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Consultation – summary of response

Data to Monitor the additional learning needs (ALN) System

February 2026

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

This report outlines the responses gathered from the Welsh Government's consultation on proposed new data items related to learners with additional learning needs (ALN) provision, and the education workforce in maintained schools and non-school settings. The consultation ran for a period of eight weeks between October and December 2025.

Action required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Data to monitor the additional learning needs \(ALN\) system | GOV.WALES](#)

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Glossary

Acronym/Key word	Definition
ALN	Additional learning needs
ALNCo(s)	Additional learning needs co-ordinator(s)
ALN Code	Additional learning needs code for Wales 2021
ALP	Additional learning provision
EOTAS	Education other than at school
FEI	Further education institution
IDP	Individual development plan
LA	Local authority
LHB	Local health board
MIS	Management information system
PLASC	Pupil Level Annual School Census
PRU	Pupil referral unit

Introduction

About the consultation

This document presents the findings from the Welsh Government's consultation on ALN data collection in local authority-maintained schools and non-school settings across Wales. The findings of this consultation will inform the future ALN data recorded by schools and LAs and collected by the Welsh Government through statutory data collections.

The set of proposed new ALN data for local authority-maintained schools and non-school settings to record, and the Welsh Government to collect, were developed following pre-consultation engagement with relevant local authority officers, a small representation of school practitioners, Estyn and Welsh Government policy officials in Autumn 2024. The Welsh Government also considered the data required to support wider sources of evidence in monitoring the short, medium and long-term outcomes set out in the [Evaluation of the ALN system scoping report](#). The data relates to:

- individual children and young people with ALN and their needs attending maintained education settings in Wales or who are in education other than at school (EOTAS).
- ALN provision and delivery of the system within maintained education settings.
- individual level data on the education workforce (ALN Coordinators) in maintained settings.

For the purposes of the consultation, local authority-maintained schools mean a community, foundation or voluntary school, or a community or foundation special school not established in a hospital, and a maintained nursery school. EOTAS provision is funded by LAs and is delivered in different ways including through pupil referral units (PRUs), independent providers and local authority home tuition services.

Next Steps

The Welsh Government will carefully consider all responses received through the consultation. Where proposals have raised questions or concerns, Welsh Government are assessing what changes may be required to the proposed data items and identifying any areas where further work is required.

Where appropriate, the Welsh Government will make necessary amendments to the information regulations which provide the legal basis to collect the data, and these will be formally laid before the Senedd. There will also be accompanying guidance to reflect the feedback received.

The Welsh Government will also review all the evidence submitted in areas where respondents highlighted the need for greater clarity, reduced administrative burden and definition of special classes. These insights will inform the refinement of the proposed data items and help shape future policy. This will ensure that any changes remain workable for schools and local authorities while strengthening the ALN system, ensuring that policy and delivery continue to be underpinned by accurate, consistent and timely data.

This marks the first stage of the wider improvements we are making to statutory data collection systems, so we all have relevant and meaningful ALN data to monitor system performance, meet legislative duties, and support all ALN learners to improve outcomes.

Methodology and analysis

This section outlines the approach taken to gather and analyse responses to the Welsh Government's consultation, [Data to monitor the additional learning needs \(ALN\) system](#).

Consultation process

The consultation was conducted over eight weeks, from 8 October 2025 to 3 December 2025. The consultation consisted of twenty-one questions developed by the Welsh Government additional learning needs (ALN) policy team. The consultation was designed to be accessible and inclusive, comprising:

- a consultation questionnaire
- a simplified questionnaire for learners
- a simplified questionnaire for parents and carers
- a British Sign Language (BSL) version of the consultation
- eight focus groups with participants from LAs and schools.

Survey Design

The questionnaire included:

- Fifteen closed questions seeking the views of respondents on each of the proposed data items. The questions ask the respondent to indicate the extent to which they agree or disagree with the proposal (using a Likert scale). An open text comments box was also provided after each of the closed questions to enable respondents to add any supporting comments.
- Six open text survey questions to enable respondents to provide feedback and views on specific areas, such as existing data items and the impact of the proposed changes on the workforce and workload, or to provide any feedback that respondents hadn't been able to add within consultation questions.

Profile of online consultation respondents

A total of 99 responses were received to the online consultation. Over half (48) were from the education workforce, with 17 from LAs and 14 from parents or carers. Four of those responses were submitted after the consultation closed. All responses, including those submitted late, were reviewed and considered in the preparation of this report. A full breakdown is provided below.

A full list of respondents to the online survey, excluding those who asked to remain anonymous, is provided in Annex A.

Table 1: Profile of respondents (n=99)

Category of respondent	Number of responses
Education workforce	48
Local authority	17
Other	16
Parent or carer	14
Third sector	4
Learner	2
Supplier	2
Health practitioner	2
Academic or researcher	2
Total	99

Note: Respondents could select more than one category above. 'Other' respondents included individuals from stakeholder organisations, school governors and FEIs.

Focus groups

A total of 36 individuals participated in eight focus group discussions. Respondents were offered the option of participating in either a Welsh or English language group and were allocated according to their language preference. Two of the eight groups (one local authority group and one school group) were conducted in Welsh.

LA participants: Five groups included participants working in LAs (covering data management and ALN policy roles) with 25 participants from 15 different LAs.

Education workforce participants: Three groups included a total of 11 participants working in schools (all were ALN Coordinators or supported ALN provision). Across the three school groups the mix of settings included 1 English-medium secondary school; 1 Welsh-medium secondary school; 1 bilingual all-through school; 7 English-medium primary schools and 1 Welsh-medium primary school.

Each discussion lasted approximately 60 minutes. Participants were presented with the same proposals outlined in the consultation document and invited to offer their response to them. Focus group participants also had the opportunity to respond to the online written consultation documents, although it is unknown how many focus group attendees also offered a written response.

Analysis of consultation responses

Quantitative analysis of the closed questions

Frequency totals were produced for each of the 15 closed questions posed as part of the consultation to outline the extent to which respondents strongly agreed, agreed, neither agreed or disagreed, disagreed or strongly disagreed with each proposal.

