

Summary Integrated Impact Assessment:

Consultation on additional learning needs data

Version one, date: July 2025

SECTION 1

What action is the Welsh Government proposing and why?

Background

The Welsh Government are proposing to update data to ensure that the Welsh Government and responsible bodies have relevant, appropriate and meaningful data about the ALN system.

The ALN system, is underpinned by the Additional Learning Needs and Tribunal (Wales) Act 2018 (ALNET Act 2018) and the ALN Code for Wales 2021 which outlines the statutory duties for local authorities and education settings. This 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 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.

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 (LAs) as part of statutory data collections such as the Pupil Level Annual School Census (PLASC) and the Educated Otherwise Than At School (EOTAS) Census. This includes information about a child or young person's SEN or ALN. The [Welsh Government Privacy Notice](#) 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.

Some initial amendments were made to the PLASC and EOTAS Census ahead of the 2021/22 academic year to support the introduction of the ALN system. For example, the Welsh Government (WG) introduced codes for maintained settings to record if a pupil has a school maintained Individual Development Plan (IDP) or local authority maintained IDP. However, most SEN-related fields were retained to avoid multiple changes during the transition period. As a result, the current data collections remain largely based on the SEN legislative framework.

Proposed Action

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 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 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

The data proposals we are consulting on underpin the system approach to collaborative working, partnership and support which is in line with the approach to using data and information to support learning and improvement in education. Our proposals are in line with the principles set out in the recent consultation on the [use of school and learner data to support learning and improvement](#), and will enable stakeholders to record and use data that is:

- required by them to carry out their functions and support workforce efforts to achieve the best for learners
- meaningful to the ALN system and its delivery

The data we collect should have a clear purpose and support and enhance understanding without placing unnecessary additional burdens upon the workforce. It should also improve the data capture and self-evaluation process for the sector.

Long Term

Monitoring long-term trends brought about by the ALN system through this proposed data set will inform policy making, legislation, practice and funding requirements going forward. This aims to have a long-term impact on children and young people with ALN.

To support the development of a proposed ALN data set, officials have considered the data required, alongside wider sources of evidence, to monitor the short, medium and long-term outcomes of the ALN system, as identified in Arad Research's [Evaluation of the ALN system scoping report](#). Collecting this information through statutory data collections ensure that we have high quality, comprehensive data to monitor trends and disparities in information related to the ALN system over time. Monitoring long-term trends brought about by the ALN system will inform future policy and legislation to improve practice and outcomes of learners with ALN.

The Welsh Government hopes to introduce new ALN data items into the management information systems from September 2026. The intention is to amend the ALN PLASC data capture from September 2026 onwards to inform provision planning.

Prevention

Early identification of ALN and the timely delivery of interventions are central to ensuring children and young people with ALN can succeed and have access to an education which meet their needs. Amendments to the data collection will support strategic planning and effective monitoring to facilitate early, timely and appropriate interventions to reflect learners needs.

Integration

This proposal supports the Programme for Government's commitment to improving outcomes for learners with ALN and is integrated across government priorities in education, health, social services and local government. It aligns with the well-being goals of a more equal Wales and a prosperous Wales. By improving the quality and relevance of ALN data, the changes will support better planning, funding, and

delivery of services across education, health, and social care. The revised data collections will also contribute to the Welsh Government's broader digital transformation and evidence-based policymaking agendas.

The proposal has been developed in consultation with internal policy and data teams and aligns with the Education Directorate's strategic objectives. It also supports the work of Public Service Boards by enabling more accurate local-level data on learner needs.

Collaboration and Involvement

To support the development of a proposed ALN data set, the Welsh Government engaged with local authorities, a small representation of school practitioners including ALN Coordinators (ALNCOs) and school representatives, Estyn and relevant Welsh Government departments.

Engagement highlighted challenges with the existing data. It highlighted the need to ensure it is aligned with the ALN system and supports LAs and schools strategic planning. The engagement elicited 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 to reach their potential. It also highlighted the need to ensure comprehensive and accurate data to support the work of partners, such as Estyn, in carrying out their roles effectively.

