

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Data to monitor the additional learning needs (ALN) system
Department:	Education Directorate
Start Date:	July 2025

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

Title of Proposal:

Proposed data to monitor the additional learning needs (ALN) system

1. Policy objectives

Background

The Welsh Government is committed to creating an inclusive education system where all learners, including those with additional learning needs (ALN), are supported to participate fully in and have access to high-quality education in maintained schools. This includes the move to the ALN system alongside implementation of the Curriculum for Wales which aims to break down barriers for all learners and give teachers more flexibility to best meet the individual needs of each learner. These are supported by a whole school approach to mental health and wellbeing.

The ALN system, which is underpinned by the Additional Learning Needs and Tribunal (Wales) Act 2018 (ALNET Act 2018) and the ALN Code for Wales 2021 will be implemented by August 2025, following a phased approach over four years between September 2021 and August 2025. The system supports children and young people in Wales, from 0 to age 25, with ALN. It is replacing the Special Educational Needs (SEN) system and the system for supporting young people with learning difficulties or disabilities (LDD).

The objectives of ALNET and an assessment of how it would promote children's rights were considered during the development of the ALNET Bill. A [children rights impact assessment \(CRIA\)](#) was published as part of a [suite of impact assessments](#) in December 2016 when the Bill was introduced, and were revised during the Bill's legislative scrutiny. A further [CRIA](#) considering the impact of the qualifications and functions of the Additional Learning Needs Coordinator (ALNCo), as prescribed in regulations, was published in November 2020.

To undertake its core role and functions, the Welsh Government receives personal and special category data on children and young people directly from schools, early years providers and local authorities as part of statutory data collections. This includes information about a child or young person's SEN or ALN. The Privacy Notice at [Annex A](#) provides further information on these collections including what data the Welsh Government receives, the lawful basis for collecting it and what the Welsh Government does with the data.

What decision are we considering?

The Welsh Government and responsible bodies such as schools and LAs need a range of information to effectively support learners with ALN so they can meet their full potential, as well as monitor, evaluate, and improve the ALN system. This includes data about children and young people with ALN, the support they receive and data about the delivery of the ALN system.

The ALN data that schools and local authorities (LAs) record and share with the Welsh Government, needs to be updated to align with ALN policy and legislation. We are proposing to update data to ensure that the Welsh Government and responsible bodies such as LAs and schools, have relevant, appropriate and meaningful data about the ALN system to:

- monitor the performance of the ALN system and its outcomes, ensuring it is meeting the needs of children and young people and can be continually improved
- understand how well duties under the ALN legislative framework are being met
- inform evidence-based strategic planning and policy decisions
- enable stakeholders to effectively implement and manage the best possible provision to support their learners
- provide meaningful information and reporting on ALN to benefit the education sector and stakeholders

This CRIA is on the draft changes to the ALN data the Welsh Government receives through statutory data collections. It assesses the impact of these changes on children and young people. Information about the data we are proposing local authorities and schools record, and the Welsh Government collects, is set out in the consultation on the data to monitor the ALN system.

2. Gathering evidence and engaging with children and young People

Existing research and data on children and young people with ALN

There is already a breadth of information and evidence being used to monitor implementation of the ALN system and its intended aims and to inform policy making. This data has underpinned analysis and insight into ALN implementation.

SEN and ALN data is already collected through various internal and external sources. Existing data sources include, Welsh Government education data collections, data from Further Education Institutions (FEIs) and work-based learning training providers, and early years data published by Care Inspectorate Wales (CIW). Some of this information is individual level data, while some is collected at aggregate level.

Minor changes were made to the Welsh Government statutory data collections to reflect the introduction of the ALN system ahead of its implementation. For example, the Pupil Level Annual School Census (PLASC), the Educated Otherwise Than At School (EOTAS) and the School Workforce Annual Census (SWAC) now collect information about children and young people with individual development plans (IDPs) and ALNCOs.

The Welsh Government shares SEN and ALN data broadly to support the sector and provide transparency. We include it in the All Wales Core Data Sets (AWCDS) provided to schools and local authorities to support their self-evaluation and improvement. We also publish it through official statistical releases, including some which link ALN data to other datasets, for example analysis of absenteeism or GCSE Key Stage 4 outcomes by ALN, and on StatsWales and at school level on the My Local School website.

Arad Research are carrying out a four-year research project, commissioned to assess the effectiveness of the implementation of the ALN system and identify any barriers or facilitators to implementation, and consequently, to identify measures that could be put in place to support implementation and realisation of policy objectives. The “[Evaluation of the Additional Learning Needs System: Scoping Report](#)” includes the findings of a data mapping process which examined the data available in relation to the inputs, activities, outcomes and impacts set out in the Theory of Change for the ALN system.

