

Agenda – Children, Young People, and Education Committee

Meeting Venue:	For further information contact:
Hybrid – Committee room 2 Senedd and video conference via Zoom	Naomi Stocks
Meeting date: 6 November 2025	Committee Clerk
Meeting time: 09.30	0300 200 6565
	SeneddChildren@senedd.wales

Hybrid

Private pre-meeting

09.15 – 09.30

Public meeting

09.30 – 11.30

1 Introductions, apologies, substitutions and declarations of interest

09.30

2 School improvement and learner attainment – evidence session

09.30 – 11.30

(Pages 1 – 100)

Lynne Neagle MS, Cabinet Secretary for Education

Georgina Haarhoff, Director of Education, Welsh Government

Nic Edwards, Deputy Director, Equity in Education Division, Welsh Government

Alun Jones, Head of Education Improvement Team, Welsh Government

Sarah Angel, Head of School and Learner Information Policy, Welsh Government



Attached Documents:

Research brief

Stakeholder event note

Evidence Paper – Welsh Government

3 Papers to note

11.30

3.1 Implementation of education reforms

(Pages 101 – 103)

Attached Documents:

Letter to the Chief Executive of Qualifications Wales from the Chair of the Children, Young People and Education Committee

3.2 Implementation of education reforms

(Pages 104 – 106)

Attached Documents:

Letter to the Chief Executive of the WJEC from the Chair of the Children, Young People and Education Committee

3.3 Implementation of education reforms

(Pages 107 – 109)

Attached Documents:

Letter to the Chief Executive of Qualifications Wales from the Chair of the Children, Young People and Education Committee

3.4 Services for care experienced children: exploring radical reform

(Pages 110 – 111)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee and the Chair of the Petitions Committee from NYAS Cymru

3.5 P-06-1518 Provide more timely and accessible mental health support for children under 10, including by referral to Child and Adolescent Mental Health Services (CAMHS)

(Pages 112 – 113)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee and the Chair of the Health and Social Care Committee from the Chair of the Petitions Committee

3.6 Health and social care workforce

(Pages 114 – 115)

Attached Documents:

Letter to the Chief Executive of Swansea Bay University Health Board and the Chief Executive of HEIW from the Chair of the Health and Social Care Committee

3.7 Routes into post-16 education and training

(Pages 116 – 117)

Attached Documents:

Letter to the Cabinet Secretary for Transport and North Wales from the Chair of the Children, Young People and Education Committee

3.8 Welsh Government Draft Budget 2026–27

(Pages 118 – 119)

Attached Documents:

Letter to the Cabinet Secretary for Health and Social Care from the Chair of the Children, Young People and Education Committee

3.9 Information from Stakeholders

(Page 120)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Office for National Statistics

3.10 Inter-ministerial Group on UK–EU Relations

(Page 121)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee from the Cabinet Secretary for Education

3.11 Legislative Consent: Children’s Wellbeing and Schools Bill

(Pages 122 – 125)

Attached Documents:

Welsh Government’s response to the Children, Young People and Education Committee report on the Legislative Consent Memoranda of the Children’s Wellbeing and Schools Bill

3.12 Legislative Consent: Children's Wellbeing and Schools Bill

(Pages 126 – 131)

Attached Documents:

Welsh Government's response to the Legislation, Justice and Constitution Committee report on the Legislative Consent Memoranda of the Children's Wellbeing and Schools Bill

4 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of this meeting

11.30

Private meeting

11.30 – 12.00

5 School improvement and learner attainment – consideration of the evidence

11.30 – 12.00

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Welsh Government Evidence Paper – Children, Young People and Education Committee

School improvement and learner attainment

Introduction

The Welsh Government is committed to improving attainment and raising educational standards. For children to thrive and reach their full potential, they must be in school, actively engaged in their learning and the broader opportunities available to them.

The Cabinet Secretary for Education's priorities are clear: improving attendance and raising attainment in literacy and numeracy, supported by ongoing reforms to the curriculum and Additional Learning Needs (ALN). At the heart of these efforts is a commitment to promoting well-being across schools, which underpins the success of all reforms.

These national priorities represent our national mission and are intended to unify the sector's efforts around delivering meaningful improvements for young people.

This paper sets out the following:

- The future direction of school improvement arrangements detailing our approach adopted as part of the School Improvement Partnership Programme (SIPP).
- Our collaborative work with local authorities and partners to deliver the highest standards of education across Wales and our progress to date.
- What current evidence tells us about learner outcomes and educational standards.
- Key factors affecting learning and progression.
- The actions underway - and those still needed -to overcome barriers, support learners to reach their potential, and raise standards across schools and the wider education system.

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1. School improvement arrangements

The future direction of school improvement arrangements and our approach to the School Improvement Partnership Programme (SIPP) including oversight and governance

1.1 Background – the review

A review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements was a commitment in our national mission – High Standards and Aspirations for All. The Review of the Roles and Responsibilities of Education Partners in Wales and School Improvement arrangements was commissioned in July 2023, led by Professor Dylan Jones (UWTSD), supported by ISOS Partnership¹.

In December 2023 the review team updated the then Minister on their progress and the key emerging themes and findings, which highlighted consistent messages from school leaders and clear views from the majority of local authority partners. The feedback was clear on the preferred direction of travel:

- an opportunity to lead on school improvement matters more locally through a greater focus on local school collaboration and partnership working between school leaders and their Local Authority;
- partnerships between more than one LA with a move away from a wider regional model of support;
- stronger national leadership with clearer national priorities for schools.

The outcomes of the review, in conjunction with international evidence and practice suggested strongly that effective and purposeful collaborative working between schools should form an integral part of the school improvement arrangements. It was also clear that collaborative work at all levels of the system, and between all partners, would be critical to ensuring system-wide educational improvements for the benefit of all learners.

Following this the Minister agreed that the next stage of the review's work would focus on the detailed design and co-construction of revised school improvement

¹ Welsh Government (2023), *Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements: terms of reference*.

arrangements. This approach was agreed by Cabinet on 15 January 2024 and announced in a Written Statement on 31 January 2024.^{2 3}

1.2 Implementing the review's findings

The SIPP was established within Welsh Government to drive forward the review's findings. The policy framework for the programme (set out in the above Written Statement – 31 January 2024) highlights the following aspirations:

- deliver improved educational standards in the context of clear roles and responsibilities across the education system;
- target resources in the most appropriate, efficient and effective ways, prioritising funding to schools and improving impact and delivery within the constrained budgets we are working with;
- reduce workload at school level through implementation of a shared national improvement framework and simplified, streamlined reporting;
- deliver more effective local collaboration, between schools and between local authorities, with an expectation that all schools and local authorities will work in partnership. It will provide greater consistency of support and empowerment, with school improvement at the heart of realising our education reforms; and,
- build more education expertise and implementation capacity nationally to provide stronger national leadership and clear frameworks to deliver our priorities.

The Written Statement also confirmed 3 workstreams for refining our school improvement arrangements:

1. Supporting school-to-school working at a local level
2. Supporting school-to-school collaboration and networking across local authorities and at national level
3. Supporting school improvement at national level.

