

Buffy Williams MS
Chair
Children, Young People and Education Committee
Welsh Parliament
Cardiff Bay
Cardiff CF99 1SN
Sent by email only

2 May 2025

Dear Buffy

Questions following annual scrutiny session

Thank you for your letter dated 3rd April, please see our response below:

Curriculum and ALN reforms

- 1. For a number of years now, developing a shared understanding of progression has been highlighted by Estyn, and acknowledged by the Welsh Government, as an area of difficulty in implementing the new curriculum. Why is this still the case, given the guidance and direction that has been issued by the Welsh Government, and are things going in the right direction or not?*

The Curriculum for Wales gives schools significant autonomy to design their own curricula. In general, school leaders welcome this flexibility, for instance to provide a curriculum that caters to their local context. However, this more open approach has led to difficulties in developing a shared understanding of progression, for several reasons. Whilst they welcome the flexibility many school leaders have indicated that they would welcome more detail around minimum expectations for pupils learning at different points.

The guidance contained within the curriculum's progression steps is intentionally broad. Therefore, interpretations of what progress should look like are not consistent across schools. This can even be the case for schools in the same cluster. Our inspection and thematic work continue to highlight that schools often interpret the guidance contained within the descriptions of learning, differently.

Welsh Government continue to update Curriculum for Wales guidance, but to date it has tended to emphasise principles rather than providing more detail, minimum expectations or exemplification. While this approach encourages innovation, it leaves room for subjective interpretation of the descriptions of learning. Without more specific guidance, schools continue to struggle to align their understanding and expectations of progression, as described within curriculum documentation.

There are differences in the level of detail contained within the different Areas of Learning and Experience (AoLE). For example, the guidance for Mathematics and Numeracy generally

Estyn, Llys Angor, Heol Keen, Caerdydd, CF24
5JW Ffôn: 02920 446446
ymholiadau@estyn.llyw.cymru
www.estyn.llyw.cymru

Estyn, Anchor Court, Keen Road, Cardiff,
CF24 5JW Telephone: 02920 446446
enquiries@estyn.gov.wales
www.estyn.gov.wales

provides more detail (although currently this is not detailed enough) in its progression steps when compared with Expressive Arts or Health and Well-being. This difference creates challenges for schools when trying to interpret the descriptions of learning. The current literacy and numeracy frameworks do not provide sufficient detail to support schools to plan for the progressive development of pupils' skills.

School leaders have noted that it is often difficult to identify updates to curriculum guidance. As the guidance is online, there is no way to see where updates have occurred or amendments have been made, as there is nothing to distinguish what is newer information.

Teachers' and leaders' understanding of effective progression and their ability to interpret and use curriculum guidance is affected by the quality and consistency of the professional learning, the support, and the advice that they receive. Variability in these areas across local authorities and regional consortia has contributed to differing interpretations of curriculum guidance and of progression. Welsh Government initiatives, such as the National Network for Curriculum Implementation aim to address shared challenges and improve collaboration, but to-date have not had a significant impact.

Ensuring effective progression in learning from age 3 to 16 requires close and purposeful collaboration between primary and secondary schools. However, this has proven difficult. Different ways of defining progression in schools, added with the difficulty of coordinating the work of multiple schools, has hampered the development of a better, shared understanding of progression in a majority of clusters. School leaders point to time and resource constraints as hindering their ability to engage well enough in developing a shared understanding of progression. Nevertheless, clusters of schools do not always prioritise or focus on this work well enough.

Welsh Government guidance outlines useful practices aimed at fostering a stronger shared understanding of progression, such as teacher groups from different schools working together to consider and evaluate examples of pupils' work. However, these practices are still not embedded well across all schools. Practitioners would benefit from having more detailed guidance of expectations for pupils' progress and learning.

Curriculum for Wales encourages schools to develop their own assessment arrangements tailored to their curricula and pupils' needs. While this flexibility is empowering, it has led to variability in how well assessment fits with a shared understanding of progression. The Curriculum for Wales emphasises assessment as a tool to support pupil progression rather than merely measuring attainment. This requires schools to focus on identifying where pupils are in their learning journey, determining their next steps, and providing appropriate support or challenges. However, aligning assessment practices with this philosophy requires a change in mindset and for schools to have a clear understanding of progression through their curriculum. The lack of a consistent understanding of progression across schools makes it difficult to ensure consistency and comparability in pupils' progress.

In summary, curriculum guidance, such as that contained within the descriptions of learning, provides a useful foundation for the curriculum. Nevertheless, further help and guidance of minimum expectations would be welcomed to ensure a stronger and more consistent shared understanding of progression across schools.

