

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT – EQUALITY IMPACT ASSESSMENT

Data and information consultation – integrated impact assessment – Equality impact assessment (EIA)

Policy title and purpose:	Changes to ALN data
Department:	Education
Date:	April 2025
Name of Branch:	ALN Policy Team, Support for Learners Division

1. Introduction - Purpose of the EIA: Explain why the assessment is being conducted.

The Welsh Government is initiating a consultation on proposed changes to the information and data it receives about children and young people's additional learning needs (ALN) and the ALN system to align with the [Additional Learning Needs and Education Tribunal \(Wales\) Act 2018](#) (ALNET Act 2018) and the [ALN code for Wales 2021](#).

ALNET was introduced in 2018, and implementation of the system began in 2021. It will be fully operational by August 2025, replacing the Special Educational Needs (SEN) system and the system for supporting young people with learning difficulties or disabilities (LDD). The Welsh Government published an [Equality Impact Assessment](#) for ALNET and its objectives in 2018.

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. The Welsh Government needs to review and update the data it collects from local authorities and schools to effectively deliver, monitor, evaluate, and enable a self-improving ALN system. Collecting the right information is vital to ensure learners with ALN can be effectively supported to meet their full potential.

It is proposing to update the information it receives about children and young people's ALN, the ALN system and the workforce through the relevant statutory

school data collections to enable it to:

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

The draft changes aim to the data ensure the Welsh Government receives relevant and justifiable data to achieve the objectives above, by:

- removing legacy SEN fields from the data collections
- amending SEN fields which remain relevant to ensure they reflect the ALN framework
- adding new fields to further strengthen the Welsh Government's ability to achieve the objectives highlighted above

The proposed changes will impact the Pupil Level Annual School Census (PLASC), Educated Otherwise than at School (EOTAS), and School Workforce Annual Census (SWAC).

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.

This Equality Impact Assessment (EIA) will evaluate the potential impacts of these proposed changes on various groups, ensuring that the new data collection methods promote equality and inclusivity within the ALN system. A summary of responses from the consultation will be published.

2. Background

Our proposed changes set clear expectations for the use of data and information and are designed to help cultivate an appropriate and proportionate use of data across the school system. These changes focus on what is important and where it can drive improvements for all learners.

The proposed changes are not expected to have a differential impact on learners with protected characteristics, beyond the positive impacts expected for all learners because of a more balanced and improved use of data and information that is squarely focussed on improving outcomes for learners.

Our proposals have a strong focus on providing data in context and reflecting challenges faced by different learners and schools. We are committed to an approach where information is relevant, timely, high-quality, and contextualized, offering a comprehensive picture of a school and fairer consideration of outcomes. This approach respects the individual needs of diverse settings and considers the characteristics of a school's cohort of learners.

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

The ALN policy team carefully considered how to ensure the proposed changes were meaningful and consistent and data collection is legal, justifiable and does not place additional burden on schools and local authorities. The work will provide support to schools in managing their information by defining data requirements as appropriate and explore facilitating commercial software development that allows schools and local authorities to record data for their own purposes in a consistent and meaningful way.

3. Stakeholder Engagement

We recognise that any changes to ALN data collected through statutory data collections could impact multiple stakeholders. We will be undertaking a consultation on these specific proposals. To ensure a comprehensive and inclusive approach, the Support for Learners Division/ALN Policy team have carried out in Autumn 2024 a series of meetings (pre consultation) with a wide range of stakeholders who are responsible for or represent the interests of children and young people with ALN. These discussions provided further insight into the limitations of the current data and opportunities for improvement.