The reflections of the review were clear in calling for stronger national direction and leadership and fewer national priorities as well as highlighting important

² Welsh Government (31 January 2024), *Written Statement: The next stage in the review of school improvement - the roles and responsibilities of education partners in Wales*

³ Welsh Government (31 January 2024), *Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements: letter to the Minister.*

areas for Welsh Government to focus national action (such as addressing issues with the professional learning offer and supporting our reform agenda).

The Welsh Government is committed to providing national leadership for the education system in Wales; playing a key role in leading a self-improving education system. The Welsh Government plays a pivotal part in ensuring a shared understanding of priorities and leading strategic discourse and solution creation. Collaborative improvement at all levels of the system, including the national level, will lead to greater national coherence and focus and ultimately provide a better foundation for raising educational standards.

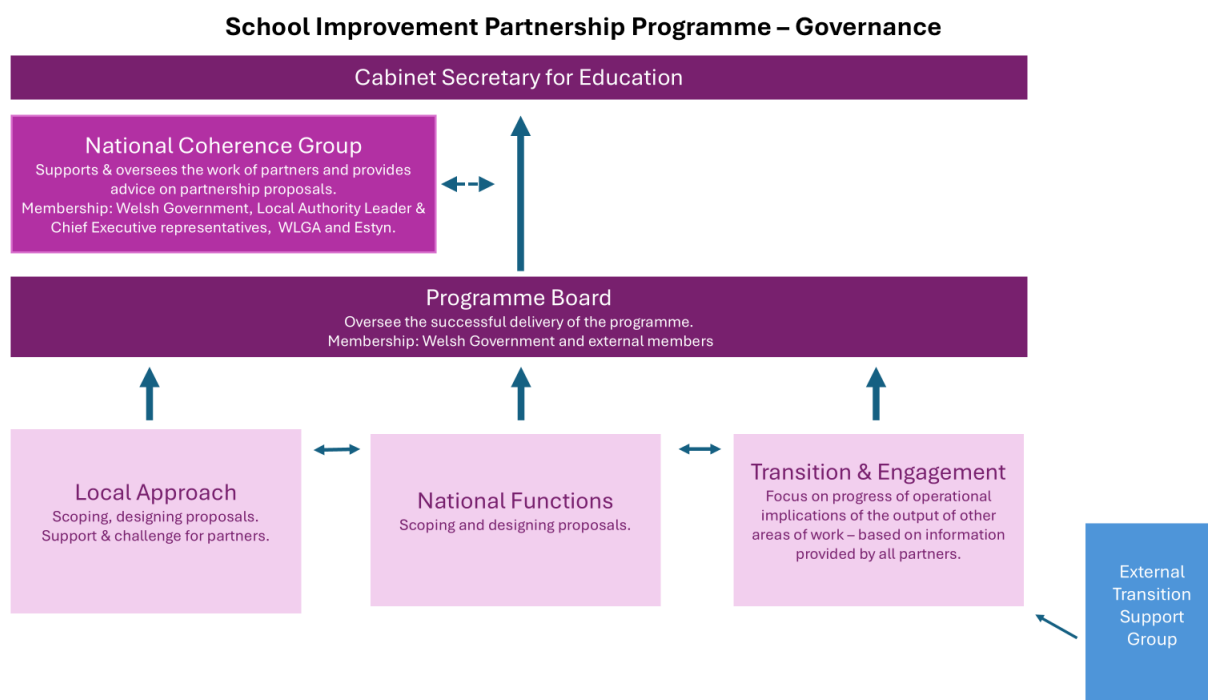
Throughout the programme, Welsh Government has remained committed to local authority ownership of the school improvement changes within an agreed national framework – ensuring clear accountability to fulfil their statutory functions.

To support clarity and focus throughout the system, Welsh Government published a simple and high-level National Improvement Framework⁴ in December 2024. This clarifies our overarching system goal, outlines three key areas for self-evaluation and improvement and is aligned with the Estyn Common Inspection Framework. This demonstrates our commitment to working with our partners to provide a clear and consistent operating framework for schools.

1.3 Oversight, governance and scrutiny of the programme

Supporting the governance of the programme, a range of programme governance boards and a National Coherence Group (NCG) was established. As outlined below:

⁴ Welsh Government (December 2024), Hwb, *National Improvement Framework*.



A full programme management resource was established to oversee the work of the programme.

Welsh Government established an internal delivery board comprised of senior staff from across the education directorate supported by external challenge to oversee the development and design of national functions and overall progress. Further to this was the strategic programme board with external stakeholders drawn from across the education sector (with representation from ADEW, WLGA, Regions, Workforce Unions, Estyn and Welsh Government) working together at the heart of the programme steering the direction.

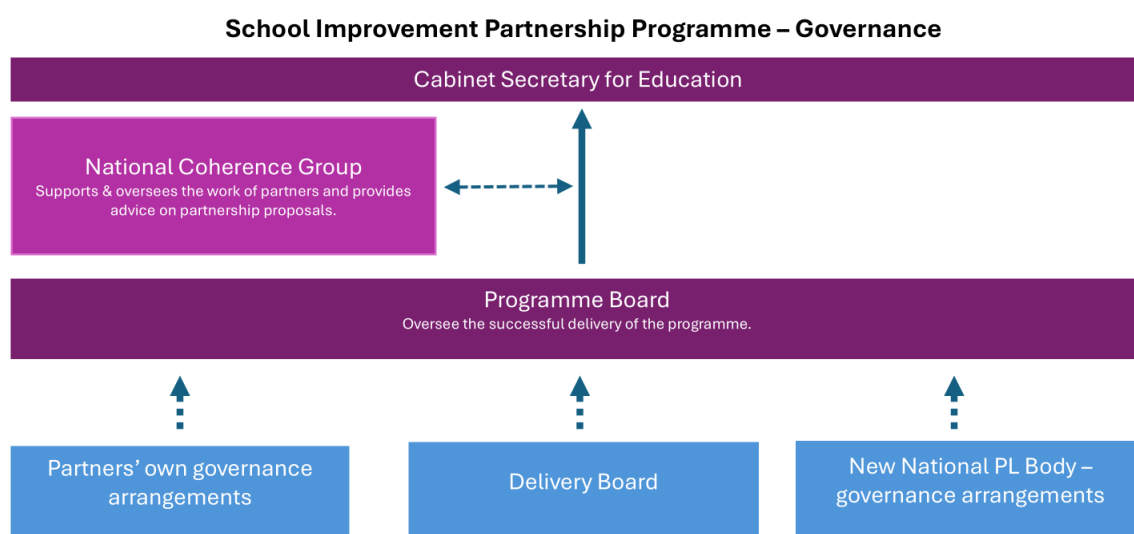
The final element of governance for the programme is the National Coherence Group. The NCG was established in recognition that the SIPP programme was operating across a range of different layers in the system, and there was a need for advice to the Cabinet Secretary for Education on whether the range of changes were coherent at national level. The NCG is chaired by Kirsty Williams CBE and has representation from across the system. The NCG does not have a decision-making role or a role in relation to the individual organisational changes; responsibility remains with the organisations themselves.

At the end of 2024 the NCG met to consider overall system coherence. Following its considerations, Kirsty Williams CBE wrote to the Cabinet Secretary for Education with the observations and reflections of the group, detailing the NCG

support for the principles of the proposed approach and their agreement with the intention to clarify and simplify the school improvement system in Wales.^{5 6}

The National Coherence group will next meet on 3rd November 2025.