As part of this work, in March 2025, the Welsh Government published a [report on a survey of practitioners and professionals](#). The most recent focus has been to conduct a survey to gather the views and experiences of parents and carers of the ALN system. The survey closed on 17th April with over 1,900 participants and the data is currently being analysed with the expectation that a report will be published in the autumn.

Estyn has published two thematic reports on the implementation of the additional learning needs (ALN) system in Wales. The first was published in [September 2023](#) and the second was published in [December 2024](#). Estyn continue to monitor the ALN system across their inspection work.

Children in Wales (CiW) has been awarded funding to promote and raise awareness of children’s rights and the United Nations Convention on the rights of the child and the optional protocols in Wales. For learners with ALN, this relates specifically to an ‘ALN Ambassadors’ programme for enabling participation and gathering the views of children and young people with ALN. This project is spread across three years and year two (2023-2024) involved ongoing work with learners at four different settings (including primary, secondary and Welsh medium). The findings of the ALN Ambassadors programme will be considered as part of this impact assessment.

As well as the above a range of evidence and stakeholder intelligence has been explored to monitor implementation. These have not all been directly focused on children and young people but they all reference impacts relating to children and young people. These include:

- ALN Reform National Steering Group
- Estyn in its role as education and training inspectorate for Wales
- National ALN Implementation Leads
- The National Academy of Educational Leadership Wales
- SNAP Cymru
- TSANA
- Association of Directors of Education in Wales (ADEW)

- Engagement with sector representatives and Trade Unions

Seeking the views of stakeholders

To support the development of a proposed ALN data set, engagement was carried out with local authorities, a small representation of ALNCos, Estyn and Welsh Government policy officials in Autumn 2024. This highlighted challenges with the existing data as well as eliciting suggestions of ways to ensure the data was better able to support schools and local authorities in monitoring and improving the ALN system and provision to support learners with ALN to reach their potential.

We will formally consult on the proposed ALN data in late summer/autumn 2025. The consultation will aim to seek feedback from all stakeholders who survey, record, maintain and/or use the data the Welsh Government collects and then publishes about the ALN system. This includes practitioners, leaders, LAs and partner organisations such as Estyn and Qualifications Wales. It also includes those working in the third sector or research, who use the published information, and suppliers of school and LA management information systems (MIS) or other educational software solutions.

Additionally, we will publish a version of the consultation aimed at the learners whose information the Welsh Government receives, their parents or carers and anyone else who is interested in the subject of this consultation.

We will use ALN communication platforms to publicise the consultation to representatives from schools, local authorities and other stakeholders who use published ALN data, many of whom are connected to children and young people. We will highlight the consultation to parents/carers through existing relationships with third sector partners and representative groups.

We will engage with children and young people during the consultation period to seek their views on the data we are proposing to collect. We are exploring meaningful options to do this, including for example, through ALN Coordinators.

3. Using this research, how do you anticipate your policy will affect different groups of children and young people, both positively and negatively?

The proposed changes to statutory ALN data collections will enable a more granular and inclusive understanding of learner experiences across diverse groups. Welsh Government data and wider evidence and research, highlights how different groups of children with ALN may be affected by the proposed changes. For example, research by the University of Bristol shows that age significantly affects the likelihood of being identified with ALN, with younger children being less likely to be identified; various research and data which shows learners eligible for Free School Meals (FSM) are likely overrepresented among those with ALN; and research from Durham University which shows girls are significantly less likely to be identified with Special Educational Needs (SEN). Further detail on how different groups of children or young people may be impacted is included in the accompanying Equality Impact Assessment (EIA), published in draft alongside this CRIA.

Introducing individual-level data, for example, on ALN decisions and provision, will have a disproportionate positive impact on children and their families living in socio-economic disadvantage, some ethnic minority children, disabled children, younger children, girls and boys. The Welsh Government will be better positioned to monitor how ALN learners from these groups are identified and supported within the ALN system. This enhanced visibility will support efforts to identify disparities in access to support and ensure that the implementation of the ALN system promotes equity and consistency across all learner groups. This data will help to inform future policy and legislation to improve practice and outcomes of children with ALN.

While we have not yet engaged directly with children and young people on the proposed changes, we are exploring meaningful options to engage with children and young people with ALN during the consultation period, to ensure we hear their views, e.g. engagement through ALNCos. We will also highlight the consultation to parents/carers, including for example through SNAP Cymru, and are engaging with representatives from schools, LAs and other agencies many of whom are directly connected to children and young people.

The Welsh Government will consider the views collected when finalising the changes to the ALN data which is recorded and collected.

