
Ymateb i Ymgynghoriad / Consultation Response

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
<hr/>	
Dyddiad / Date:	03.12.25
Pwnc / Subject:	Data to monitor the additional learning needs (ALN) system

Background information about Estyn

Estyn is the Office of His Majesty's Inspectorate for Education and Training in Wales. As a Crown body, we are independent of the Welsh Government.

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary, secondary, special and all age schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and initial teacher training.

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Estyn welcomes the opportunity to respond to the Welsh Government's consultation on proposals to revise and extend data collections related to the Additional Learning Needs (ALN) system.

We support the overall aim of improving the quality, consistency, and usefulness of data to strengthen national and local understanding of how effectively the ALN system is supporting learners.

The proposed changes align broadly with the ALN and Education Tribunal (Wales) Act 2018 and the ALN Code for Wales 2021, and they are consistent with the intentions of the School Improvement Guidance: Framework for Evaluation, Improvement and Accountability (2022).

To enhance the impact of these proposals, Estyn recommends that the data strategy explicitly focuses on improving learner outcomes, equity and inclusion, rather than solely compliance. Implementation should be supported by national quality assurance, professional learning, and system interoperability.

However, the success of these proposals will depend on data integrity, consistency of interpretation and the quality assurance arrangements that accompany them.

Reliable, comparable data are essential, underpinned by clear national definitions, guidance, and quality-assurance processes to ensure accuracy across local authorities. Data should be used to support learning, reflection, and improvement rather than simply monitoring statutory compliance or performance. Information should show who provides additional learning provision (ALP), how it is delivered, to what extent, and with what impact, reflecting the structure of Individual Development Plans (IDPs).

Outcome measures disaggregated by ALN type are needed to understand progress, participation, and well-being and to evaluate how effectively provision meets learners' needs. Data on whether ALP is required and delivered in Welsh should inform progress towards *Cymraeg 2050* and ensure that Welsh is not treated less favourably than English.

Clear distinctions between local authority specialist classes and school-designated special classes are necessary to secure transparency, comparability, and equitable access for learners. While collecting data on statutory timescales and exceptions can improve accountability, this should be contextualised with factors such as case complexity and resource availability.

Information about ALNCoS should focus on the quality and influence of their role rather than their formal leadership status, with appropriate attention to workload and proportional implementation.

Consultation questions

ALN decisions

Question 1: To what extent do you agree or disagree with the proposal to collect individual level data about whether a school or local authority has made a formal additional learning needs (ALN) decision for a learner in the last 12 months?

Agree

Supporting comments:

Estyn agrees that collecting individual-level data on ALN decisions has the potential to strengthen national and local oversight of consistency and timeliness in decision-making. This will support monitoring of these aspects and enable evaluation of the volume and outcomes of decisions across Wales. However, this benefit will only be realised if accompanied by robust guidance, clear definitions, and national moderation to ensure comparability across local authorities. Welsh Government may wish to consider establishing a national validation process to assure the integrity and comparability of ALN decision data.

Support plans

Question 2: To what extent do you agree or disagree with the proposal to collect individual level data on the needs and provision of learners attending schools in Wales that have an education, health and care (EHC) plan?

Agree

Supporting comments:

Estyn supports the inclusion of data on learners with Education, Health and Care (EHC) plans who are educated in Wales, as this will strengthen national understanding of cross-border arrangements and their resourcing implications. Clear data-sharing protocols between Welsh and English authorities will be essential to ensure the accuracy and usefulness of this information.

Areas of need

Question 3: To what extent do you agree or disagree with the proposal to collect individual level data about the 4 areas of need (as outlined in the ALN Code) for learners with ALN?

Agree

Supporting comments:

Estyn agrees that collecting data on the four areas of need and associated diagnoses will enhance national understanding of the ALN profile. However, the absence of a diagnosis must never be a barrier to identifying or meeting a learner's needs.