Reflecting the evolving and dynamic nature of the SIPP, governance and support arrangements have been kept under regular review. Reflecting the progress of the programme and the current focus of our work, current arrangements are set out below:



⁵ Welsh Government (29 January 2025), *Written Statement: School Improvement Partnership Programme – Progress Update*

⁶ Welsh Government (29 January 2025), *National Coherence Group: letter to Cabinet Secretary*

2. Working with Local Authorities and partners

Our collaborative work with local authorities and partners to deliver the highest standards of education across Wales and our progress to date.

2.1 Building the case for change

Welsh Government set out its vision in transitional guidance (see Document 1) which was co-produced with local authorities in early 2024 and shared formally with LAs and key stakeholders (Estyn and Teaching Unions) in October 2024.

The guidance sets out the overall vision of the programme, to ‘ensure that all learners in Wales reach their full potential within an education system which values their unique contribution along their 3-16 journey and beyond.’

As many school improvement challenges are shared and too complex to solve one school at a time, the guidance sets out the role of purposeful collaboration in overcoming barriers to learning and improving progress and outcomes for all learners. The programme recognises the recommendations of the review that schools should lead improvement, as they are most expert in the challenges they face and approaches to overcoming these. The aim of the new approach is to build a more formal collaborative model to enable this expertise to be shared in a constructive, open and trusted environment, in line with the work of schools as learning organisations.⁷

The guidance sets out the expectation of local improvement communities of schools in every part of Wales where school leaders and school staff:

- have agency over their own development, working in partnership with other colleagues, schools and the LA, whilst contributing to a shared local and national improvement agenda;
- belong, and contribute to an open, inclusive and supportive environment that supports and enables the improvement of all schools, focused on continuous improvement in educational outcomes for our young people; and
- have a shared moral purpose for the progress of all learners within a local area.

Effective collaborative working between schools can enhance the quality of self-evaluation and improvement planning by enabling wider perspectives, expertise

⁷ Welsh Government, Hwb, *Schools as learning organisations*

and capacity to be shared. This is fundamental in ensuring that no schools or learners are left behind.

2.2 Model and principles that underpin the new school improvement arrangements

The following five principles underpin the new school improvement arrangements and will be set out in the new School Improvement Guidance:

- **A culture of collective responsibility to raise standards for all learners**

Improvement is a shared endeavour. While schools remain accountable for their own learners, they should also support progress across the wider education system, working together with other schools and their LA to promote high expectations and equity.

- **Purposeful external perspectives within an open, inclusive learning culture**

Schools should welcome peer collaboration and external challenge to improve learning. Trusted external input strengthens self-evaluation, professional learning, and openness across the system.

- **Focus on activity that improves learning – ensuring long-term collective solutions to address local challenges**

Sustainable improvement comes from long-term collaboration. Schools and LAs work together to tackle barriers early and develop shared solutions tailored to local needs.

- **Capacity for improvement being built within the school system**

Expertise is developed and shared across sectors - primary, secondary, special schools, PRUs, and LAs - to build a resilient, inclusive education system that meets diverse learner needs.

- **Clarity and coherence across partners under national leadership**

All partners understand their roles. Welsh Government and national bodies set clear expectations and support improvement and professional learning, while schools and LAs align local efforts with national priorities.

The guidance also sets out the following school improvement model to provide clarity on roles and responsibilities (this builds upon the model outlined in the transitional guidance – Document 1):

- Schools should lead their own self-evaluation and improvement planning process in an open, iterative way (rather than as a one-off event) in line with developing a culture of continuous learning. This process should be supported by external perspectives, provided by other schools in partnership with the LA.
- Schools should be part of a vertical collaborative model (3-16), and a horizontal collaborative improvement model (e.g. secondary to secondary or special to special). These collaborative relationships should provide the additional capacity, specialism and expertise to support the improvement journey of all schools in a sustainable way.
- Schools will use their school development plan (SDP) to capture the school's ongoing strategic plan for improvement including identification of priorities and relevant professional learning. Schools will also plan improvement across their collaborative partnerships, collectively striving to tackle common issues.
- LAs should use the collaborative improvement model to gain an authentic understanding of local improvement needs, understand their schools' capacity for improvement, broker bespoke support when required and build a resilient and sustainable learning system.
- LAs should work in partnership with each other to refine their self-evaluation processes, share improvement priorities and share school-based capacity in a systemic way. They should use information and intelligence from their work with schools and other LAs to support their own strategic improvement planning processes.
- The Welsh Government will provide consistent professional learning for national priority areas through the establishment of a new professional learning and leadership body. This will deliver nationally consistent support to enhance system improvement. A new Education Improvement Team has been established within Welsh Government to connect local needs with national priorities.

2.3 What has been achieved to date?

As of Autumn 2025, the following actions have been completed across the three workstreams:

Supporting school-to-school working at a local level

Welsh Government has:

- Set out a nationally consistent set of policy objectives and a national school improvement model within transitional guidance to LAs (as set out in 2.1 above) to provide a framework for design of local arrangements.
- Discussed with LAs their high-level plans setting out how their proposed model for delivering school improvement locally meets national expectations.
- Produced a system maturity matrix for local authorities to illustrate a common pathway to improvement – building the collaborative culture and giving system confidence and clarity. This supporting material was designed to encourage discussion between LAs and their school leaders, and to support local thinking and planning.
- Established a new Education Improvement Team (EIT) within Welsh Government. The EIT, supported by the external review team, held workshops with all LAs, with Directors of Education, their team leads and their headteacher representatives. These workshops:
 - helped to clarify national expectations of a local system including the rationale and benefits of collaborative school improvement;
 - enabled Directors of Education to set out their plans to integrate the school improvement function within their current inclusion offer /wider services to create a holistic, integrated local system;
 - enabled headteachers and the LA to have an open conversation around developing a new collaborative school improvement system. This supported the development of a strong moral case for collective responsibility for all learners within a local area; and
 - Provided the foundation for an open and trusting relationship between schools, their LA and WG.
- Transferred ownership of all the funding levers to Local authorities for school support at local level. Funded programmes for national support on both professional learning and leadership are allocated to Dysgu.

Supporting school-to-school collaboration and networking across local authorities and at national level

- Local authorities and schools have worked together to devise arrangements which fit their needs, in the context of the national framework, specifically, to build relationships and consider opportunities and approaches for collaboration and support.
- All local authorities are completing the transition to new or evolved partnership arrangements which are designed by them to support the needs of their authority and its schools. Welsh Government has provided transitional funding to support this structural change, and ongoing support for literacy and numeracy capacity at local level. Partnership models between LAs across Wales differ according to local needs but all

local authorities are working with/building relationships with others to ensure information sharing across boundaries.

- The EIT has brought together local authority inclusion and improvement officers to facilitate the sharing of learning and intelligence with a view to building a more consistent and agile system across Wales. This will be an ongoing forum to build capacity in the system at LA/government level.

Supporting school improvement at national level.