We plan to carry out further engagement during the consultation period to elicit feedback on the proposals, impact on school practitioner and LA workload, and delivery options to ensure the final data set is practical, proportionate and aligned with operational needs. The Welsh Government is committed to ensuring that the revised collections do not create unnecessary burdens and that stakeholders are supported through clear guidance and training.

The consultation will provide further opportunities for wider stakeholders to provide feedback on the proposed ALN data. Importantly, it will also be an opportunity to seek the views of learners whose information the Welsh Government receives, their parents and carers. We will provide accessible versions of the consultation and are exploring meaningful options to engage with learners with ALN.

Impact

Updating the ALN data is essential in ensuring the data is aligned with the ALN system and that Welsh Government and responsible bodies, including LAs and schools, can effectively support learners with ALN to meet their full potential and monitor, evaluate and improve the ALN system.

Impact on learners

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.

It will aim to provide some evidence to better understand and evaluate, for example:

- to what extent there is a bilingual ALN system in place and the impact of a bilingual ALN system on support learners to reach their potential
- how the multi-agency approach is being implemented and how that may impact on learners' success and engagement with education
- to what extent the needs of learners in 'special classes' are being met, and the outcomes of these learners
- the resources and provision available for learners with ALN across Wales, and the demand and capacity across the system
- whether the system is working fairly and effectively, and to assess the feasibility of statutory timeframes, and how they impact on learners' outcomes

The proposed changes to statutory ALN data collections will also enable a more granular and inclusive understanding of learner experiences across diverse groups. 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 different groups and 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. This data will help to inform future policy and legislation to improve practice and outcomes of children with ALN.

Further information is included within the Children's Rights Impact Assessment and Equality Impact Assessment published alongside this document.

Impact on the delivery partners

Local authorities and a small representation of school leaders and ALNCoS have been engaged in the initial development of the ALN data proposals. In developing the proposed new ALN data, we have applied the principles that any new data the Welsh Government collects should support and enhance understanding without

placing unnecessary additional burdens on the workforce. Where possible these changes will improve the data capture and self-evaluation process for the sector.

The proposed data aims to ensure an efficient process for recording and managing ALN system data, in a standardised way, to support schools and LAs. It aims to provide information which schools and LAs need to deliver their functions, for strategic planning, and to effectively implement and manage the best possible provision to support their learners.

It also aims to ensure the Welsh Government has information to be better placed to understand the impact of the ALN system on LAs, schools and learners, for example by better understanding the resources and provision available for ALN learners across Wales, the demand and capacity across the system, and the feasibility of statutory timeframes and how they impact on learner outcomes.

The Welsh Government is aware that when new data items are introduced, there may be initial additional data capture for ALNCos or other school practitioners and ALN teams in LAs. Some proposed data items may also require schools or LAs to record additional data which may impact on workload. We have included a question on workforce impact in the consultation and plan to use further engagement sessions during the consultation period to explore potential impact, delivery options and tools to support the workforce such as guidance and training.

Costs and Savings

The proposal is not expected to incur significant new costs. However, it is possible that there will be some small financial implication to local authorities and schools due to the proposed ALN changes, depending on their contractual arrangements with their Management Information Software (MIS) supplier (there are several suppliers operating in Wales). This may vary by school/LA depending on their existing contracts. The Welsh Government is keeping MIS suppliers informed of proposed changes through existing mechanisms such as the Supplier Development Forum.

Mechanism

Sections 537A and 569(4) of the Education Act 1996 provide the lawful basis for the Welsh Ministers to collect 'such individual pupil information as may be prescribed'. The sections are the enabling powers for the following regulations:

- the Education (Information About Individual Pupils) (Wales) Regulations 2007 (Schedule 2, Part 1, Paragraph 9A and 15)
- the Education (Information About Children in Alternative Provision) (Wales) Regulations 2009 (Schedule 1, Para 4A)

Sections 114 and 120 of the Education Act 2005 provide the legal basis for the collection of information about the school workforce through the Education (Supply of Information about the School Workforce) (Wales) Regulations 2017 (Schedule, Regulation 5). The information collected must be used for a 'qualifying purpose' which includes 'evaluation, planning, research or statistical data'.