To avoid conflating educational needs with medical or clinical diagnoses, associated guidance and recording frameworks should clearly distinguish between these concepts. It would also be helpful to remind practitioners that a diagnosis does not necessarily indicate that an individual has an additional learning need.

Estyn recommends that the Welsh Government clarify how schools should record instances where support is provided without a formal diagnosis, ensuring that this approach aligns with inclusive and person-centred practice.

Question 4: Do you have any views on the list of medical diagnoses, learning impairments and learning needs currently collected in the Pupil Level Annual School Census (PLASC) and the Educated Other than at School (EOTAS) Census about learners with ALN?

Supporting Comments:

Estyn agrees with the proposal to remove 'Behavioural, Emotional and Social Difficulties' to avoid the duplication with 'behaviour, emotional and social development' area of need.

Estyn recommends that Welsh Government clarify if the area of need for Social, Emotional and Mental Health (SEMH) needs will be added to the categories. There are a growing number of pupils and young people, particularly in Education Other Than At Home (EOTAS) provisions who are identified with this need.

Additional learning provision (ALP)

Question 5: To what extent do you agree or disagree with the proposal to collect individual level data on whether provision for learners with ALN has been secured by a local health board (as specified in their individual development plan (IDP))?

Strongly agree

Supporting comments:

Estyn strongly supports improving national data on additional learning provision (ALP), particularly where delivery is shared between local authorities and NHS bodies.

The judgment confirms that all ALP required to meet a learner's needs must be recorded in Section 2B of the Individual Development Plan (IDP), regardless of provider. Where the NHS agrees to deliver provision under sections 20–21 of the ALN Act, this must also be recorded in Section 2C.

National data systems should reflect this dual-recording requirement by capturing ALP once to describe need (2B) and, where relevant, again to show delivery responsibility (2C). This will mirror the structure of the IDP and avoid uncertainty about responsibility or funding.

Systems should clearly identify whether provision is delivered by the local authority or the NHS and include key details such as type, frequency, intensity, and language of delivery. They should also record when the NHS agrees to, declines, or ceases providing a service.

Where the NHS does not agree to deliver a service, responsibility remains with the local authority. Data systems must therefore track any changes to ensure accuracy and accountability.

Improved national data of this kind will strengthen understanding of how well needs are being met across Wales and support Estyn's inspection and thematic evaluations

by enabling analysis of timeliness, equity, and outcomes for learners receiving multi-agency support.

Question 6: To what extent do you agree or disagree with the proposal to collect individual level data on whether a learner with ALN requires some or all of their ALP to be provided in Welsh (as documented in their IDP)?

Strongly Agree

Supporting comments:

Estyn strongly supports collecting data on both the need for and delivery of Welsh-medium ALP. These data are essential for assessing progress towards Cymraeg 2050 and ensuring equitable linguistic access for learners with additional learning needs.

Estyn's recent thematic work shows that access to Welsh-medium ALP remains inconsistent. Systematic collection of data on the language of provision, capturing both where Welsh-medium ALP is required and where it is delivered, is needed to monitor Cymraeg 2050 commitments and inform strategic planning.

Welsh Government may also wish to consider introducing regional coding to map the availability and delivery of Welsh-medium ALP and identify areas where capacity building is required.

Question 7: To what extent do you agree or disagree with the proposal to collect individual level data on whether a learner with ALN is receiving ALP in Welsh (where this is required as documented in their IDP)?

Strongly agree

Supporting comments:

As per response to Q6

Question 8: Do you think there is any other information about a learners' ALP that the Welsh Government should collect to better understand equity of support and learner outcomes?

Supporting comments:

To strengthen understanding of equity and learner outcomes, Estyn recommends that the Welsh Government broaden national data collection on ALP to capture not only who provides support, but also how it is delivered, to what extent, and with what impact. This would more directly align the national dataset with Aim 5 of the ALNET Act, which aspires to “high expectations and improved outcomes for learners with ALN.”