2. *You say in your foreword that schools have made good progress in implementing the new Additional Learning Needs system and complying with the legislation. However, Estyn has also said that implementation is inconsistent and pupils with ALN are not always supported well enough. Can you give us, on balance, a frank assessment of whether the needs of pupils with ALN are being identified and met?*

These findings are based on our thematic report ‘*The additional learning needs system: Progress of schools, settings and local authorities in supporting pupils with additional learning needs*,’ published in December 2024.

Our report considers how well the funded non-maintained settings, maintained primary, secondary and all-age schools that participated in the review are implementing and embedding aspects of the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (ALNET) and the accompanying Additional Learning Needs (ALN) Code. It also considers how well local authorities have supported schools.

Overall we found that:

- The requirements of ALNET are encouraging schools, settings, and local authorities to:
 - Increase support for pupils with ALN.
 - Improve understanding of pupils with ALN.
- Successful implementation of ALN reform leads to suitable progress for many pupils.
- Leaders and staff at many schools and settings are developing:
 - Inclusive culture and practice.
 - Focus on learning and well-being of all pupils.

However, the implementation of ALN reform is inconsistent, resulting in:

- Inadequate support for pupils' additional learning needs in a minority of cases, with inclusive vision and purposeful teaching and learning are not effective enough.
- Local authority guidance for improving inclusive teaching and learning is variable across Wales.
- Even in effective cases, schools acknowledge that support and guidance are at an early stage of development.
- Provision to support pupils with ALN in Welsh medium schools remains underdeveloped

Our approach to considering how the needs of children and young people with ALN are being met is contained within each of the three inspection areas of 'What we Inspect'. These areas examine the progress that these pupils are making, teaching approaches including differentiation and reasonable adjustments, the wellbeing of pupils, the arrangements to meet the care, support, and guidance needs of pupils, and the leadership of the school.

More generally, we consider the provision map within the school/provider and the training undertaken by staff. Furthermore, as part of our LGES inspections, we evaluate how well individual local authorities assess, coordinate, and implement the provision for children and young people with ALN where the LA is responsible for securing the ALP as part of an LA IDP.

We welcome the cabinet secretary for education's response in accepting all the recommendations of the most recent thematic on ALNET, including the recommendation that Welsh Government should work with all local authorities to ensure a common and secure understanding of the definition of additional learning provision, and apply it consistently.

While progress has been made in identifying and meeting the needs of pupils with ALN, there is still a significant amount of work required to ensure consistent and effective support across all schools and settings.

Post-16 education and training

3. *Your reports states that the proportion of learners in further education colleges achieving higher grades in both vocational and A-level programmes was too low. Why is this and what needs to be done, and by whom, to address this issue?*

The publication of consistent performance measures for post-16 does not place sufficient focus on the significance of A*-B grades in A levels. This grade range is frequently stipulated by universities when making offers for particularly competitive degree courses. This typically includes Russell Group universities and for courses such as medical science, veterinary medicine and dentistry.

Current consistent measures publications for post-16 in Wales show A*-A then A*-C and A*-E with no clear indicator for A*-B in the graphs. Rectifying this omission by adding A*-B alongside the existing three grade ranges will signal to school sixth forms and colleges the importance of increasing the emphasis on this grade range when setting improvement targets and evaluating their performance.

Current performance measures for post-16 vocational qualifications also do not place sufficient focus on the significance of grade outcomes. There is an over reliance on overall success rates when reporting vocational outcomes, including for level 3 qualifications such as BTEC extended diplomas and their equivalent. This does not provide parity of treatment with A level qualifications and makes it difficult to set meaningful improvement and performance targets and indicators. Action to include grade performance measures on these level 3 qualifications would help remedy this disparity.

[Consistent performance measures for post-16 learning \(achievement\): August 2022 to July 2023 | GOV.WALES](#)

Longer term the development of a set of robust value-added indicators for level 3 qualifications including A levels and equivalent vocational qualifications would help transform target setting, performance monitoring and benchmarking in post-16 education. Current approaches such as ALPS and ALIS rely on providers to input entry qualification grades and outcome grades. In order for data to be sufficiently robust and reliable to inform national publication of data there is a need to develop a system that draws existing qualification grades and eventual outcomes directly from official data stored according to unique learner numbers.

4. *The issue of completion rates of apprenticeships has come up in this year's report, as it did last year, with concerns about the health and social care sector in particular being raised both*

years. What, if any, improvements have you seen this year from last year? What factors do you think are causing this issue and who needs to be doing what to address this?

In the best cases training providers are being more robust with the support that employers give their apprentices. They are challenging employers to make sure learners have time away from the workplace to undertake theory work as is the usual practice with other learning areas. They are also challenging employers to make sure that apprentices undertake progress reviews in their employers' premises with suitable time made available. This also includes encouraging employers' managers to attend part of the progress review to contribute regarding the apprentices' progress and discuss and agree how they can give support. Providers are now better equipped to deliver the new qualifications having developed staff expertise and resources. Inspection has identified key areas for improvement in providers.