Analysis of the supporting comments

Thematic analysis of the qualitative data (comments submitted by respondents to the open-text questions) took place with each response reviewed, relevant codes or themes identified, and each answer was assigned a code or codes by the research team, with coding cross-checked between team members.

The coding framework comprised around a dozen themes for each question, developed from an initial review of responses and was refined as coding progressed. Each response to an open question was labelled with the relevant code(s) for the themes or points raised. Reviewing these codes allowed the themes raised most frequently in the consultation responses to be identified.

As well as analysing the themes reported across all responses, differences in how frequently themes were raised by respondents from different sectors (see Table 1) were considered. Where relevant, these differences are reflected within the qualitative summaries.

Analysis of focus group feedback

Notes and transcripts from the eight focus groups were reviewed in full. Points raised were coded using the same framework applied to the online consultation responses, ensuring consistency across both sources. Where relevant, the points raised by education workforce participants and those raised by LAs are reported separately.

Reporting the findings

This report sets out the most frequently raised themes arising from the responses to the consultation. The themes and points set out throughout this report are derived from comments made by respondents to the consultation and do not represent the views of the authors of the report nor Welsh Government.

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?

Table 2: Responses to Question 1

Response category	Number of responses	Percentage of responses (%)
Strongly agree	42	44
Agree	37	39
Neither agree nor disagree	11	11
Disagree	2	2
Strongly disagree	4	4
Total	96	100

n=96

Of those who completed the question, 82% (79 out of 96) agreed or strongly agreed with the proposal, 11% neither agreed nor disagreed, and 6% disagreed or strongly disagreed.

42 respondents provided written comments in response to question 1.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The data would help improve understanding of and inform implementation of the ALN system. For example, it was recognised that the data will:
 - provide a more accurate picture of how many learners require additional support. This would highlight trends in the numbers of ALN pupils in mainstream settings.
 - help inform planning budgets and resource allocation.
 - allow for better tracking of learner outcomes and system accountability.
- Concerns were raised around the need for consistent reporting and the accuracy of data. Comments highlighted the need for clarity on how this data should be collected and recorded, including robust guidance and clear definitions. A query was raised relating to how/which ALN decisions would need to be recorded. For example, whether it would include counting a reconsideration for a learner where a previous decision of ‘no ALN’ was made.
- The need for a consistent approach to collecting the data was raised. Some comments suggested that the data is already collected, but that there needs to be a more consistent approach to collecting the data to ensure it is accurately reported and to reduce administrative burden.

- Respondents emphasised the importance of communicating the purpose of collecting this data.

Among those who neither agreed nor disagreed, the most frequently raised themes were similar to those outlined above.

Among those who disagreed with the proposal, the most frequently raised themes were:

- Concerns were raised that this data might be interpreted in a way that unfairly compares schools or LAs.
- Concerns that a potential administrative burden could arise from having to collect/record this data.

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- Collecting this data was a good idea.
- Collecting this data is important because it would provide a fuller picture of learners.
- The data tends to already be collected by LAs, but across different systems/platforms. However, LAs indicated that where the outcome of decisions was that no IDP was required, this outcome is not currently recorded/collected and would therefore require some additional data collection.
- Schools may already be collecting this information, but probably in inconsistent ways. Consideration of the different systems used across schools and LAs would be needed when implementing the proposal.
- This data would only provide a partial picture of the time and resource taken for each decision, as this could vary considerably.
- Separate collection processes may be required for decisions relating to local authority-maintained and school-maintained IDPs.

Participants from schools noted that:

- They generally agreed with the proposal but had some concerns about who would be responsible for collecting this data and how.
- There is a need for clearer guidance on collecting this data to ensure consistency of recording.

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?

Table 3: Responses to Question 2

Response category	Number of responses	Percentage of responses (%)
Strongly agree	45	47
Agree	35	36
Neither agree nor disagree	12	13
Disagree	0	0
Strongly disagree	4	4
Total	96	100

n=96

Of those who completed the question, 83% (80 out of 96) agreed or strongly agreed with the proposal, 13% neither agreed nor disagreed, and 4% strongly disagreed.

36 respondents provided written comments in response to question 2.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The data would help improve understanding of and inform implementation of the ALN system. For example, it was recognised that the data will:
 - provide an accurate picture of EHC needs.
 - strengthen national understanding of cross-border arrangements and their resourcing implications.
 - support resource planning and monitor provision of resources to support learners.
- In some cases, this data is already collected. Respondents, therefore, questioned whether this proposal may lead to duplication of work. Conversely, one respondent noted that there was currently no clear means to identify learners with EHC plans in schools.
- Respondents outlined how they thought this data could be collected and the importance of the need to have a consistent approach across Wales. For example, it was explained that if this data was to be collected, it would need to be formalised in the school's data collection systems. It was also stated that this data would not be an issue to collect as long as MIS systems have the capacity to record it.

Among those who neither agreed nor disagreed, the most frequently raised themes were similar to those outlined above. It was also noted by some of these respondents that this proposal would not have a direct impact on them.

Among those who disagreed with the proposal, the most frequently raised themes were:

- This data would only be a snapshot in time and may potentially be out of date a short period of time after it is collected and recorded.

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- They generally agreed that collecting this data was a good idea, particularly for LAs sharing a border with England (several noted that this proposal would not affect many learners in their area).

Participants from schools noted that:

- The data would be valuable to collect.
- The data would help inform planning of resources and provision for learners.

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?

Table 4: Responses to Question 3

Response category	Number of responses	Percentage of responses (%)
Strongly agree	50	52
Agree	36	38
Neither agree nor disagree	6	6
Disagree	1	1
Strongly disagree	3	3
Total	96	100

n=96

Of those who completed the question, 90% (86 out of 96) agreed or strongly agreed with the proposal, 6% neither agreed nor disagreed, and 4% disagreed or strongly disagreed.

38 respondents provided written comments in response to question 3.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The data would help improve understanding of and inform implementation of the ALN system. For example, it was recognised that the data will:

- provide an overview of trends, particularly where needs are increasing.
- inform funding required to ensure the right support to be provided.
- inform training and personal development requirements for education practitioners.
- support accountability and evidence-based policy decisions.
- offer a more accurate and quantifiable picture of learner profiles and the pressures faced by schools to support learners.
- Importance of clearer definitions of the areas of need and clarity around what would need to be recorded e.g. whether it would be just primary needs or primary and secondary needs. Guidance would be required to support this clarity.
- Data needs to be collected in a consistent way to ensure accuracy.
- Concerns that collecting this data could have an impact on workloads.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- The need for thorough engagement with stakeholders to ensure other areas of need are included and not overlooked.
- The data would be feasible to collect through MIS systems.