- In November 2024 the Cabinet Secretary for Education set out sector wide improvement priorities to provide a clear focus and underpin the improvements we want to see⁸. The national priorities are clear: improvements in attendance and in learner attainment in literacy and numeracy underpinned by the continued implementation of reforms to the curriculum and to ALN. At the heart of these efforts is a commitment to promoting well-being across schools, which underpins the success of all reforms. This clear set of priorities is intended to help manage workload, prioritise resources and focus the collective efforts of the sector on enabling real improvements for young people. The Oral Statement was followed by a direct letter from the CSE to every school in Wales outlining her priorities.
- The Welsh Government has established an Education Improvement Team (EIT) led by a permanent Head of team with a background in the education sector and staffed by seconded capacity from local authorities, Estyn and schools. The team will work closely with LAs and schools to consider national priorities, understand these at local level, and learn about emerging local priorities. The EIT has developed a shared national improvement framework and pattern of engagement to build information sharing and support across Wales. It will also work closely with Dysgu.
- Dysgu - the national professional learning and leadership body - has been established to bring together national professional learning and leadership programmes, with a focus on building close relationships with local authorities, direct delivery capacity and capability, and a commitment to work hand in hand with Welsh Government on Ministerial policy priorities. Dysgu came into being on 1 September 2025, with its first year of operations being a year of transitional working with the Welsh Government.
- Welsh Government has established strategic national support programmes providing intense, targeted support designed to address our most critical system issues and support consistent implementation of our

⁸ Welsh Government (5 November 2024), *Oral Statement: Improving educational standards in Wales*

education reforms. The first such programme is targeted at support for the curriculum, specifically literacy and numeracy. These programmes are being transferred to Dysgu as our national professional learning body, who will work closely with Adnodd on these issues.

The Welsh Government and the Association of Directors of Education in Wales (ADEW) are working together to develop a more planned approach to engagement on key policy areas, to ensure we co-develop policy, work together on emerging issues and challenges.

In May 2025, Professor Dylan Jones wrote to the Cabinet Secretary for Education to mark the end of the review team's engagement in this work.⁹

2.4 New arrangements compared to previous consortia arrangements

Local authorities have always held the statutory responsibility for delivering education services. However, since the introduction of the national model for regional working and the establishment of the regional consortia (2015) many LAs have delivered services to schools through these bodies. The regional consortia were legally governed by local authorities, although much of their wider operations were funded by direct grants from the Welsh Government.

There was a high degree of variation between regional set ups and operations with each region providing a range of different approaches to curriculum support, professional learning and school improvement along with the variations in their constitution.

Since 2020, with the withdrawal of LAs from the previous ERW regional consortia arrangement (resulting in ERW's dissolution in 2022), even further degrees of variation have existed across the system.

Welsh Government set out key expectations for the system in the transitional guidance issued to LAs in October 2024 (as set out in 2.1 above).

Local authorities have always held the statutory responsibility for school standards and improvement, and no change has been made to these arrangements. The process we have been through has, however, allowed LAs to take a fresh look at how they support their schools and make decisions about the

⁹ Welsh Government (June 2025), *Review of roles and responsibilities of education partners in Wales and delivery of school improvement arrangements: update letter to the Cabinet Secretary for spring 2025*

nature of their future support arrangements, within the context of the guidance set by Welsh Government.

Almost all local authorities have taken this opportunity to re-integrate school improvement into the operation of their LAs – ensuring a holistic support offer to schools across inclusion and curriculum.

All LAs have moved forward with changes to their systems based on the guidance and aligned SI arrangements to the principles and objectives we have established. While there are a range of approaches reflected in individual LA plans this does not detract from the progress toward the overall aims, objectives and ultimate direction of the programme.

Arrangements in each of the previous regions

All LAs have revisited the requirements of their previous arrangements (reflecting in part the changes that the development of Dysgu has driven). They have determined their priorities for support to their schools and some have kept the shape of previous partnership arrangements. This approach reflects the strong ethos of partnership working in support of schools that is a key feature of the Welsh system.

Below is a summary of information provided by LAs/lead LAs in recent transition returns made to Welsh Government. This is, however, a summary only and provided to support the Committee's understanding of the changes across the system.

Partneriaeth (Carmarthen, Pembrokeshire and Swansea)

Following the dissolution of ERW the 3 LAs formed a partnership to support schools with professional learning and curriculum support. All LAs chose at that point to reintegrate SI support at LA level. LAs have recently taken the opportunity to revisit their governance arrangements and re-focus services (with the advent of Dysgu) but are continuing to work in partnership and delivering PL support via Partneriaeth.

GWE (North Wales)

The regional consortia ceased operations in May 2025. The North Wales region decided to move away from the previous arrangements entirely with the reintegration of SI support back to LAs with a range of staff subsequently transferring into LAs. There is a strong ADEW partnership across the region which continues to enable the LAs to operate collectively where that brings benefits. For example, a lead LA is being utilised to continue to ensure ongoing support for specific PL needs on behalf of the region. Alongside this there is

strong partnership working between specific LAs in the area, including sharing staff and providing support to schools.

Central South Consortium

All the LAs in this region have chosen to reintegrate SI support back into the LA with a range of staff subsequently transferring into LAs from the regional consortia. All LAs are continuing to operate collectively in terms of local professional learning support to schools via a regional partnership. The services have been redefined, and a management of change programme has taken place to reshape the service in line with defined LA priorities.

EAS & Caerphilly

Moving forward the EAS will still provide school improvement services for the LAs within the Partnership. This includes Blaenau Gwent, Torfaen, Monmouthshire and Newport. The redefined service will deliver school improvement services, professional learning (in line with national expectations) and governor support services. Each LA has their own local improvement plan with priorities derived from evidence from schools and settings. Local headteacher strategy groups have been established in each of the LAs to contribute to determining approaches to school improvement at a local level and across the partnership. The governance model has been revisited and strengthened.

Caerphilly was previously part of the EAS but in discussion with headteachers made the decision to take back to LA level full responsibility for the delivery of services for school improvement, support to non-maintained nursery settings and governor support services for the academic year 2025-2026. They continue to commission some professional learning for schools and PRUs from EAS. This has been confirmed as a 3-year arrangement and they will formally withdraw from August 2027.

Mid Wales Partnership

This is an informal partnership between Powys and Ceredigion that has existed since the exit from ERW arrangements. The partnership is informal and does not employ staff independently of the LAs, but it does allow access to staff time and expertise across the area. The arrangements have not been impacted significantly by recent changes.

NPT

The local authority has a formal partnership with Partneriaeth for the delivery of the Teaching Assistant Learning Pathway. Previous joint working on other national programmes has ended with the changes due to establishing Dysgu.

The LA remains open to commissioning further support as necessary in the future.

2.5 System oversight of the changes and next steps

Estyn's more frequent engagement with schools - with a core inspection and an interim visit every 6 years - will provide regular, independent advice on the impact of these changes at school level. This on-going professional dialogue between schools and the inspectorate will also support the improved rigour of self-evaluation and improvement planning.

The review was also clear that the “role of funding, inspection, and governance in incentivising collaboration across schools and clusters” needed to be considered in light of the new policy direction. EIT visits with school leaders, LAs and the Head Teacher Ministerial Advisory Group have reinforced the need to align the new policy direction with revisions to the accountability system.

Further work is on-going to consider the implications of these changes on schools governing bodies and the role of inspection.