Drawing on the ALN Code (2021) and Estyn’s thematic work (2023–24), future developments should collect a wider range of information on the quality and effectiveness of provision. This includes data on the type, frequency, and intensity of ALP; whether delivery matches what is outlined in individual development plans; and which organisations, local authorities or NHS bodies are responsible under Sections 20 and 21 of the Act.

The dataset should also record the language of delivery to identify where Welsh-medium ALP is required and provided, supporting Cymraeg 2050 and ensuring linguistic equity. Information on timeliness and continuity, when support begins and how it is maintained through transitions, would give a clearer picture of the stability and responsiveness of provision. Collecting learner progress and outcome data, disaggregated by ALN type, would enable national evaluation of how effectively different forms of support promote well-being, participation, and attainment.

Welsh Government should also clarify how universal and targeted provision are recorded to provide a full picture of the graduated response. A strengthened, legally aligned dataset of this kind would enhance national evaluation, support accountability, and drive continuous improvement in equity, inclusion, and learner outcomes across Wales.

Learners with ALN in special classes

Question 9: To what extent do you agree or disagree with the proposal to collect individual level data about whether a learner with ALN in a mainstream setting is taught in a special class?

Agree

Supporting comments:

The proposal clearly aims to improve national data on learners with ALN taught in special classes within mainstream schools. However, it does not distinguish between local authority–designated and school-designated special classes, creating a risk of inconsistent interpretation by data providers and undermining the reliability of the dataset. Estyn would welcome a stronger national data set about the number of individual pupils receiving their education in local authority designated and school-designated special classes. This would help strengthen strategic planning at a local and regional level , as well as supporting Estyn to ensure that we have the right resource to inspect any specialist provision in mainstream schools.

Estyn’s inspection evidence shows significant variation in how terms such as *complex needs* are defined and applied. In some cases, pupils with varied ALN have been placed in provisions labelled for complex needs without clear alignment to the national PLASC categories. This inconsistency distorts the national picture of need, complicates strategic planning, and obscures whether learners are receiving appropriate support.

To address this, further guidance is required to ensure local authorities and schools apply PLASC definitions consistently when recording ALN types and categorising provision. Clear national definitions, supported by practical exemplification, are essential to secure consistent interpretation.

Greater clarity and consistency will improve data reliability, support transparency, and promote fair resource allocation. This will help ensure learners are placed appropriately and that provision across Wales reflects a coherent and equitable approach to meeting additional learning needs.

Question 10: To what extent do you agree or disagree with the proposal to collect individual level data about how much time a learner with ALN spends in a special class?

Agree

Supporting comments:

The proposal aims to improve understanding of how ALP is organised across settings. Collecting data on the time learners with ALN spend in special classes could help map provision patterns, but as currently framed, the proposal is largely administrative, emphasising where learners are taught rather than the quality or impact of the support provided.

A more meaningful approach would involve provision mapping across three dimensions: need (the nature and complexity of a learner’s ALN), input (the type, frequency and intensity of support), and outcome (progress in well-being,

participation and attainment). Together, these measures would offer a fuller picture of the effectiveness and equity of ALP than time-based data alone.

Estyn considers that schools' professional judgement, supported where appropriate by local authority and health colleagues, should remain central in determining provision. Data collection should enhance, not replace, these judgements by offering national insight into patterns of support, emerging needs and learner outcomes.

Estyn recommends that the Welsh Government ensure the proposal contributes meaningfully to understanding the quality and impact of ALP, rather than functioning solely as an administrative exercise focused on placement.

Information about special classes

Question 11: To what extent do you agree or disagree with the proposal to collect data on the number of school-designated special classes in a mainstream setting (to supplement the data already collected on local authority-designated special classes)?