Among those who disagreed with the proposal, the most frequently raised themes were:

- Rather than placing learners into categories of need, it is important to consider a holistic picture of a learner.

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- They generally agreed that collecting this data was a good idea.
- That the data could help inform planning and provision in local areas by identifying trends in learner needs.
- The data tends to already be collected by LAs.

Participants from schools noted that:

- There needs to be a change in the collection of data related to learner needs and the data proposed to be collected aligns with the ALN Code, IDPs, and current school practices.
- They had some concerns or queries around collecting this data. Concerns related to:
 - the usefulness of the data to inform planning.
 - whether the expectation would be to record main/primary need or potentially more than one.

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?

61 respondents provided written comments in response to question 4.

Some respondents noted that they considered the list was comprehensive and did not need changing. It was also suggested that this data helps to inform planning of provision.

However, a larger proportion raised points of concern relating to the list or suggested it should be amended. Among those who provided comments, the most frequently raised themes were:

- Greater clarity is required in relation to the items on the list. Examples included:
 - more clarity around the type of medical diagnoses required to be recorded.
 - clear definitions for listed items to mitigate the risk of incorrect recording of data.
 - clear communication to individuals collecting/recording the data that a formal diagnosis should have been provided to record the data.
- The list is outdated and does not align with the ALN Code and the 4 areas of need. However, a small minority said information about medical diagnosis should be recorded.
- Proposed changes to specific items on the list, for example:
 - suggestion to separate physical and medical needs
 - suggestion that the term Moderate Learning Difficulties covers too broad a spectrum
 - additional items to be included in the list: Acquired brain injury (ABI), dysgraphia, sensory processing needs should be a separate category.
- The list does not cover all medical diagnosis. It was suggested that an 'other' category could be included, with an option to specify or provide further details.
- Concerns that individuals who have a diagnosis but do not meet the criteria for ALN would not be captured in this data.

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))?

Table 5: Responses to Question 5

Response category	Number of responses	Percentage of responses (%)
Strongly agree	48	51
Agree	33	35
Neither agree nor disagree	9	9
Disagree	1	1
Strongly disagree	4	4
Total	95	100

n= 95

Of those who completed the question, 85% (81 out of 95) either agreed or strongly agreed with this proposal, 9% neither agreed nor disagreed, and 5% disagreed or strongly disagreed.

52 respondents provided written comments in response to question 5.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The data would help improve integration and joint working practices between schools and LHBs – or at least emphasise the need for improved joined-up practices.
- That ALP delivered by health boards is not always recorded and that collecting this data would reduce some of the communication challenges that some respondents felt currently exists between schools / LAs and LHBs.
- A need for this data to improve accountability relating to who is responsible for delivering ALP and highlight the additional burden taking on the responsibility of supporting health care needs of learners with ALN can place on the education workforce.
- The data would help outline the number of health-related ALP requests made by schools, LAs and individual families that lead to provision and therefore the potential gap between provision and need.
- Questions were raised within the comments as to who should gather this data. Some were of the view this should be the responsibility of LHBs rather than education settings. A couple of others assumed that this data would be collected by the education sector.

- The need for improved and integrated IT systems and processes across the education system and between the education system and LHBs in order to gather this data.

A smaller number of respondents also outlined some concerns about the additional administrative burden gathering this data may place on education settings – although others considered that gathering this data would be a relatively easy task.

Among the small number of respondents who disagreed or strongly disagreed with this proposal the only additional comments provided related to which body should be responsible for collecting this data, for example LHBs or the education sector.

Among respondents who noted that they neither agreed nor disagreed, the only comment offered was that it should be straightforward to gather this data.

Across written responses, some respondents highlighted potential challenges in the current connections between schools, local authorities and LHBs. Responsibility for collecting the data was also raised as an issue, with references to both education and health settings.

Focus group feedback

LA participants noted that:

- Most agreed that this data should be collected/recorded.
- One participant felt this was unnecessary, as data is already collected by LHBs and this should be their responsibility.
- It was suggested that alongside this data there is a need to align timeframes between education and health and develop a shared data management system.
- Clarity would be needed on whether data on advice and support provided by health bodies should be recorded on PLASC in addition to LHB-secured ALP.

Participants from schools noted:

- Very low numbers of LHB-secured ALP – several schools referred to challenges in accessing health-ALP because of LHB declining / unable to provide it.
- Many schools reported that gathering this data could strengthen accountability, potentially drive change and improvement and address some of the challenges encountered to date in engaging with health professionals in IDP meetings.
- Some schools feared that this would lead to increased bureaucracy and workload without corresponding support or system improvements.

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)?

Table 6: Responses to Question 6

Response category	Number of responses	Percentage of responses (%)
Strongly agree	35	38
Agree	26	28
Neither agree nor disagree	21	23
Disagree	6	6
Strongly disagree	5	5
Total	93	100

n= 93

Of those who completed the question, 66% (61 out of 93) either agreed or strongly agreed with this proposal, 23% neither agreed nor disagreed, and 9% disagreed or strongly disagreed.

43 respondents provided written comments in response to question 6.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- That this data was needed to identify potential gaps in the availability of Welsh-medium ALP (WM ALP). This included identifying potential gaps in the availability of Welsh language skills of workers who support the delivery of WM ALP as well as potential gaps in the availability of WM ALP in some specialist ALN units and specialist ALN provision (e.g. WM ALP for visually impaired learners).

Other themes raised by respondents who agreed with this proposal referred to:

- The need for the data to support the planning of provision – especially on a LA level. These respondents noted that this data is required to help identify the need for more WM ALP resources as well as Welsh language training for practitioners who support learners with ALN.
- Other points raised by those who agreed with this proposal included the need for the data to support equity in accessing bilingual provision and to monitor learner access to WM ALP.