2.6 Using data and information to support learning and improvement at all levels

Data and information play a crucial role in evaluation, improvement and accountability processes. It allows us to measure learners' progress, so they attain the highest possible standards while giving a national oversight of the education system in Wales.

Our expectation is that the use of data and information is proportionate and balanced, it should be impactful in driving improvements for learners. Both qualitative and quantitative data are important to gain a full and rounded picture. By using data and information in appropriate ways it supports a system-wide focus on what matters and helps to provide a comprehensive and balanced set of information for learners, parents and carers, schools, local authorities, national government, and other partners.

Our focus on data supports understanding without placing additional burdens upon the workforce or driving negative behaviours. It reflects our shift away from a “high stakes” model of data use, where a few results provided a judgement on the performance of a school, towards one that prioritises supporting and informing individual learners' progression.

Our recent consultation¹⁰ on the use of data and information to support learning and improvement led to the development of a set of *Information Ecosystem* principles, designed to promote a shared understanding of how data should be used across the education system and to provide assurance about how the Welsh Government uses the data it collects. Consultation responses showed broad support for this approach, and the published *Decision Report* confirmed that the principles will be implemented, with minor refinements. This framework will help ensure a proportionate and balanced approach to data use, enabling practitioners to support learner progression effectively while strengthening transparency and confidence across the system.

2.7 The 14 to 16 Learner Entitlement Indicators Framework

Evidence¹¹ and extensive engagement demonstrated that the existing reporting arrangements for end of Key Stage 4 outcomes are not well suited to supporting 14–16 learning and improvement under the Curriculum for Wales. The 14–16 Learner Entitlement, as set out in the guidance on 14–16 Learning, provided the foundation for proposed future reporting arrangements. These were designed to align with the ethos of the Curriculum for Wales and the Welsh Government's commitment to using data to support learning and improvement.

As part of the public consultation held between January and March 2025, we sought views on a proposed 14 to 16 Learner Entitlement Indicators Framework to support 14 to 16 learning under the Curriculum for Wales and aid public understanding of how individual schools are delivering this through the availability of school-level data and information on a publicly accessible platform.

Following consideration of consultation responses and feedback gathered through the widely attended 14 to 16 learning leadership events, we published a Decision Report¹² in July 2025.

The report confirmed that the 14 to 16 Learner Entitlement Indicators Framework will be implemented as a set of information designed to reflect the full breadth of the Learner Entitlement. The Framework will support 14 to 16 learning under the Curriculum for Wales and enhance public understanding of learners' experiences in schools. The Welsh Government is committed to all learners following stretching and ambitious qualifications in literacy, numeracy, and the sciences,

¹⁰ Welsh Government, Consultation, January to March 2025, *Data and information to support learning and improvement: for those working within the school system*

¹¹ Welsh Government (January 2023), *Research exploring a new information system for schools*

¹² Welsh Government (July 2025), *Decisions report: outcomes from the consultation on using data and information to support learning and improvement*

but recognise the critical issues around wellbeing/readiness to learn, wider experiences, and preparation for post-16. This is in line with international expert advice and good practice on education policy.

Qualifications-based indicators will be reported at the level of individual qualifications, including entries and outcomes data, with results presented across grade ranges. Importantly, these will not rely on complex composite measures that combine multiple qualifications. Where possible, indicators will be published in both a contextualised¹³ and disaggregated¹⁴ way.

The Framework will outline what the Welsh Government will routinely publish about each school alongside what information we will ask schools to make available (much of which is information schools already make available) to support our aim of providing a balanced and transparent view of learners' experiences and outcomes that directly reflect the 14 to 16 Learner Entitlement.

We are continuing to work closely with the education sector to refine future 14 to 16 indicators and reporting arrangements. Over the autumn and winter, a series of online workshops with leaders and practitioners will take forward the development of these indicators, refining their detail and exploring the risks and benefits of different options. Alongside this, we will continue wider engagement across the system and with key partners, including parents and the public. These ongoing discussions will ensure that the design of indicators and associated analyses supports transparency while minimising the risk of unintended negative consequences for learners and schools.

New reporting arrangements aligned with this Framework will be introduced for the first time with the summer 2027 outcomes, coinciding with the first cohort of 14 to 16 learners to complete Year 11 under the Curriculum for Wales.

2.8 Digital tools and reporting systems to support use and communication of data

The Welsh Government hosts and reports school-level data through the My Local School¹⁵ (MLS) website, providing a range of clear and publicly accessible data

¹³ Contextualised data refers to data that is presented with relevant background information, either with context built into indicators or such as comparisons to national averages, historical trends, or demographic factors. This helps users interpret the data meaningfully within its particular context.

¹⁴ Disaggregated data refers to data that is broken down into sub-categories (e.g. by sex, eligibility for Free School Meals or Additional Learning Needs) to allow for more detailed analysis and to highlight differences that may be hidden in aggregated figures.

¹⁵ *My Local School*

and information regarding each school in Wales for parents, learners, carers and the wider public. Data is also regularly reported through the StatsWales¹⁶ website and through regular statistical releases published on the gov.wales¹⁷ website. MLS was launched in 2013.

The All Wales Core Data Sets (AWCDS) are contextualised analyses provided annually by the Welsh Government to schools and local authorities to support self-evaluation and improvement planning. First introduced in 2008, they have been issued each year with the exception of the pause during the pandemic. The scheduled releases include contextualised attainment and attendance analyses, together with a range of comparators to help schools and local authorities understand learner outcomes within their own context. The AWCDS are produced specifically for use in schools and local authorities for self-evaluation and improvement purposes and are not published.

As part of our ongoing commitment to improving the use of data in education, we are exploring options for national digital tools that can promote effective, equitable, and transparent data use across the school system. These tools will support self-evaluation, improvement, and accountability, and will include both a public-facing platform to strengthen public understanding of learning in schools, and enhanced reporting systems for schools and local authorities. Building on or replacing My Local School and the All Wales Core Data Sets, the new tools will provide more sophisticated ways to interrogate meaningful data to support learning and improvement. The exploration phase will also consider how these systems can facilitate greater collaboration for evaluation and improvement, and how the flow of information across the system can be strengthened through system linkages or more streamlined, secure methods of transferring data.

A comprehensive discovery exercise has been commissioned, which will involve user engagement and options appraisal which we expect to complete in Spring 2026. This will inform digital system solutions, which we expect to be in place to facilitate first reporting of examination results under new 14 to 16 Learner Entitlement Indicators Framework arrangements in Autumn 2027 - with the first Year 11 cohort completing their 14-16 learning under Curriculum for Wales and taking the new National 14-16 Qualifications¹⁸ in summer 2027. Emerging evidence and stakeholder feedback have highlighted wider system needs to strengthen equity and inclusion. A key priority is improving learner-level data flows between schools, EOTAS/PRUs, and further education settings. Enhanced

¹⁶ Stats Wales, [*Find statistics and data about Wales*](#)

¹⁷ Welsh Government, [*Statistics and research*](#)

¹⁸ Qualifications Wales, [*National 14-16 Qualifications*](#)

data sharing of this kind is critical to ensuring continuity of learning and to identifying gaps in provision that may otherwise hinder progression.