Issue cause

- Employers are not fully meeting their obligation to support their apprentices. Lack of off-the-job training activities rushed learner progress reviews and lack of manager input into progress reviews. (Providers need to be more robust regarding which employers they work with. Providers need to make employers fully aware of their obligation).
- Apprentices are often experienced in the sector and the apprenticeship is a means of achieving the required qualification. Employers often see apprentices as doing the job as their priority and the apprenticeship something to complete with little support. (as above)
- In a number of cases providers have difficulty accessing employers to undertake learner progress reviews and assessments due to staff absence and workload.

5. *Your report notes the challenges apprenticeship providers have faced due to funding cuts and states this has caused a reduction in the number of apprentices. How strongly did this come across during your inspections and what actions are providers having to take to address the reduction in funding?*

A majority of providers reported that they could not recruit the number of apprentices they had hoped to meet employer demand. This varied across learning areas and geographical regions. Providers have referred learners to other post 16 programmes, which are not always the most appropriate programmes or created waiting lists.

Other

6. *During the evidence session you spoke about what the school system is doing well, and where it needs to improve. On reflection, what do you believe are the three most important priorities for the school system as a whole at this point in time?*

- Improving attendance, in particular of eFSM pupils
- Improving the quality of teaching, particularly literacy and mathematics
- Improving the quality of self-evaluation and securing improvement

7. *You told us during the evidence session on 5 March that the Welsh Government has a role in ensuring that school leaders are held to account for how well they share good practice. Do you*

also believe that local authorities also have a responsibility in this area, and, if so, how can they be held to account for doing so, and by whom?

Local authorities in Wales can be useful in facilitating the sharing of good practice in schools and, importantly, they can be held to account for fulfilling these responsibilities.

Statutory responsibility and strategic leadership

- Local authorities (LAs) in Wales have a legal duty to promote high standards of education in their areas and ensure that schools perform effectively. This duty includes not only providing support services but also creating the right conditions for collaboration between schools, such as sharing effective teaching methods and leadership practices.
- As the tier of government closest to schools, LAs play a coordinating role to ensure that good practice does not remain siloed in individual schools.

Accountability through Estyn's Local Authority Inspections

- Estyn inspects local authority education services on a cyclical basis. During these inspections, Estyn evaluates how effectively the LA is promoting school improvement, which includes how well they encourage and support the sharing of good practice among schools.
- In its inspection reports, Estyn highlight strengths, identify areas for development, and make recommendations. If the LA is found to be underperforming or not fulfilling its statutory duties (including the sharing of good practice), Estyn can place it into a statutory category, triggering follow-up inspections and close monitoring of improvement actions.
- However, in practice, Estyn prefers to promote the sharing of good practice rather than holding providers to 'account' for not doing so. For example, in all our inspection framework where Estyn identifies good practice worth emulating elsewhere, we publish either a spotlight of good practice in our report or request a case study by the provider to place on our website.

Scrutiny by democratically elected members and the Welsh Government

- Each local authority has a cabinet or executive structure, supported by scrutiny committees made up of elected local councillors. These scrutiny committees have the power to call officers and school improvement partners to account on how they are promoting and sharing good practice across schools.
- Where an LA underperforms persistently, the Welsh Government can intervene. Under certain circumstances, Welsh Ministers may direct improvement measures, appoint commissioners, or use other powers to ensure that the authority fulfils its duties. Although these powers are unlikely to be used simply if LAs don't promote the sharing of best practice.

Role of Regional Consortia

- While LAs retain statutory responsibilities, many school improvement functions in Wales were undertaken by four regional consortia working on behalf of multiple local authorities. This partnership arrangement included the intention to spread expertise more widely and encourage

collaborative improvement projects. Any revised school improvement partnership will need to consider how this work continues in the future

- Consortia activities, such as school-to-school support programmes, leadership networks, and professional learning communities, are a key means of sharing good practice. Local authorities are expected to hold their consortia—and vice versa—to account for robustly supporting schools.

Public transparency and stakeholder engagement

- Regular public reporting by both local authorities and regional consortia (through annual reports or performance reports) provides transparency on how well they are helping schools share and implement good practice. Parents, governors, and other community stakeholders can scrutinize this information and raise concerns if they believe good practice is not being disseminated effectively.

In summary: It is important that local authorities know their schools well as they have clear responsibilities for identifying effective practice and ensuring it is shared among the schools in their areas. They are held to account through Estyn's local authority inspections, through scrutiny by elected members and the public, and potentially via Welsh Government intervention if serious concerns arise. Effective collaboration with regional consortia also reinforces this accountability structure.

Yours sincerely



Owen Evans

His Majesty's Chief Inspector
of Education and Training in Wales