However, a small minority of respondents who agreed with this proposal also questioned why it was required as, in their view, it should already be reflected in an individual learner's IDP. A similar small minority also noted that although they considered the data to be beneficial, they had some concerns about the potential

additional workload it may place on schools and the need for guidance relating to how this data should be collected.

Among the minority who strongly disagreed or disagreed with this proposal, the most frequently raised theme was that:

- The data was not needed because it was already recorded on individual IDPs and / or that the language of the provision was irrelevant as long as learners were getting the ALN support needed.
- A small number noted that gathering this data would be a waste of money or shift focus away from ALN support provision more generally.

Only two of the respondents who noted that they neither agreed nor disagreed with the proposal also offered additional comments. Among these it was noted that the data would be relatively easy to gather although there was some uncertainty about the purpose of gathering this data.

LA respondents and third sector organisations more frequently reported the need for this data to support with the planning of Welsh-medium provision compared with education workforce respondents and parents/carers. Education workforce respondents and parents/carers noted more frequently questioned whether the data was needed.

Focus group feedback

LA participants noted that:

- This data was important for some learners e.g. learners with ALN who come out of Welsh medium provision into EOTAS where there is now WM ALP.
- Others noted that they felt that gathering this data would be duplicating what is already being gathered in IDPs and within the Welsh in Education Strategic Plans (WESPs).

Participants from schools noted:

- Some school participants noted that while this information might be interesting, they questioned the need for it, noting that the language of the school-based ALP would reflect the language of the setting.
- Some noted that if the provision was not available in Welsh it would not be included in the IDP as a requirement – this also led to some uncertainty as to the need for the data.

Others were of the view that this data was probably more relevant to LA IDPs where some specialist provision e.g. speech and language support – may not be available in Welsh even though all other provision was available in Welsh

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)?

Table 7: Responses to Question 7

Response category	Number of responses	Percentage of responses (%)
Strongly agree	34	37
Agree	25	27
Neither agree nor disagree	22	24
Disagree	7	8
Strongly disagree	5	5
Total	93	101

n=93

Note: Percentages add up to 101% in this column due to rounding of decimal places.

Of those who completed the question, 63% (59 out of 93) either agreed or strongly agreed with this proposal, 24% neither agreed nor disagreed, and 13% disagreed or strongly disagreed.

32 respondents provided written comments in response to question 7.

Similar themes to those raised in response to question 6 were offered by those who strongly agreed or agreed with the proposal relating to question 7. That is:

- That the data was needed to identify potential gaps in provision, including resources and the Welsh language skills of ALN support practitioners
- The data is required to identify areas of need within specialist WM ALP.
- Another point frequently raised by these respondents was that this data is needed to identify differences in the requirement for WM ALP recorded on IDPs and the WM ALP that is being delivered.

The minority who strongly disagreed or disagreed with this proposal also noted similar themes to those relating to proposals outlined in question 6. That is:

- The data was not needed because it was already recorded on individual IDPs and / or that it is not relevant to ALN support.

Among those who neither agreed nor disagreed with the proposal and offered additional comments, the only themes raised were:

- That it would be relatively easy to gather this data (acknowledging that it would have to be collected separately on a school and LA level in many cases).
- It was also noted that it was unclear whether this data would duplicate data currently being gathered and recorded within the WESPs.

Focus group feedback

Participants from schools and LAs agree that WM ALP should be recorded in IDPs, but note practical challenges:

- There is no consistent MIS field to record whether ALP is required in Welsh, leading to reliance on commentary sections to record this.
- Concerns about added workload for Welsh-medium schools, which are already under pressure.
- A general comment offered by many focus group participants was that although they agreed that the data could be captured and may offer a Wales wide overview of the situation that data collection must also have a clear purpose and tangible benefits for schools and LAs.
- Participants highlighted that collecting this data would be valuable, as it could help identify and record instances where providing WM ALP was not possible within Welsh-medium settings.

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?

44 respondents offered written responses to this question.

A range of suggestions were offered by respondents relating to other information that could be gathered.

The most frequent suggestions related to the need to gather more data on the outcomes achieved by ALN learners as a result of the ALP they receive.

- It was suggested that data should not only capture who provides what support to learners but also captures how it is delivered, to what extent, and with what impact.
- A small number of respondents noted that in their view a lot of emphasis was placed on assessing the literacy outcomes of learners supported by ALP but that more data relating to other outcomes achieved by these learners should also be recorded.

Other suggestions offered by respondents did not necessarily relate to the need for more data but rather the need for more consistency in the way data is currently captured.

- These views related to both how data is recorded across schools and LAs as well as processes and systems in place to gather this data.
- Ensuring more data is captured in a consistent format across Wales would enable national level evaluations to take place and support increased accountability.

- Some of the respondents who noted the need for more consistency in relation to the data gathered about individual learners needs also noted that achieving this is complex as the needs of individual learners are often wide ranging and difficult to record quantitatively.

Suggestions were made that more data is required to outline the funding and resources that are available across LAs and individual setting to support the delivery of ALP.

Some respondents suggested that more data should be gathered in relation to timeliness.

- Suggested areas of data included the number of schools and LAs that are completing the ALN process and issuing an IDP within the statutory timescales.
- How quickly ALP is put in place.

Others noted that more data should be gathered on learners who receive additional support but are not registered as ALN.

- References here included those relating to early years learners who receive support even though they have not recognised at this stage as having ALN.
- References were also made to the need for data on learners without an IDP, but who still receive some form of additional support within school settings.

A small minority of respondents believed that no data should be gathered as it was not necessary. They argued that decisions about ALP should be made on an individual basis and informed by the views of parents and the professional judgement of ALN practitioners, rather than being linked to data.

Focus group feedback

LA participants noted that:

- Data relating to outcomes - more data should be gathered relating to the extent to which targets outlined in IDPs have been met.

Participants from schools noted that:

- Data relating to how schools define ALP within their setting would be beneficial.

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?

Table 8: Responses to Question 9

Response category	Number of responses	Percentage of responses (%)
Strongly agree	45	47
Agree	31	32
Neither agree nor disagree	14	15
Disagree	4	4
Strongly disagree	2	2
Total	96	100

n=96

Of those who completed the question, 79% (76 out of 96) either agreed or strongly agreed with this proposal, 15% neither agreed nor disagreed, and 6% disagreed or strongly disagreed.