Strongly agree

Supporting comments:

Estyn strongly agrees with collecting data on both local authority–designated and school-designated special classes. However, this must be supported by a nationally consistent classification framework. Schools and local authorities need clear, consistent definitions of learners' ALN and the ALP they receive. A robust national approach to identifying need and classifying provision will ensure that data is meaningful, comparable, and useful in evaluating how well provision meets individual needs. This level of detail is also essential to ensuring equity for pupils whether they are taught in specialist classes or special schools. Without it, variations in provision and outcomes may be obscured.

The proposal would be strengthened by greater clarity on why this additional data is required and how it will be used to drive improvement. Schools already exercise professional judgement when organising ALP, and any new data collection must avoid undermining this or creating unnecessary administrative burden.

Estyn also emphasises that pupils with ALN should be fully included in the life and work of the school wherever possible, with meaningful opportunities to learn, socialise and take on responsibilities alongside their peers. Data on school-designated special classes should therefore be viewed as only one element of a wider understanding of inclusive practice and learner experience.

Question 12: To what extent do you agree or disagree with the proposal to collect data on the number of learners in school-designated special classes (to supplement the data already collected on the number of learners in local authority-designated special classes)?

Strongly agree

Supporting comments:

Estyn strongly supports collecting data on the number of individual learners in both school-designated and local authority–designated special classes. A consistent national approach would improve understanding of specialist provision across Wales and ensure that data reflects current practice.

Inspection evidence shows considerable variation in how terms such as *complex needs* are interpreted and how ALN categories are applied. Inconsistent use of terminology, including differences from PLASC classifications, undermines the integrity of national data and makes it harder to assess sufficiency, plan provision or analyse trends reliably.

The proposed data collection is therefore a valuable opportunity to improve transparency and accountability. Its effectiveness will depend on clear national definitions, consistent categorisation of ALN, and robust quality-assurance arrangements so that schools and local authorities record information in the same way.

Data on special classes should also indicate the type of ALN served and the nature of the ALP provided for individual pupils. This would support more meaningful analysis of whether learners are placed appropriately and whether provision is equitable across Wales.

Greater consistency is also important for parents and carers, who need clear information about the purpose, criteria and support offered in different specialist classes. Confusion in these areas can undermine confidence in placement decisions.

Estyn therefore recommends strengthening national definitions and data standards and ensuring alignment with PLASC. Reliable, comprehensive data on specialist class provision will support national planning, enhance transparency and inform Estyn’s inspection and evaluation work.

Timeliness of ALN decisions and IDP reviews

Question 13: To what extent do you agree or disagree with the proposal to collect aggregate level data on the proportion of ALN decisions made by schools and local authorities within the statutory timescales in the last 12 months (where exceptions don't apply)?

Strongly Agree

Supporting comments:

Estyn strongly supports the collection of aggregate timeliness data, provided that it is accompanied by relevant contextual information.

While the ALNET Act (2018) and ALN Code (2021) require schools and local authorities to record individual-level information to evidence compliance with statutory duties, they do not require the submission of aggregate timeliness data. National reporting would therefore represent a policy initiative rather than a new legal obligation.

Estyn would welcome further clarification on the purpose of this proposal and how the data will inform improvement. Timely identification of need and securing appropriate provision within statutory timeframes are essential to ensuring decisions are made in learners' best interests. Aggregate data could offer valuable insight into how well these expectations are being met.

Estyn suggests that timeliness data could act as a useful performance indicator for schools and local authorities. Regular reporting to governing bodies and elected members would strengthen accountability and help identify areas for improvement or effective practice. Crucially, the collection of this data should be framed as a tool to support improvement rather than solely for national scrutiny.

Estyn also encourages the Welsh Government to issue clear guidance to secure consistent recording and interpretation across settings and to establish robust validation processes at local and national level.

Question 14: To what extent do you agree or disagree with the proposal to collect aggregate level data on the number of exceptions to the relevant statutory timescales in the last 12 months?