This engagement included:

- **Local Authorities:** The ALN Policy team engaged with local authorities to understand the regional implications of proposed changes to school data collections. This helped ensure that local needs and contexts were considered, particularly in relation to the direct impact on learners with ALN. Local authorities also contributed suggestions for how data could better support monitoring and improvement of ALN provision.
- **Schools:** The ALN Policy team engaged with schools to understand to gather their views, understand their operational needs, and explore the practicalities of delivering ALN data through both statutory and non-statutory collections. Schools provided valuable feedback on how data could be used more effectively to support learners with ALN.
- **Policy Officials:** A survey was distributed to relevant policy officials to ensure that any proposed changes align with existing policies and do not create unintended consequences. Their input also helped shape the proposed data changes for a more useful ALN dataset.
- **ALN Coordinators (ALNCos):** A small group of ALNCos were consulted to provide practitioner-level insight into the challenges and opportunities presented by the current data landscape. This engagement provided suggestions for how the data could be better used to support schools and local authorities in monitoring and improving the ALN system and provision, ultimately helping learners with ALN to reach their potential.
- **Estyn:** The ALN policy team engaged with Estyn to identify ways to improve the ALN data Welsh Government collect. Their input provided suggestions to strengthen the dataset to better support inspection, evaluation, and continuous improvement of ALN provision.

By conducting these pre-consultation meetings and surveys, the Support for Learners Division demonstrates a commitment to inclusivity and compliance with the Equality Act, ensuring that the needs and rights of children and young people with ALN are at the forefront of policy development.

The ALN Policy team also set up Internal Working Group (IWG) to ensure the identification of the ALN data required in school and local authority MIS software is managed effectively. Members provide their expertise, ensure consistency, engage with stakeholders, and facilitating efficient policy decision-making. The group report to the project Senior Responsible Officer (SRO) and ALN Programme Board and update the ALN Steering Group and other relevant groups as needed.

The IWG reviews and considers the impact of changes on interrelated policy areas and stakeholders, ensuring that new data collection aligns with other existing policies and do not create conflicts. Members provide expert advice, engage with their own stakeholders, and lead specific strands of work where necessary. The group also

provides input to the consultation and provide comments during important stages in defining the ALN changes.

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.

4. Identify the data sources used for the assessment.

To support our Equality Impact Assessment, we have drawn on Welsh Government data from the Pupil Level Annual School Census (PLASC) and wider research which linked in this table. This helps us assess whether groups may be disproportionately affected by policy changes. This evidence base will inform our assessment of potential impacts.

The proposed data collection 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. Strengthening data collection will have a positive impact on these groups of children as the Welsh Government will be better positioned to monitor how ALN learners from these groups are identified and supported within the ALN system. This data will help to inform future policy and legislation and improve practice and outcomes for learners with ALN.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision	Evidence
Age (think about different age groups)	This Bristol Working Paper Quantifying the Impact of Additional Learning Needs Identification in Wales 2024 on ALN in Wales shows that age significantly	Improvements to the ALN data collection enables better tracking of learners' progress over time. This helps in understanding how interventions at	We will be undertaking a consultation on the proposed changes, will be an opportunity for children and young people to comment

	<p>affects the likelihood of being identified with ALN. Younger children are less likely to be identified, possibly due to delayed assessments. It uses data to track how ALN identification changes as learners age.</p> <p>The proposed changes should result in a positive impact. By improving data collection on additional learning needs (ALN), we can better support learners of all ages. This comprehensive data will enable us to evaluate the effectiveness of interventions at different stages of life, ensuring that educational and developmental outcomes are optimized for each age group. For instance, tracking learners' progress over time will help us understand how early interventions impact long-term success, while also identifying the needs</p>	<p>different ages impact long-term educational and developmental outcomes.</p>	<p>on the information we propose to collect. There will be an easy read version for them to collect.</p> <p>A separate Children's Rights Impact Assessment has been completed.</p> <p>ALNco focus groups to engage with CYP.</p>
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	of older learners who may require different types of support.		
Socio-economic Disadvantage. Free School Meals	<p>Research shows learners eligible for Free School Meals (FSM) are likely overrepresented among those with ALN.</p> <p>This shows in PLASC data where learners with ALN are almost twice as likely to be from low-income households and also data from Pupils educated outside school (EOTAS) which also shows high FSM eligibility. This highlights a strong correlation between additional learning needs and socio-economic disadvantage</p> <p>This is also shown in research by the Health Foundation Inequalities in support for special educational needs by free school meal eligibility The Health Foundation which confirms this trend, showing FSM-eligible pupils</p>		