54 respondents provided written comments in response to question 9.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- A need for clarity on the definition of “special class”. Respondents stressed that the term is ambiguous and requires clear criteria and guidance to avoid inconsistent interpretation across schools and LAs. They also highlighted that a learner may spend only part, or all, of their time in such classes, adding further complexity
- Collecting this data is valuable for monitoring inclusion and learner trends. Respondents said the data would help track reintegration, identify learners spending time outside mainstream, and provide insight into how inclusive the system really is.
- Useful to support planning and funding decisions with several respondents noting that the data could inform resource allocation, including where schools are funding provision themselves, and strengthen the case for additional support.
- Useful as evidence of capacity and demand pressures. Respondents noted that collecting this data could show gaps in specialist provision and show the scale of need currently managed within mainstream settings.
- Respondents believed that the data would help address funding challenges for schools providing special classes, explaining that schools often fund them from already stretched budgets, reducing resources for other interventions.

Among those who neither agreed nor disagreed, the most frequently raised points were:

- Uncertainty about what would count as a “special class” and respondents questioned the relevance and robustness of the data should definitions be open to interpretation.

Among the small minority who disagreed, the most frequently raised themes were:

- Respondents raised practical concerns, noting that collecting learner-level data is personal data and could stigmatise pupils.
- They highlighted difficulties in recording fluctuating attendance patterns.
- There were objections to the implementation of special classes with respondents arguing that learners with ALN should stay in mainstream wherever possible, with specialist placements only when formally agreed through IDPs in line with inclusive principles.

Comments for question 9 were often repeated in responses to the subsequent questions in this set (Q9–Q12) on special classes.

Focus group feedback

Focus group feedback reflected similar themes to the written responses. Participants from both LAs and schools noted:

- Concerns around the lack of a clear, consistent definition of what counts as a “special class,” with a warning that without this, and without clear national guidance, the data would be unreliable and open to misinterpretation.
- Concerns that collecting this data could be perceived as endorsing or encouraging schools to create special classes, which some felt conflicted with inclusion principles.

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?

Table 9: Responses to Question 10

Response category	Number of responses	Percentage of responses
Strongly agree	38	40
Agree	34	35
Neither agree nor disagree	15	16
Disagree	5	5
Strongly disagree	4	4
Total	96	100

n=96

Of those who completed the question 75% (72 out of 96) agreed or strongly agreed with the proposal, 16% neither agreed nor disagreed, and 9% disagreed or strongly disagreed.

48 respondents provided written comments in response to question 10.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- General support for this data as a way to build a clearer national picture of ALN provision and strengthen strategic planning.
- As with question 9, a need for clarity on the definition of “special class” with respondents emphasising that the term is ambiguous. Clear and nationally consistent criteria was requested to avoid inconsistent interpretations across schools and LAs.
- Respondents noted that the data could support planning and funding decisions and to better understand and allocate resources where schools are currently funding additional provision themselves.
- Evidence of capacity and demand pressures: several comments suggested that the data would reveal gaps in specialist provision and the scale of need currently managed within mainstream schools.
- Respondents noted that the data could provide insight into how inclusive mainstream settings are, track reintegration, and show how often learners spend time outside mainstream classes.

Among those who neither agreed nor disagreed, the most frequently raised theme was:

- Respondents questioned the definition and usefulness of “special class” data, noting confusion over what counts, differences between schools, and the risk of inconsistent results.
- Some felt collecting this data may not be relevant and stressed the need for clarity on how it will be used.

Among the small minority who disagreed, the most frequently raised themes were:

- Respondents warned the data might mask unmet need, showing only those in special classes while ignoring shortages, and as for the previous question stressed that specialist placements should remain exceptional and follow statutory IDP processes.

Focus group feedback

Focus group feedback reflected similar themes to the written response. Participants from both LAs and schools noted:

- Data is useful in principle, but seen as the most problematic to collect consistently due to day-to-day variability, pastoral events, and different delivery models. Many preferred broader categories (e.g., full-time/part-time or broad ranges/sessions) over exact hours to reduce burden and make it more likely to be consistently reported.
- The main issue noted was feasibility: time spent varies daily and over the course of the year, making accurate recording difficult and risking misleading snapshots.

- A further point raised was concern that time data could be misused as a measure of inclusivity rather than for planning, so clear guidance on data purpose and use is essential.

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)?

Table 10: Responses to Question 11

Response category	Number of responses	Percentage of responses (%)
Strongly agree	46	48
Agree	29	31
Neither agree nor disagree	15	16
Disagree	2	2
Strongly disagree	3	3
Total	95	100

n=95

Of those who completed the question, 79% of respondents (75 out of 95) agreed or strongly agreed with the proposal, 16% neither agreed nor disagreed, and 5% disagreed or strongly disagreed.

40 respondents provided written comments in response to question 11.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The respondents said that collecting data on school-designated special classes is important to understand the scale of need, map provision across Wales, and support planning.
- Clear and consistent definitions are essential, including what counts as a “special class,” to avoid confusion and ensure data is meaningful and useful.
- Comments highlighted significant capacity pressures, funding challenges and staffing issues, with many schools’ self-funding provision due to limited specialist placements.
- Respondents noted that any new data collection should avoid creating unnecessary administrative burden and be linked to existing systems.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- Respondents raised practical issues such as whether data would be collected at fixed points or as “live” data, and a suggestion that the data should be collected by LAs not schools.

- Suggestions for other potentially more useful data, including numbers on waiting list for specialist provision.

Among the small minority who disagreed or strongly disagreed, the most frequently raised themes were:

- Respondents questioned the clarity and value of collecting this data, suggesting existing mechanisms (e.g., Estyn reports) already show this.
- Respondents noted practical concerns about definitions.

Focus group feedback

Both LA and school participants noted that:

- The main concern was around definitions, and defining “school-designated” classes, as approaches vary widely. Without clarity, it was noted that the data would be unreliable.
- A further point raised was that Welsh-medium schools welcomed this data as evidence of unmet demand and a basis for better resource planning.

Some LA participants noted that:

- LA participants they had concerns that this could give schools implicit permission to create separate classes for learners they prefer not to keep in mainstream.