The CRIA is a draft and should any other unidentified issues arise from the consultation, the CRIA will be amended to reflect this.

4. Analysing the evidence and assessing the impact

We want to ensure that the Welsh Government and responsible bodies such as schools and LAs have a range of information to effectively support learners with ALN so they can meet their full potential, as well as monitor, evaluate, and improve the ALN system.

The impact on children and young people of introducing the proposed ALN data is anticipated to be positive in that it will ensure the Welsh Government, schools and local authorities have the right information to support learners with ALN meet their full potential, as well as monitor, evaluate and improve the ALN system.

An Equality Impact Assessment (EIA) has been undertaken alongside this CRIA to assess the potential impact of the proposals on individuals with protected characteristics, including learners with additional learning needs (ALN). This assessment considered the intersectionality of characteristics such as disability, age, and language preference, and how these may influence access to support and outcomes under the ALN system. The EIA ensures that due regard has been given to the Public Sector Equality Duty and that equality considerations are embedded throughout the development of this policy.

The CRIA will also be reviewed alongside any future proposals for change.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 2 (non-discrimination) The Convention applies to everyone whatever their race, religion, abilities, whatever they think or say and whatever type of family they come from.	X		The proposed changes to statutory ALN data collections will enable a more granular and inclusive understanding of learner experiences across diverse groups. By introducing individual-level data, for example, on ALN decisions and provision, the Welsh Government will be better positioned to monitor how ALN learners from different ethnic backgrounds, socio-economic contexts, and other protected characteristics are identified and supported within the ALN system. This enhanced visibility will support efforts to identify disparities in access to support and ensure that the implementation of the ALN system promotes equity and consistency across all learner groups.

Article 3 All organisations concerned with children should work towards what is best for each child.	X		The proposed changes, include collecting data on whether provision for learners with ALN has been secured by a local health board. This evidence will help us evaluate and understand the demand for health intervention, but also how the multi-agency approach to ALN is being implemented and how that may impact on learners success and engagement with education.
Article 6 All children have the right of life. Governments should ensure that children survive and develop healthily	X		
Article 12 Children have the right to say what they think should happen, when adults are making decisions that affect them, and to	X		We will ensure that we engage with ALN learners in a meaningful way during the consultation process. In addition, we will provide a consultation version aimed at learners and their parents/carers to ensure they have an opportunity to provide feedback on the proposed data collection.

have their opinions taken into account.			
Article 13 Children have the right to get and to share information as long as the information is not damaging to them or to others.	X		The privacy notice for the data collections sets out children and young people's right, under the GDPR, to access the personal data that the Welsh Government is processing about them.
Article 16 Children have a right to privacy. The law should protect them from attacks against their way of life, their good name, their families and their homes.	X		The Welsh Government statutory data collections collect important information about children and young people. Their data is kept safe and secure by the Welsh Government as set out in the Welsh Government's Privacy Notice for statutory data collections . Safeguards are in place to ensure learners will not be identifiable through the publishing of data associated with ALN. Data items will be suppressed if they are disclosive.

<p>Article 23</p> <p>Children who have any kind of disability should have special care and support so that they can lead full and independent lives.</p>	X		<p>The Welsh Government is committed to creating an inclusive education system where all learners, including those with additional learning needs (ALN), are supported to participate fully in and have access to high-quality education in maintained schools. This includes the move to the ALN system alongside implementation of the Curriculum for Wales which aims to break down barriers for all learners and give teachers more flexibility to best meet the individual needs of each learner. These are supported by a whole school approach to mental health and wellbeing.</p> <p>See Article 2 on how the proposed data collection will support this.</p>
<p>Article 28</p> <p>Children have a right to an education. Discipline in schools should respect children's human dignity. Primary education should be free. Wealthy countries should help poorer countries achieve this.</p>	X		<p>See Article 2.</p>

Article 29 Education should develop each child's personality and talents to the full. It should encourage children to respect their parents, their own and other cultures and the environment.	X		See Article 2.
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5. Ministerial advice and decision

The CRIA will be signed off by our Head of Support for Learners Division and the analysis will be used to inform our advice to the Cabinet Secretary for Education for approval ALN data consultation. The CRIA will accompany the MA when sent to the CSE.

6. Communicating with Children and Young People

We will publish a summary of responses to the consultation and will work with Communications colleagues to draw attention to and make available to children and young people. We will also share the findings through the ALNCos who engage with children and young people as part of the consultation process.

7. Monitoring and Review

This CRIA will be reviewed following the consultation as we finalise the ALN data collection. Should this result in a need to amend our proposals, the reviewed CRIA will be submitted to the Cabinet Secretary for Education, to support ant amended proposals.

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