Strongly agree

Supporting comments:

Estyn strongly agrees that collecting aggregate data on the timeliness of ALN decisions and reviews would strengthen monitoring of statutory compliance and highlight variation across local authorities. However, quantitative data alone cannot provide a full picture. It should be supported by qualitative information that explains delays, including case complexity, access to specialist assessments, and local service capacity.

Estyn recommends that the Welsh Government introduce standardised fields for recording these contextual factors. This would enable more meaningful analysis, promote consistency across local authorities, and support a culture of learning and continuous improvement rather than one focused solely on compliance.

Question 15: To what extent do you agree or disagree with the proposal to collect aggregate level data on the proportion of IDPs reviewed by schools and local authorities in the most recent statutory 12-month period?

Strongly agree

Supporting comments:

See response to Q13

It may also be helpful to collect data on the proportion of IDPs discontinued/no longer needed following review. Although for many learners, it can be expected that once their ALN and required ALP have been identified they are likely to continue to require an IDP, it should be expected that sometimes needs change over time and often IDPs are continued anyway.

ALN Coordinators

Question 16: To what extent do you agree or disagree with the proposal to collect individual level data on whether an ALN Coordinator (ALNCo) in a setting is on the senior leadership team or not?

Agree

Supporting comments:

Estyn agrees that collecting information on whether ALNCoS are part of senior leadership teams could provide useful insight into the strategic capacity of settings to plan and oversee ALP. This data may help inform workforce planning, professional learning and the evaluation of leadership structures across local authorities. However, it should be used to support improvement and capacity building, not to judge individual or institutional performance.

What matters most is the quality and influence of the ALNCo's work, not their formal position within the leadership hierarchy. Effective ALNCoS contribute strategically to inclusion and learner progress regardless of whether they sit on the senior leadership team.

Estyn also highlights potential unintended consequences. Schools may feel pressured to place ALNCoS on senior leadership teams for compliance reasons, and in some cases the ALNCo may be a qualified teacher who is not employed as a teacher in the school. Such variations must be taken into account to ensure proportionate and accurate interpretation of the data.

Clarification is also needed on how the proposal applies to maintained special schools, which are not required to appoint an ALNCo. Consideration should be given to how ALN leadership responsibilities in these settings will be captured to ensure a coherent national picture.

Workforce implications**Question 17: What effect will the proposed changes to ALN data have on the workforce, including any impact on workload?****Supporting Comment:**

Estyn recognises that the proposed changes to ALN data collection could strengthen national understanding of provision, improve consistency and support strategic planning. However, these benefits will only be realised if implementation is proportionate and sensitive to existing workforce pressures.

Additional data requirements may increase the workload of school staff, particularly ALNCoS, whose roles already encompass coordination, compliance and communication. Collecting and validating new data, such as timeliness, class designation or leadership roles, could divert capacity from direct support if not well integrated into existing systems.

To mitigate this, data processes must be streamlined, digital systems user-friendly, and expectations clearly communicated. Welsh Government should provide clear guidance on definitions, coding and validation to reduce duplication and minimise administrative burden.

Estyn emphasises that the greatest value will come when data collection supports professional reflection, self-evaluation and improvement rather than compliance alone. Data should inform local authority planning, professional learning and national policy review, ensuring that any additional workload leads to meaningful insight and improved outcomes for learners with ALN.

General

Question 18: Do you have any other comments on the data that should be recorded or that we should collect to monitor and understand the effectiveness of the ALN system in supporting learners with ALN?

Supporting Comment:

Estyn notes that the lack of outcome data disaggregated by ALN type is a significant gap. Without this detail, datasets such as the All-Wales Core Data Set (AWCDS) limit schools' and local authorities' ability to analyse attainment and progress for specific groups, such as learners with autism or sensory impairments. This weakens self-evaluation, strategic planning and the sector's ability to identify which types of provision are most effective.