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)?

Table 11: Responses to Question 12

Response category	Number of responses	Percentage of responses (%)
Strongly agree	42	44
Agree	33	34
Neither agree nor disagree	15	16
Disagree	4	4
Strongly disagree	2	2
Total	96	100

n=96

Of those who completed the question, 78% (75 out of 96) agreed or strongly agreed with the proposal, 16% neither agreed nor disagreed, and 6% disagreed or strongly disagreed.

30 respondents provided written comments in response to question 12.

Among those who strongly agreed or agreed with the proposal the most frequently raised themes and main points were similar to earlier questions about special classes:

- Respondents reported that collecting this data would complement existing LA information and provide a complete national overview.
- Respondents believe this data would help Welsh Government understand demand, identify unmet need, and ensure fair access to provision across regions and language mediums.
- As with previous questions on special classes respondents emphasised the need for clear definitions and consistency in the use of terms and data collection criteria

Among those who neither agreed nor disagreed, comments included:

- As before, respondents raised practical issues such as whether data would be collected at fixed points or as “live” data, and a suggestion that the data should be collected by LAs not schools.

Among the small minority who disagreed or strongly disagreed, issues noted were:

- A concern about creating too many categories for data collection.
- A belief that the focus should remain on pupil outcomes rather than labels and noting the wide variation in what schools might designate as a “special” class.

Focus group feedback

Participants from both LAs and schools noted:

- A concern that the data / number of learners could be misleading without context, especially since models differ between schools and authorities. Participants called for ‘health warnings’ on data interpretation.
- Another point was that this data would help identify hidden demand and support decisions on funding and specialist provision, especially in Welsh-medium settings.
- A further point raised was the need for clear inclusion criteria (e.g., minimum time threshold) to avoid counting short-term interventions as special classes.

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)?

Table 12: Responses to Question 13

Response category	Number of responses	Percentage of responses (%)
Strongly agree	45	47
Agree	24	25
Neither agree nor disagree	20	21
Disagree	3	3
Strongly disagree	3	3
Total	95	99

n=95

Note: *Percentages add up to 99% in this column due to rounding of decimal places.

Of those who completed the question, 73% (69 out of 95) agreed or strongly agreed with the proposal, 21% neither agreed nor disagreed, and 6% disagreed or strongly disagreed.

45 respondents provided written comments in response to question 13.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- Respondents felt that this was useful and/or important data to collect. Respondents commented that, in their view, delays in decisions affected outcomes for learners and they considered that collecting this data could help highlight where and why delays occurred, including highlighting whether learners with specific characteristics (for example Welsh-speakers) were more affected than others by delays.
- Concerns that collecting additional data could add to the administrative burden for ALNCoS or comments noting that any changes should not add to ALNCoS workloads. Some respondents noted that the data may not be held by schools on the same systems used for submitting PLASC returns, and that this could therefore add to the administrative burden for these schools.
- That timescales for making decisions were challenging and that collecting this data could help to highlight the extent of this issue.
- That the reasons for delays should also be collected, to enable an understanding of where delays were happening in the system and why.
- Issues relating to accountability, with some noting concern that the data could be used as an accountability measure while others felt this could be a positive development or a potentially useful performance indicator. Respondents felt that schools not meeting timescales should be supported rather than criticised and some requested more detail on how this data would be used.
- Concerns about how the data would be collected consistently and/or validated to ensure accuracy.
- Practical considerations, such as whether the data would require schools and LAs to record the number of “No IDP” decisions separately.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- Questions about whether the data would be used for accountability purposes.
- Practical considerations, such as who would be responsible for collecting the information and how.

Among the small minority who disagreed, the most frequently raised themes were:

- Concerns about additional workload and timescales associated with decision-making processes.

LA respondents more frequently raised some points compared with education workforce respondents and parents/carers, specifically:

- That this data was important and/or useful to collect.
- Issues relating to the potential additional workload and accountability LA.
- Practical considerations about who would be responsible for collecting the data and how (this point was also raised more frequently by MIS suppliers than education workforce respondents and parents/carers).

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- They generally agreed that collecting this data was a good idea and could be useful for planning and understanding why timescales were not being met.
- That this information was already collected or recorded in some form.
- They had some concerns that the data could be used to hold settings and LAs to account.

Participants from schools noted that:

- They generally agreed with the proposal and felt it would highlight some of the challenges they faced in meeting the deadlines.
- They had some concerns that the data could potentially be used as a school accountability measure in future and emphasised that it should be used as a means to improve the system instead.
- They felt it was important to also collect information about the reasons why timescales were not met, for example, if schools were not provided with information they needed in time by external partners.
- They felt the data could be helpful in holding LAs to account.

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?

Table 13: Responses to Question 14

Response category	Number of responses	Percentage of responses (%)
Strongly agree	33	34
Agree	32	33
Neither agree nor disagree	24	25
Disagree	3	3
Strongly disagree	5	5
Total	97	100

n=97

Of those who completed the question, 67% (65 out of 97) agreed or strongly agreed with the proposal, 25% neither agreed nor disagreed, and 8% disagreed or strongly disagreed.

33 respondents provided written comments in response to question 14.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- That this was useful data that was important to collect because it would provide an indicator of whether the system was working as intended. Respondents considered that it could help identify variability in implementation between LAs and to target support appropriately to help improve the system.
- A few respondents emphasised that the data should be made publicly available, and commented on the importance of timely decision making, particularly in relation to supporting children in the early years.
- That the reasons for delays and exceptions should also be collected to inform system improvement. A few respondents felt more guidance, or standardised fields, should be provided relating to the exceptions that were valid, in order to ensure a consistent approach across LAs.
- Concerns were noted about the potential impact of additional administrative responsibilities on the workload of ALNCOs, which respondents felt was already significant.
- That meeting statutory timescales was challenging, and that the data would illustrate this by highlighting how often deadlines were not being met, potentially informing discussions about how realistic these expectations were.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- Concerns about the potential impact of additional administrative responsibilities on ALNCOs workloads.
- That timescales were challenging and sometimes not met.

Among the small minority who disagreed, the most frequently raised themes were:

- Concerns about the potential impact of additional administrative responsibilities on ALNCoS workloads.
- That the reasons for delays and exceptions should also be collected to inform system improvement.