Amendments will be needed to the Education (Information About Individual Pupils (Wales) Regulations 2007 and the Education (Information About Children in Alternative Provision) (Wales) 2009 regulations to enable the Welsh Government to collect some of the proposed ALN data.

All the changes to ALN data will be reflected in guidance which we intend to issue ahead of the new data being introduced.

Section 8

Conclusion

How have people most likely to be affected by the proposal been involved in developing it?

To support the development of a proposed ALN data set, the Welsh Government has engaged with local authorities, a small representation of school practitioners including ALN Coordinators (ALNCOs) and other school representatives, Estyn and relevant Welsh Government departments.

Initial engagement focused on identifying the limitations of the current data collections and understanding what information is needed to support effective monitoring and implementation of the ALN system. Stakeholders provided feedback on the practical implications of proposed changes, including the removal of legacy SEN fields and the introduction of ALN-specific data items.

We plan to engage further with local authorities and practitioners during the consultation period, to ensure that any changes to the data collections are proportionate, meaningful, and do not create unnecessary burdens. Welsh Government is committed to minimising bureaucracy and ensuring that the revised data collections support, rather than hinder, the delivery of high-quality provision for learners with ALN.

We are also exploring meaningful options to engage with learners with ALN to seek their view on the proposed ALN data changes. The views of parents and carers will also be gathered through the public consultation.

What are the most significant impacts, positive and negative?

The most significant positive impact of the proposed changes to the ALN data is ensuring the Welsh Government, LAs and schools have the right data to effectively implement and manage the best possible provision to support learners with ALN to reach their potential.

The proposed data will mean the revised collections reflect the ALN system and enable more meaningful analysis of learner needs and provision. This will support more effective policy development and strategic planning at both national and local levels. It will also help ensure that schools and local authorities are equipped with the data they need to deliver high-quality provision and to continually improve.

A potential negative impact is the risk of increased workload for school staff and local authorities during the implementation of the new ALN data, which we will explore further during the consultation. There is also a risk of unintended consequences of from collecting data which can drive practice. For example, collecting data on meeting statutory timelines for IDP's might not drive quality of the content of an IDP.

We anticipate gathering further evidence on potential impacts through formal consultation and reflecting on these before further revisions of proposals are made as appropriate.

In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

The proposals support the Programme for Government wellbeing objective to 'continue our long-term programme of education reform, and ensure educational inequalities narrow and standards rise'. It will also help us deliver and evidence the commitment to implement the ALN Act.

The proposals contribute broadly across the well-being goals, most specifically towards a Prosperous and More Equal Wales through helping support a society that enables learners to fulfil their potential regardless of their additional learning needs or circumstances. The proposed data should enable stakeholders to effectively implement and manage the best possible provision to support learners. The proposed changes to statutory ALN data collections will also enable a more granular and inclusive understanding of learner experiences across diverse groups. The Welsh Government will be better positioned to monitor how ALN learners from different groups and protected characteristics are identified and supported within the ALN system.

The proposal also supports the ALN system aim to deliver provision for ALN learners in Welsh wherever possible, and to provide an inclusive education, where all pupils access common opportunities in ways relevant to their needs and which ensures they fully belong to the school community. These contribute towards the goals of a Wales of Cohesive Communities and Thriving Welsh Language.

As set out previously, the data proposals we are consulting on underpin the system approach to collaborative working, partnership and support which is in line with the approach to using data and information to support learning and improvement in education. Our proposals are in line with the principles set out in the recent consultation on the [use of school and learner data to support learning and improvement](#). We are clear that data we collect should have a clear purpose and support and enhance understanding without placing unnecessary additional burdens upon the workforce. It should also improve the data capture and self-evaluation process for the sector.

How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The next step is to carry out a public consultation on the proposals. Following the close of the consultation, we will consider responses and confirm arrangements for next steps. The Welsh Government is aiming to introduce the proposed changes to the ALN data from September 2026. However, this will be subject to consultation feedback, the completion of the changes to the information regulations (where required) and the complexity of change required within MIS systems.

Once introduced, the impact of the revised data collections will be monitored through regular engagement with Welsh Government analysts, LAs, schools and wider stakeholders. Further methods of evaluation will be considered to monitor the impact of the data.