2.9 Local level data to support learning and improvement

Since the introduction of the Curriculum for Wales, Welsh Government has moved away from linking school-level assessment data to accountability. This shift reflects concerns about the negative impact of high-stakes assessments on curriculum design and learner progress, the tendency to 'teach to the test,' and the potential harm to the well-being of both learners and staff.

Personalised Assessments (PAs) provide national-level insights into patterns of learner attainment over time in reading and numeracy. These assessments are mandatory for pupils in Years 2 to 9 and enable the tracking of attainment trends using a standardised reference cohort. An annual statistical release and equalities analysis are published based on this data.

The primary purpose of PAs is formative - to support teaching and learning - rather than summative. Schools receive detailed learner-level data, including individual strengths and areas for development, which they use to inform teaching and learning alongside the range of their locally held data. Relevant information is also shared with parents to support understanding of learner progress. Schools are not required to share their school personalised assessment data with local authorities though some choose to as part of a trusted collaborative partnership.

Wales's approach to assessment and the sharing of attainment data aligns with practices in high-performing education systems globally¹⁹. However, this approach has also presented challenges across different levels of our evolving and maturing education system which have been reflected in some of the evidence heard by the Committee.

Schools have adopted differing approaches to assessing learner attainment and progress pre-16. While these methods support local understanding, they have not wholly enabled a consistent or shared understanding across schools or between schools and their School Improvement partners. System level feedback from the Education Improvement Team highlights some promising examples of school clusters that have developed effective ways to assess and discuss learner progress. However, the broader challenge remains achieving consistency across the system.

¹⁹ Welsh Government (5 October 2020), Press Release, *OECD recognise Wales' 'clear vision for its education system and its learners' in new independent report*

While there is broad consensus across the sector against a return to high-stakes, accountability-driven performance measures, there is also growing recognition that quantitative data must play a role - as part of a broader, balanced understanding of learner and school progress informed and supported by collaborative improvement across schools. In areas where schools and local authorities are embracing the vision of a self-improving system, this has led to open data sharing and collective responsibility. In such contexts, the system functions as intended - driven by trust, shared purpose, and mutual accountability. Our view is that it will be a strong indicator of improving trust across the sector if voluntary sharing of school level data, including assessment data can be achieved.

Enhancing Personalised Assessment reporting to support learner progress

At the local level, personalised assessments in numeracy and reading provide schools, learners, and parents with valuable insights into individual progress and skill development. These assessments are designed to support teaching and learning by offering formative feedback. A suite of group-level reports is available to schools, enabling practitioners to identify areas for further development as well as learner strengths.

Recent upgrades to the system architecture have enabled more dynamic reporting and laid the groundwork for a new reporting dashboard. Practitioner feedback shows strong demand for greater flexibility in viewing and downloading assessment data, with practitioners in particular highlighting the value of currently available age-standardised²⁰ scores for tracking learner progress over time.

To inform the dashboard's design, stakeholder focus groups were held in September 2025. Participants recognised that data needs vary by role: senior leadership teams often require whole-school level information, including cohort comparison, while classroom teachers are more likely to focus on individual learner trajectories, age-standardised scores, a view across all subjects assessed, and class-level skills profiles. Practitioners also stressed the importance of integrating personalised assessment data with other locally held data and information to help identify learners who may need additional support or greater challenge.

In response, a prototype dashboard is being developed and will be piloted with users from November 2025. Subject to successful testing and evaluation, it will be integrated into the personalised assessment system after Easter 2026.

²⁰ The age-standardised score compares a learner's performance with peers born in the same year and month who took the assessment at the same point in the school year.

2.10 Clearer age-related expectations linking with personalised assessment reporting

Alongside the dashboard, we are developing a new report that will allow schools to compare their learners' attainment against national, consistent age-related information. The report will be informed by the newly developed Professional Learning Resources which outline age-related expectations through enhanced granular detail for practitioners.

Many stakeholders have indicated that data connected more explicitly to age will support learner attainment by helping teachers to identify learners for support or challenge. They may also play a role in supporting schools' self-evaluation by providing a common reference point for collaborative work with other schools.

This is not a return to 'high stakes' accountability and should not detract from the focus on supporting each learner to progress to the best of their ability. The new report will provide an additional piece of learner information that is available to schools through personalised assessments and which they can use alongside other data and information to support their learners and to help them progress.

Development will take place throughout this academic year, informed by engagement with stakeholders. We intend to pilot the report in summer term 2026, with the aim of making the report available for Years 2 to 9 in the Personalised Assessment system from September 2026.

3. Learner outcomes and standards: what the evidence tells us

3.1 National overview

To give us a rounded and balanced picture of schools and learning in Wales we draw from a range of evidence to understand how outcomes and the context in which schools are working have changed over time. We adopt an outward-looking perspective to situate progress in Wales in an international context.

We engage regularly across the range of our partners and use that local intelligence alongside annually available data and statistics such as that relating to qualifications, attendance and personalised assessments, as well as results from PISA (Programme for International Student Assessment- a worldwide study conducted by the OECD (Organisation for Economic Co-operation and Development) that evaluates education systems by testing the skills and knowledge of 15-year-old students in reading, mathematics, and science), Schools Health Research Network surveys, Estyn's annual and thematic reports as well as insight offered through research. We also work closely with the OECD and other international partners like the Atlantic Rim Collaboratory as well as having regular discussions with UK counterparts on shared challenges.

Wales has the following key sources of quantitative data available on learner outcomes that provide oversight of system progress:

- statistical releases based on personalised assessments in reading and numeracy for learners from Year 2 to Year 9
- examinations results/key stage 4 and sixth form outcomes on learners' qualification awards
- Programme for International Student Assessment (PISA) data and survey findings
- Destinations/Not in education, employment or training (NEET)
- Attendance
- Exclusions

We have also committed to joining international assessments of literacy, numeracy, and science at Year 5. Participation in PIRLS (Progress in International Reading Literacy Study) and TIMSS (Trends in International Mathematics and Science Study) will provide valuable insights into learner progress at younger ages and offer important international perspectives. Like PISA, these studies are sample based and voluntary, providing national level data. We are committed to engaging the sector meaningfully with the findings, ensuring that results are clearly communicated and used to inform both policy and practice.

Learner outcomes, the impact of COVID-19 and our post-pandemic recovery journey

PISA 2018 results indicated encouraging progress, with Wales' scores converging towards the OECD average and narrowing the performance gap. However, multiple data sources illustrate the negative impact of the COVID-19 pandemic on learner attainment and outcomes, both during the period of disruption and as the system began to recover.

PISA 2022 results reflect this setback, showing a significant decline compared to 2018. Wales' average scores in mathematics and reading fell, consistent with a broader downward trend across OECD countries, likely a consequence of the pandemic's widespread disruption to education.