LA respondents more frequently highlighted the need for more information or guidance relating to the exceptions that were valid, compared to other respondents.

Focus group feedback

Focus group feedback reflected similar themes to the written responses. Both school and local authority participants noted that:

- They generally agreed that collecting this data was a good idea.
- That it would be helpful to collect additional data on the reasons for exceptions because this could support planning and an understanding of why timescales were not being met.

LA participants noted that:

- In some LA areas, they were already collecting this data, and that they found it useful in identifying any services where additional capacity might be required to overcome any barriers to meeting timescales.
- That the data could be useful in identifying any trends in why exceptions were made and how these reasons were explained to parents.

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?

Table 14: Responses to Question 15

Response category	Number of responses	Percentage of responses (%)
Strongly agree	42	44
Agree	28	29
Neither agree nor disagree	16	17
Disagree	3	3
Strongly disagree	7	7
Total	96	100

n=96

Of those who completed the question 73% (70 out of 96) agreed or strongly agreed with the proposal, 17% neither agreed nor disagreed, and 10% disagreed or strongly disagreed.

34 respondents provided written comments in response to question 15.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- That it was important to collect this data as a measure of how many IDPs were being reviewed within timescales, and to understand how realistic the timeframes were. Meeting statutory timelines was noted to be challenging and collecting data would help show this.
- Respondents emphasised the importance of regular IDP reviews in ensuring that learners' needs were met and that they received appropriate support at the right time. Some respondents referred to the importance of timely reviews in ensuring continuity of support during transition stages including early years to primary, primary to secondary education and post 16 transitions.
- Concerns about the potential impact of additional administrative tasks on the workload of ALNCos and schools, for example if the data was not held on the same management information system schools used for PLASC returns.
- Practical considerations including questions about how and when this data would be collected, the potential need for separate collections for data on reviews of school-maintained and LA-maintained IDPs and questions about whether collecting individual-level data would be preferable to aggregate-level data.
- Respondents proposed collecting data on the reasons statutory timeframes could not be met to see if there were consistent difficulties that could be addressed.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- A call for more clarity on how and when this data would be collected and how the data would be used.
- The need for consistency in data collection, for example by ensuring clear definitions and guidance was available.
- The importance of using the data to support schools, rather than holding them to account.

Among the small minority who disagreed, the most frequently raised themes were:

- Broader concerns about the workload associated with carrying out reviews for learners with ALN, with a few respondents referring to schools carrying out reviews for learners with more complex needs and for those with LA-maintained IDPs (with LAs providing quality assurance of these).
- That the information could be gathered through means other than PLASC, such as LA quality assurance processes, school improvement partners, school self-evaluation processes or school inspections.
- That other data should be collected, such as data on the number of 'discontinued' IDPs following reviews, or data on how frequently reviews were taking place (for example, in cases where reviews were more frequent than annual).

Compared with other respondents, LA respondents placed greater emphasis on the importance of collecting this data to monitor the timeliness of IDP reviews and raised concerns about the potential impact on practitioner workload.

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- They generally agreed that collecting this data was a good idea and that the proposal aligned with the ALN Code.
- That collecting this information could help incentivise schools to complete reviews within the statutory timeframes.
- That there could be an additional administrative burden for schools if the systems used for completing PLASC returns were different to those used for recording this information.

Participants from schools noted that:

- They generally agreed with the proposal but had some concerns about the data being used as a school accountability measure.
- They felt the data would highlight the challenging timescales and workload of ALNCos.
- They would be interested in seeing the variations in data across schools and LAs and comparisons in relation to school-maintained and LA-maintained IDPs.

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?

Table 15: Responses to Question 16

Response category	Number of responses	Percentage of responses
Strongly agree	57	58
Agree	26	26
Neither agree nor disagree	13	13
Disagree	2	2
Strongly disagree	1	1
Total	98	100

n=99

Of those who completed the question 84% (83 out of 99) agreed or strongly agreed with the proposal, 13% neither agreed nor disagreed, and 3% disagreed or strongly disagreed.

42 respondents provided written comments in response to question 16.

Among those who strongly agreed or agreed with the proposal, the most frequently raised themes were:

- The data would help improve understanding of the role of the ALNCo. For example, it was recognised that the data will:
 - offer a more accurate picture of the role of the ALNCo.
 - illustrate inconsistencies in ALNCo roles and responsibilities across Wales.
- Importance of clear definitions of the senior leadership team roles and a recognition that this can vary depending on school structure.
- Respondents supported collecting this data as they think all ALNCos should be included in senior leadership teams.
- Concerns that collecting this data could have an impact on workloads.
- Data relating to the qualifications held by ALNCos should be also collected.

Among those who neither agreed nor disagreed, the most frequently raised themes were:

- Collecting data related to how an ALNCo's time is spent is more relevant than whether they are on the senior leadership team.

Among those who disagreed with the proposal, the most frequently raised themes were:

- Concerns that ALNCos should not be required to be on the senior leadership team.
- Questioning the purpose of collecting this data.

LA respondents more frequently reported that this data should be collected on the basis that ALNCos should be a part of the senior leadership team, compared with other respondents.

Focus group feedback

Focus group feedback reflected similar themes to the written responses.

LA participants noted that:

- They generally agreed that this was needed but had some concerns regarding the financial implications and noted that the data would need to be placed within context (e.g. school size).
- They suggested that it may be useful to collect further data on ALNCos such as non-contact time, teaching time, and qualifications.

Participants from schools noted that:

- They generally agreed that this data should be collected and indicated that ALNCo working arrangements varied considerably between schools, with several providing examples based on their own knowledge of arrangements across their school clusters.
- They expressed concern about possible additional expectations and an increased workload if ALNCos were required to be on the senior leadership team.

Workforce implications

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

73 respondents provided written comments in response to question 17.