	<p>are twice as likely to receive SEN support or have an Education, Health and Care (EHC) plan.</p> <p>This research suggests the intersection between poverty and ALN, suggesting that socio-economic disadvantage may increase both the likelihood of ALN identification and the complexity of support needs.</p>		
Disability/impairment	<p>Disabled learners may face barriers to identification and support within the ALN system. Research from the University of Cambridge also shows that children with disabilities experience lower educational outcomes and reduced quality of life in school settings. Children with disabilities are being denied equal opportunities for a quality education across the world, including in the UK University of</p>	<p>The proposed changes to the school data collection will allow further monitoring of the ALN act which places duties on local authorities National Health Service bodies to ensure all children and young people have their needs met.</p>	<p>The consultation will also be available in an easy read format, and in large print, Braille and alternative languages on request. We are also considering version for those with BSL. This ensures that everyone, regardless of their abilities or disabilities, can access information, services, and opportunities.</p>

	<p>Cambridge. These findings reinforce the need for ALN policies to ensuring disabled learners are equitably identified and supported.</p> <p>The proposed changes are likely to have a positive impact, as disability-related data will be considered in changes to school data collections. New ALN fields in PLASC and improvements to the EOTAS census will enhance how needs are recorded.</p>		
Gender Reassignment (the act of transitioning and Transgender people)	<p>Research from University of Cambridge Transgender and gender-diverse individuals are more likely to be autistic and report higher autistic traits University of Cambridge shows that transgender and gender-diverse individuals are more likely to be autistic and experience mental health challenges.</p>	<p>The proposals align with Welsh Government's broader equality commitments, including the LGBTQ+ Action Plan outlined in Transgender A-Z 2023.docx which promotes safety, inclusion, and authenticity for all gender identities.</p>	

	<p>Therefore, ALN policies that are inclusive of neurodivergent learners could have a disproportionately positive impact on trans individuals by addressing overlapping needs and improving access to support.</p> <p>The proposed changes to the ALN system are designed to support all children and young people with Additional Learning Needs, regardless of gender identity. While the proposals are not gender-specific, they are inclusive by design and aim to remove barriers to learning for every learner, including those who are transgender or undergoing gender reassignment. By focusing on individual needs and potential, the reforms promote equity and ensure that transgender learners are not disadvantaged in accessing support or</p>		
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	achieving their educational goals.		
Pregnancy and maternity	<p>Nursing and Midwifery Council Additional care for women and newborns with complications - The Nursing and Midwifery Council and Brunel University research Implementing and evaluating resources to support good maternity care for parents with learning disabilities: A qualitative feasibility study in England shows that women with learning disabilities face significant barriers during pregnancy and postnatal care, including stigma, lack of tailored support, and poor communication.</p> <p>These findings underscore the need for ALN systems to be inclusive of parental learners and learners with caregiving responsibilities, ensuring that pregnancy or maternity does not</p>	<p>The reforms are built on the principle of meeting the unique needs of each learner with ALN. This includes those who may be pregnant or have recently become parents. No adverse impact has been identified for this group, and the proposals are expected to enhance flexibility and responsiveness in support planning, which may be particularly beneficial for learners managing pregnancy or maternity alongside their education.</p>	

	<p>limit access to support or participation in education.</p> <p>The proposed changes to the ALN system are designed to be inclusive of all learners with Additional Learning Needs, regardless of their pregnancy or maternity status. While the proposals are not specifically targeted at this group, they ensure that support is based on individual needs and circumstances. This approach helps to safeguard equitable access to education and support for young people who are pregnant or new parents.</p>		
Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)	<p>Research from the University of Cambridge Autism rates have increased and show differences in ethnic minorities and links to social disadvantage University of Cambridge shows that autism rates vary across ethnic</p>	<p>The proposals align with Welsh Government's anti-racism commitments and inclusive consultation practices.</p> <p>Having the proposed data will help WG track how various races with ALN are affected.</p>	