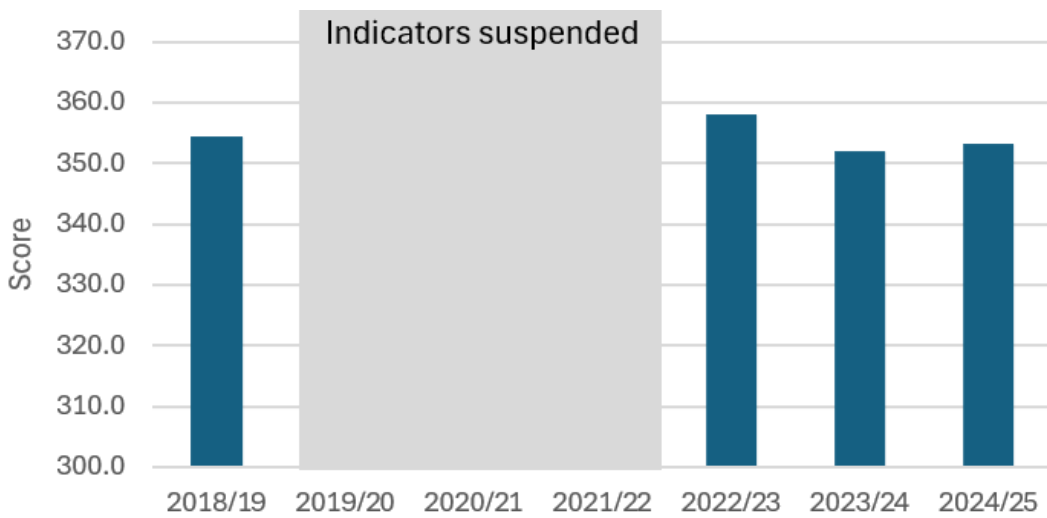
More recently, however, emerging data sources suggest signs of recovery. A more positive national picture is beginning to take shape, indicating that the education system in Wales is gradually rebounding from the disruption caused by the pandemic.

Key Stage 4 outcomes

Provisional 2024/25 Key Stage 4 indicators show areas of improvement on 2023/24, making further progress towards levels seen in 2018/19. In 2024/25 there has been broad stability across most Key Stage 4 headline indicators and improvements across all key grade ranges since 2023/24 for GCSEs.²¹ The only headline indicator which has not seen improvement is the Skills Challenge Certificate points score. All headline indicators remain below outcomes in 2018/19. Explanations on headline indicators can be found in Annex A.

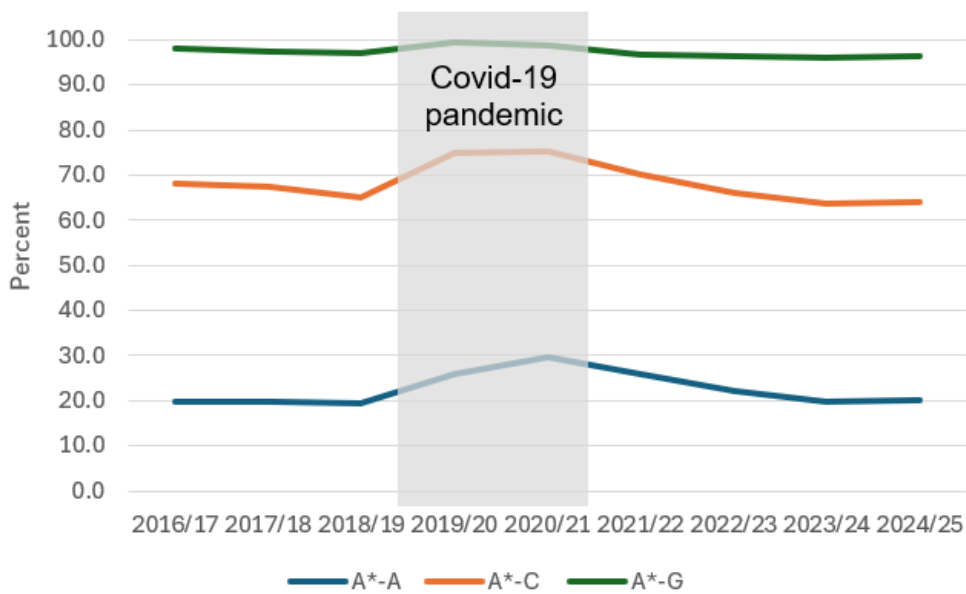
²¹ GCSE qualifications offered by boards other than the WJEC are awarded using the 9-1 grading structure. Whilst there is no direct read across from the 9 to 1 system to the A* to G system at all grades, analysis can be undertaken at 3 'anchor points': A*-A, A*-C and A*-G. Analysis is therefore focussed on the anchor points that are consistent across both grading structures, i.e. A*-A (9-7), A*-C (9-4) and A*-G (9-1), in order to include all awards for learners in Wales. We also refer to these as 'key grade ranges'.

Figure 1: Capped 9 points score (interim measure version), since 2018/19



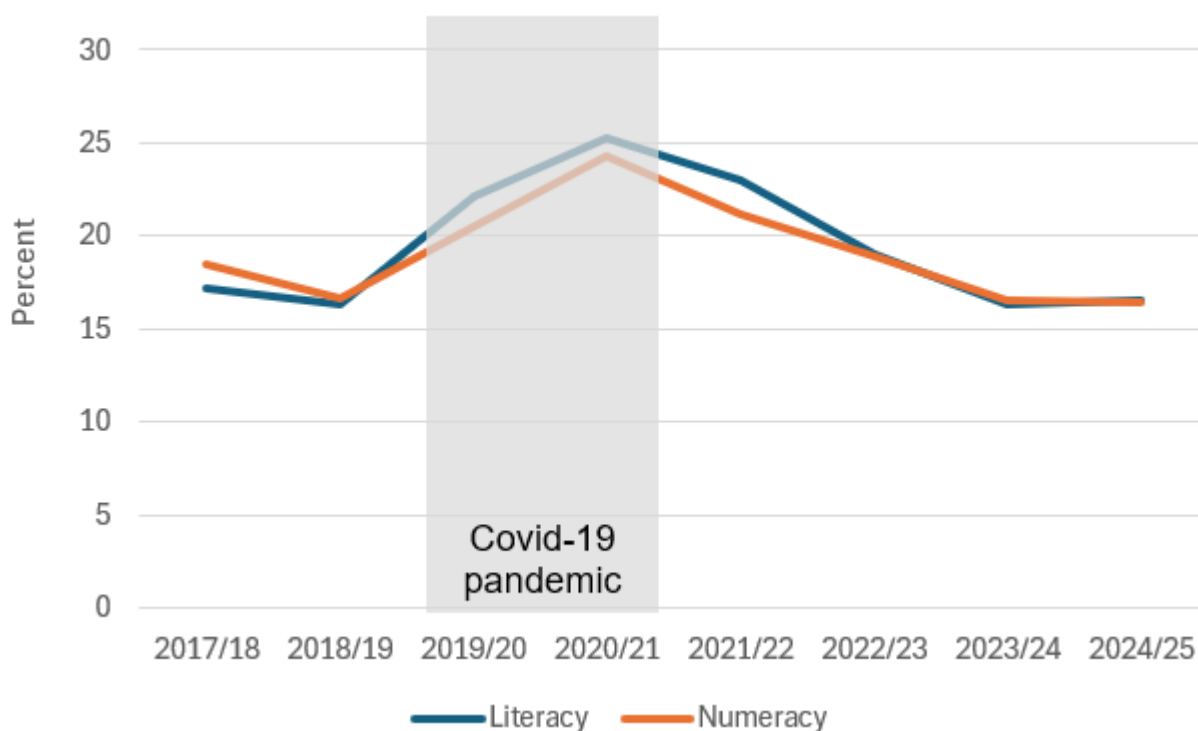
Source: Welsh Examinations Database (WED), Pupil Level Annual School Census (PLASC)

Figure 2: Percentage of GCSE results for pupils in year 11 achieving across key grade ranges in all subjects by year



We see variation when looking at key grade ranges for individual subject areas.