The most frequent points raised were:

- Several respondents referred to the anticipated long-term positive effects. Some noted here that the knowledge gleaned from the data could potentially improve the current workload, reduce the time spent on administrative tasks, and reveal the need for further support in the role.
- Several respondents expressed concern that the proposed changes would have a negative impact on the workload of the ALNCo. Many concurrently noted that this would be particularly impactful because of views that the ALNCo's workload is already unsustainable.
- Others noted that changes would require adapting the role and responsibilities of the ALNCo, such as placing the ALNCo within the senior leadership team or providing an assistant ALNCo role to deal with the administration of data collection. Some noted that any changes would include an implication for staff training.
- Many noted that the proposed changes necessitated the development of a digital tool to effectively collect the data, one that works in tandem with schools' information management system, to ensure consistency in collection and to avoid increasing the workload.
- Few noted that the data could illustrate the deficiency in Welsh language capacity and therefore effect an increase in the resources made available to them.

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?

58 respondents provided written comments in response to question 18.

The most frequent points raised by respondents were:

- Respondents suggested additional data items, such as:
 - qualitative feedback from learners and families on their experience of the provision.
 - post-16 outcomes for learners who receive ALP.
 - the level of ALN compared to the provision available, such as in mainstream schools, special schools, or home education.
 - the number of reconsiderations in LAs and schools.
 - the number of tribunals occurring annually.
 - further data on ALNCoS, such as how an ALNCo's time is spent, whether there are any staff in post that support the ALNCo role and ALNCo retention rates.
 - further data on the exact way allocated funding is used per learner and how the budget is used in schools.
 - further data on IDPs, such as the exact timeline of developing an IDP and how many learners currently have draft IDPs.
 - further data on learners who require extra help and are being supported, but who do not have an IDP.
- Some expressed concern at how the data would be interpreted, and that the data should not be used to grade schools comparatively.

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.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

82 respondents provided written comments in response to question 19.

The most frequent themes raised were:

- Several respondents referred to positive impacts which they anticipated the changes would have. These respondents believed that language preferences should be accommodated and so welcomed the proposed data changes. In addition, these respondents also expressed how they felt the changes would lead to improvements in the quality of the data being collected which could then be utilised to better support learners with ALN in the system.

- A number of participants highlighted how the changes may lead to increased visibility of the Welsh language, particularly regarding challenges facing Welsh language provision. They noted that this could lead to better awareness and support planning within the system.
- Several respondents reported that they did not anticipate any effects on the Welsh language from the proposed changes. Some of these participants noted they were in predominantly English-speaking areas and so were not expecting there to be any impact on promoting the Welsh language.
- There was a perception in a minority of responses that the changes could present a disproportionate burden as Welsh language-specific data would not be relevant to many settings.
- Others noted they did not feel there would be any adverse effects on the Welsh language due to the changes.

Respondents from the education workforce more frequently noted they felt the changes would have a positive impact and lead to better quality data being collected.

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.**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

77 respondents provided written comments in response to question 20.

The most frequent points raised by respondents were:

- Several respondents noted that they did not feel any additional changes to the proposed new data were necessary. These respondents highlighted that the proposed changes ought to contribute to standardisation and equity of support across both languages and therefore did not have any suggestions for amendments.
- A small number of respondents highlighted how the data, once collected, should be used to compare whether there are any differences between the languages, particularly any potential negative effects on Welsh being treated less favourably than English.
- A minority of responses expressed concerns that the changes may lead to tokenistic reporting which does not reflect practice on the ground.
- Several respondents reported they were unsure whether additional changes to the proposals were needed and highlighted how they had no strong opinions on the proposals regarding Welsh language. This was noted to be because some of these respondents worked through the medium of English, rather than Welsh, and so they did not anticipate any direct changes to their own role/provision.

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:

40 respondents provided further comments in response to question 21.

The most frequent themes raised by respondents were:

- Several respondents provided suggestions on additional data which they felt ought to be collected. This included the following:
 - number of learners who are given extra support which is not deemed to be ALP
 - access to specialist provision (waiting times and impact on learners)
 - ALNCo workload
 - number of ALN support staff (such as admin officers) who support ALNCos
- Several respondents expressed concerns about the changes to data collection and impact on staff workload, particularly the ALNCo role (such as extra admin for little perceived benefit).

Focus group feedback

LA participants noted:

- Suggestions for additional data which they felt ought to be collected. This included the following:
 - number of learners with healthcare plans to help highlight the complexity of healthcare needs in schools
 - secondary transition data for children transitioning from mainstream into specialist LA provision
 - ALNCo non-teaching/non-contact time to better understand the impact of the role
 - whether ALNCos are part of SLT
 - whether ALN is included in individual School Improvement Plans as a priority area
 - whether statutory timescales are being met
- Changes to data fields could present challenges with MIS. Respondents noted that long-lead in times were often needed to liaise with external software providers and that this should be reflected in the timescales of any data changes.
- Different MIS systems are in place across LAs and schools, and there are existing challenges with integrating data capture across the systems. Concerns were raised that additional fields may lead to a duplication of work which needs to be taken into consideration.
- The potential for a centralised national IT system should be explored to overcome variation in existing data collection and streamline processes.
- Requests were made for clear guidance once data changes are confirmed. This included clarity over terminology and definitions to ensure consistency with data collection.

- Any data changes or additional data collection should be used to inform improvements to the system to make it worthwhile, with the rationale for changes being clearly communicated.

Participants from schools noted that:

- Clarity is needed regarding MIS and how additional data will be collected and reported to explore the feasibility of meeting new any data requirements.
- Training would be needed on new data collection methods or systems to ensure consistency across settings.
- Any data changes should also include monitoring the number of learners who have a health diagnosis but do not have an IDP so that potential gaps in provision can be better understood.

Annex A: List of respondents

Only respondents who agreed to be named are included in this annex. A total of 69 respondents requested anonymity therefore this is not a complete list of all respondents, and all personal data has been removed.

Bromcom
Caerphilly LA
Cardiff LA
Carmarthenshire County Council
Ceredigion LA
DECLOs
Denbighshire County Council
Department for Education (DfE)
Estyn
Gwynedd LA
Hywel Dda University Health Board
Independent School in South Wales
Learning Disability Wales
Medr
Monmouthshire LA
Mudiad Meithrin
NAHT Cymru
NASUWT
NEU Cymru
Newport LA
[Name] Primary School
RNIB Cymru
Royal College of Psychiatrists Wales (RCPsych Wales)
Swansea LA
[Area] specialist teacher
UCAC
Unison
UKABIF
Welsh Language Commissioner