	<p>groups, with Black and Chinese pupils more likely to be diagnosed, and Roma/Irish Traveller pupils least likely. University of Oxford research Ethnic minority children not equally identified with Special Education Needs University of Oxford adds that Asian pupils are under-identified with autism, while Black Caribbean pupils are over-identified with SEMH needs. These disparities—unexplained by socio-economic factors—highlight the need for ALN systems to ensure fair access to support.</p> <p>Gypsy Roman Traveller learners face persistent barriers in education, including lower identification and support for ALN. A national good practice guide ttm-good-practice-guide-for-improving-outcomes-for-grt-children-in-education.pdf highlights that GRT</p>		
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	<p>pupils are at higher risk of exclusion, under-attainment, and disengagement, often due to cultural misunderstanding, mobility, and lack of trust in services.</p> <p>The ALN proposals aim to support all learners equitably, regardless of racial or ethnic background. While not race-specific, they are designed to remove barriers and promote inclusion for learners from diverse communities.</p>		
Religion, belief and non-belief	<p>The Bristol University paper Inclusive Education in Wales: Interpreting Discourses of Values and Practice Using Critical Policy Analysis shows how values and beliefs, including religious perspectives, are interpreted within the Welsh education system. While not focused solely on ALN, it highlights how faith-based views can shape attitudes toward</p>	<p>The consultation process has been shaped by inclusive engagement practices such and stakeholder mapping to ensure accessibility for all communities.</p>	

	<p>learning needs, inclusion, and support. This is relevant when considering how ALN provision is perceived or accessed by families of faith.</p> <p>The ALN proposals are designed to be inclusive of all learners, regardless of their religion, belief or non-belief. The reforms focus on individual needs and do not disadvantage learners based on their faith or belief systems.</p>		
Sex / Gender	<p>Research from Durham University Girls less likely to be diagnosed with special educational needs</p> <p>shows that girls are significantly less likely to be identified with Special Educational Needs (SEN) only one-third of identified learners in 2022–23 were girls. This is supported by research from the University of Cambridge Autism</p>	<p>The proposals align with Welsh Government's broader equality commitments, including the LGBTQ+ Action Plan outlined in Transgender A-Z 2023.docx which promotes safety, inclusion, and authenticity for all gender identities.</p>	

	<p>rates have increased and show differences in ethnic minorities and links to social disadvantage University of Cambridge shows that boys are significantly more likely to be diagnosed with autism than girls. These findings support the need for ALN systems to be gender aware, ensuring both boys and girls are fairly assessed and supported.</p> <p>A 2023 study by University College London (UCL) Significant rise in ADHD diagnoses in the UK UCL News - UCL – University College London found that ADHD is significantly more common in boys than girls, with diagnoses among boys aged 10–16 rising from 1.4% in 2000 to 3.5% in 2018. Boys are also more likely to be prescribed ADHD medication. These trends suggest that boys are more</p>		
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	<p>readily identified with certain ALN, particularly neurodevelopmental conditions. However, the study also highlights concerns about under-diagnosis in deprived areas, where boys may face longer waits or lack access to private assessments.</p> <p>The ALN proposals are designed to support all learners based on their individual needs, regardless of sex or gender. The reforms are not gender-specific but are inclusive by design, ensuring equitable access to support for both girls and boys, as well as learners of diverse gender identities.</p>		
Sexual orientation (Lesbian, Gay and Bisexual)	<p>This Bristol academic paper Quantifying the Impact of Additional Learning Needs Identification in Wales Knight 2024.pdf provides a statistical analysis of</p>	<p>The proposals align with Welsh Government's equality commitments and inclusive practices.</p>	