Aim 5 of the ALNET Act aspires to high expectations and improved outcomes for learners with ALN. The current proposal does not explain how this ambition will be measured. Without clear outcome indicators linked to learner progress and achievement, it will be difficult to assess whether the reforms are delivering this central aim.

Estyn recommends introducing outcome measures disaggregated by ALN type in future data developments. This would support more precise analysis of learner progress and a clearer understanding of how well different forms of ALP meet individual needs.

Estyn also highlights the need for clear national quality-assurance protocols to ensure consistency and reliability, and for combining quantitative and qualitative evidence to provide a fuller picture of learner experiences and outcomes. Together, these improvements would strengthen the sector's ability to evaluate impact, identify effective practice and drive continuous improvement across the ALN system.

Mandatory

Question 19: What, in your opinion, would be the likely effects of the proposed new data about the ALN system on the Welsh language? We are particularly

interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Supporting comments:

Estyn supports the proposal to collect data on whether ALP is required and provided in Welsh. This information will be essential for monitoring progress towards Cymraeg 2050 and assessing the availability and quality of bilingual ALN provision across Wales.

To maximise its value, the dataset should enable analysis of regional variation in Welsh-medium ALP. This would help identify gaps and inform strategic planning by local authorities and the Welsh Government. Estyn also recommends using the findings to share effective practice across regions and settings, promoting equitable access to Welsh-medium ALP for all learners who need it.

Question 20: In your opinion, could the proposed new data about the ALN system be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

Supporting comments:

Estyn believes that, if well designed, the proposed ALN data collection could support the promotion of the Welsh language and ensure that Welsh is not treated less favourably than English. Including specific fields on learners' and parents' language preference, the language of assessment, the language of ALP delivered, and any mismatch between these would provide valuable evidence for planning and improvement.

Disaggregating timeliness data by language would help identify delays in securing Welsh-medium provision, while information on the availability of Welsh-speaking specialists—such as ALN Cos, educational psychologists and therapists—would highlight workforce capacity needs. Aligning these data with Cymraeg 2050 and local WESPs would further strengthen national and local planning.

All data systems, guidance and validation rules should be fully bilingual and avoid 'English-by-default' coding, with clear prompts to record language preferences and provision details. Quantitative data should be supported by qualitative context, particularly where complexity or specialist availability affects timeliness.

Embedding these language elements within existing systems would minimise administrative burden while providing richer evidence to support improvement. Taken together, these measures would help promote Welsh-medium ALP, ensure linguistic parity, and use data as a tool for system learning rather than compliance alone.

Question 21: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Estyn supports the overall direction of the consultation and welcomes the aim of strengthening the evidence base for improving provision for learners with ALN. It would be helpful to provide clear messages about how local and national government should make appropriate use of the data to support improvement

However, a few considerations must be addressed to ensure the data collected is robust, meaningful and used effectively. These considerations include:

- developing a strong national quality-assurance processes. Consistent definitions, recording and validation across local authorities and settings are crucial for producing accurate and comparable national data;
- ensuring that diagnostic information does not become a gatekeeper to support. While accurate identification is important, data collection should not limit access for learners whose needs do not align neatly with formal diagnostic categories.
- providing further clarity on how universal, targeted and specialist provision will be captured, ensuring that data reflects the full continuum of support.
- clear and explicit distinctions between local authority–designated and school-designated special classes to promote transparency and equity.
- reinstating or further developing outcome data disaggregated by ALN type. This would support more precise analysis of learner progress and the effectiveness of different types of ALP.

Estyn remains committed to working with the Welsh Government and partners to ensure that the development of ALN data collection continues to promote learning, transparency and system-wide improvement.

Although this consultation does not consider post-16 settings or non-maintained nursery settings, it will be important to consider how these settings should be taken

account of in the data collection. For example, in terms of data about reviews of local authority maintained IDPs, this may want to consider how any variations in relation to different types of settings.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: