the role currently. This will have to increase to 2 days next year to meet the demands of the role (budget is not going to provide for this). The meetings with parents are very time consuming and the paperwork is onerous, and has little impact on the needs of the child.'*

*'The capacity to release ALNCo and teachers to meet with outside agencies and parents to transfer learners to new system and also the effect on ALNCo class commitments being out of class to lead the meetings is a challenge as it impacts on all learners.'*

*'These are some of our most vulnerable learners and everyone wants to do right by them and in doing so places enormous pressures on themselves to do so. At times it has felt like it has just been dumped onto schools to sort out.'*

Some schools were concerned that the change in criteria meant some learners have not been able to access the support they require This has led to more

pressure on teachers as well as schools more generally to meet the needs of these pupils in the absence of professional development opportunities:

*'Unless you tick certain boxes you don't fit the criteria but some pupils are slower workers with no actual registered condition.'*

*'The number of pupils on the register has reduced not necessarily because the children doesn't need support but because that support is now demanded as universal.'*

*'The previous system allowed for a wider reach of the provision to those just under ALN status as it is now.'*

**6. The professional learning and other support settings are receiving to ensure effective implementation of the Curriculum for Wales and the ALN system.**

### ***Curriculum for Wales***

School-to-school learning continues to be rated by headteachers as the highest requirement for schools to successfully implement the new curriculum. Like in 2023, this was closely followed by training from the Welsh Government and local authorities. Catholic schools have appreciated professional learning provided by the CES and diocesan education officers which continues to run throughout the implementation phase. A number of headteachers also made the suggestion that training from examination boards would be helpful.

The majority of headteachers said that consortia-led learning and support as well as working with schools in their cluster are the best professional learning and training sources required by the workforce for successful implementation. A large proportion stated working with local schools had been effective.

### ***ALN System***



The majority of schools continue to list learning and training from the local authority as the most crucial professional learning and training requirement for the successful implementation of ALN reform. This is also the support they list as receiving most often. This was closely followed by learning and training from the Welsh Government and school-to-school learning. They found working with schools in their clusters helpful, as well as working with other local schools.

## **7. 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.**

### ***Curriculum for Wales***

No respondents rated the levels of funding as good. 16.7% rated it as sufficient and 83.3% as insufficient. When asked what factors may affect implementation, funding scored very highly, with 100% of all headteachers flagging this as an issue. Around 60% of respondents said cost had also been an issue. 88.9% of respondents raised staff capacity as affecting implementation, increasing from 73.9% last year. Just over 70% felt the quality of advice and guidance could be improved. This has risen from just over 60% last year.

Confidence in staff has grown by around 20% and issues arising from the fallout from the pandemic are now beginning to reduce. Catholic schools who were invited to be pioneer schools in implementing the new curriculum has felt the benefits in staff confidence and pupil progress:

*'The school was a pioneer school and then a professional partner trialling the new curriculum. Staff have a strong understanding of curriculum development and planning.'*

Catholic schools in Wales are often more ethnically diverse than the national average. Headteachers have explained that this has meant that their schools are having to deal with more EAL needs. They are also working with learners

from deprived communities which brings challenges. Equally the diversity of the families these schools serve has been a real asset to the school community:

*'There has been a large increase in EAL in our younger classes. This has meant that a lot more work is spent on language interventions. However, the increase in diversity has helped the community to understand the benefits of difference.'*

*'Poverty is a feature of our community, children have few experiences that will enhance their education outside of the school day.'*

Catholic schools are keen to embrace the Welsh language, however this has proven difficult to implement due to the lack of Welsh-speaking teachers. This is also difficult to implement when a large proportion of learners are already learning English as an additional language:

*'Delivery of Welsh – unable to procure Welsh teachers or teachers able to speak Welsh.'*

*'We live in a community where English is the predominant language, it is a mixed community with people speaking many languages – Welsh is not spoken outside of school.'*

### ***ALN System***

Schools were asked what factors may affect the implementation of the new ALN system. Nearly all schools raised funding as an issue that has affected the implementation of the new ALN system. However, staff capacity was selected by the most schools (91.3%) as the biggest issue.

73.9% raised cost as an issue, and nearly 50% of headteachers said that quality of advice and guidance could be improved. Some schools expressed a lack of confidence in coping with the new system, along with concerns around engagement with parents. The level of support and access to professional

learning were raised as areas of concern by 30% of respondents. The time required to complete IDPs was also a significant concern.

The ALNCo role has had to be redefined to include them within the wider leadership team due to the importance of the strategic role. The new system has put additional pressure on school budgets, as this is more expensive to administer.

#### **8. 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.**

The number of challenges remain consistent. In brief:

- Deprivation – Above-average proportion of learners from disadvantaged backgrounds
- Buildings – The poor condition of many Catholic schools is proving to be a significant difficulty in realising the Curriculum for Wales. This is impacting on the equity of opportunity for learners in secondary and primary schools.
- Staffing, funding and workload – Some headteachers reported difficulty in recruiting and retaining staff due to high workloads and lack of funding. This has made it difficult to implement new systems effectively.
- Meeting the needs of EAL learners
- ALNCo Capacity – The extra work that is now required to help implement changes and keep up-to-date with the new processes can be a challenge for ALNCoS that are also class teachers.
- Assessment – This has been noted as a particular challenge as staff have found it more difficult to measure progress. They would like further guidance from Welsh Government.