	<p>ALN identification in Wales. It focuses on understanding how ALN status is distributed and could be cross-referenced with demographic data on LGBTQ+ learners to identify disparities.</p> <p>No negative impact has been identified for this group. The ALN proposals are designed to be inclusive of all learners, regardless of sexual orientation. The reforms focus on individual needs and do not differentiate based on who a learner is attracted to, ensuring equitable access to support for lesbian, gay, bisexual, and other learners.</p>		
Marriage and civil partnership	<p>No negative impact has been identified for this group. The ALN proposals are designed to support all learners based on their individual needs, regardless of marital or partnership status. While this characteristic is</p>	<p>The proposals are inclusive by design and align with the Welsh Government's broader equality duties.</p>	

	more relevant in employment contexts, the reforms do not create any barriers or differential treatment for learners or staff based on whether they are married or in a civil partnership.		
Learners with Additional Learning Needs	The proposed changes should have a positive impact on learners with ALN by ensuring there is qualitative and quantitative data and information to be used by Welsh Government in a way that supports efforts to achieve the best for ALN learners. The ALN proposals are specifically designed to improve outcomes for children and young people with ALN. They aim to ensure that all learners—regardless of diagnosis, background, or setting—receive the support they need to overcome barriers to	The education reforms are grounded in the principles of inclusion, equity, and the social model of disability. They reflect feedback from the ALN legislative review and are supported by a robust programme of data improvement and stakeholder engagement. The Welsh Government is looking to change and update the school data collections PLASC and EOTAS to ensure the ALN system is responsive, transparent, and consistently applied across Wales.	<p>A separate Children's Rights Impact Assessment has been completed for learners with ALN to be able to access.</p> <p>Easy read version with simplified questions.</p> <p>Engagement with learners will be facilitated via their ALNCo and supported by ALN policy team during consultation period.</p>

	learning and reach their full potential.		
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5. Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights? (Please refer to point 1.4 of the EIA Guidance for further information about [Human Rights](#) and the [UN Conventions](#)).

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Protocol 1: Article 2: The right to education	The proposed changes to the ALN school data collections will have a positive impact, by supporting Welsh Governments requirements to monitor, evaluate and improve the implementation of the new ALN system. It will support efforts to achieve the best for our ALN learners.	A separate Children's Rights Impact Assessment has been completed and has found that these proposals will have a positive impact.	

6. Mitigation - Outline steps to reduce or eliminate negative impacts.

- The easy read version of the publication aims to enhance understanding of the reforms for children, young people, and families with Additional Learning Needs (ALN). It also empowers them to voice their opinions on matters that impact them. By collaborating with Learning Disability Wales, the Support for

Learning division ensured that the document was crafted by experienced individuals, making it easily accessible for children and young people.

- We have considered and created various ways for stakeholders and members of the public to respond to the consultation to ensure everyone, regardless of their abilities or disabilities, can access information, services, and opportunities. This includes a smart survey form, email and post.
- The consultation will also be available in an easy read format, and in large print, Braille and alternative languages on request. We are also considering version for those with BSL. This ensures that everyone, regardless of their abilities or disabilities, can access information, services, and opportunities.
- We are sourcing a supplier to organise focus groups with local authorities and schools to ensure comprehensive engagement with key stakeholders. By procuring an experienced supplier for these groups, we aim to gather valuable insights and feedback from those who may be impacted the most by the changes to the school data collections and to address any local concerns.
- We are in the process of sourcing a supplier who will be responsible for analysing the consultation responses. This is to ensure that the analysis is conducted in an unbiased approach, thereby maintaining fair and impartial results.
- To ensure children and young people's voices are heard during the consultation we are exploring meaningful options to engage with children and young people with ALN during the consultation period, e.g. through ALNCos.

7. Decision Making - Recommendations: Provide recommendations based on the findings and state the final decision regarding the policy or practice.

Declaration

The proposal is anticipated to be a positive impact on equality issues.

The proposed changes to the data collected through PLASC and the EOTAS census will be used to provide an accurate picture of the number of children and young people with Wales with ALN and their needs. Protected characteristics have been considered and there should be no negative impact.