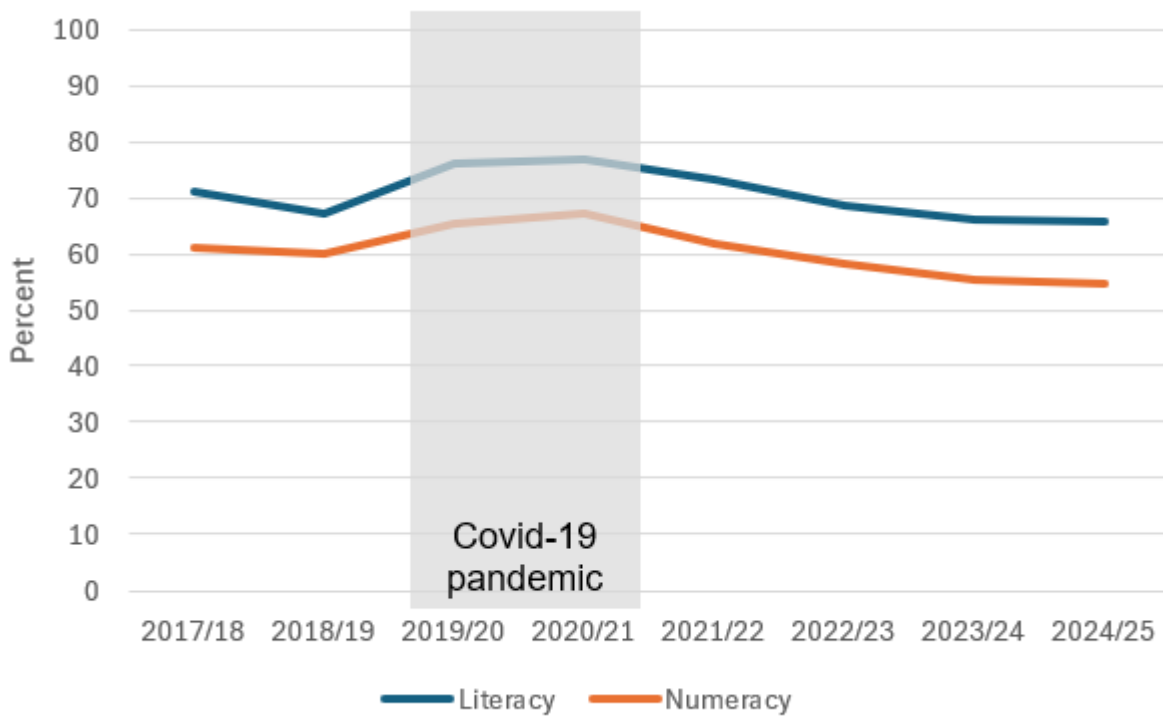
Figure 3: Percentage of GCSE results for pupils in year 11 achieving A*-A by subject area and year



Source: Welsh Examinations Database (WED), Pupil Level Annual School Census (PLASC)

The percentage of pupils in year 11 achieving A*-A is broadly comparable with 2018/19.

Figure 4: Percentage of GCSE results for pupils in year 11 achieving A*-C by subject area and year



A levels

Figure 5: Percentage of A level results for pupils age 17 achieving across key grade ranges in all subjects by year

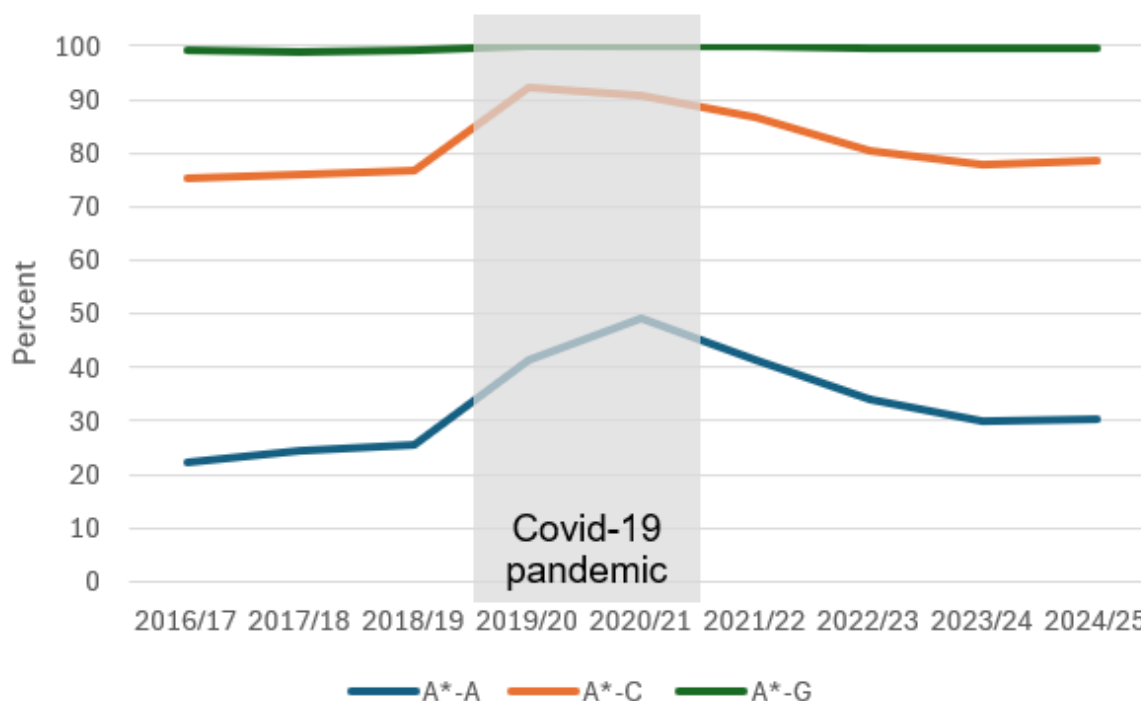


Figure 5 shows that A level results have surpassed levels achieved in 2018/19, most notably at the top grades A*-A.

Personalised Assessments

Personalised Assessments were developed to support progress at an individual level. Anonymised data from personalised assessments also provide information on reading and numeracy attainment at a national level, showing changes over time and differences between demographic groups.

Published in June 2025, data from personalised assessments²² shows signs of improvement in Procedural Numeracy, Welsh Reading, and notably English Reading, compared to 2022/23.²³

²² Welsh Government, *Patterns of attainment in reading and numeracy*

²³ Numeracy (Procedural) was introduced in 2018/19 and is the only assessment for which there is data available before and after the COVID-19 disruption. The Welsh and English Reading assessments were introduced in the 2019/20 academic year, however there was insufficient data available for that year due to the disruption caused by the COVID-19 pandemic. Numeracy (Reasoning) was rolled out in 2021/22.

English Reading attainment in Year 3 has reached its highest level to date, a sustained improvement in attainment not seen in other assessments or year groups.

Alongside the attainment data we see similar patterns in the wider suite of outcomes such as:

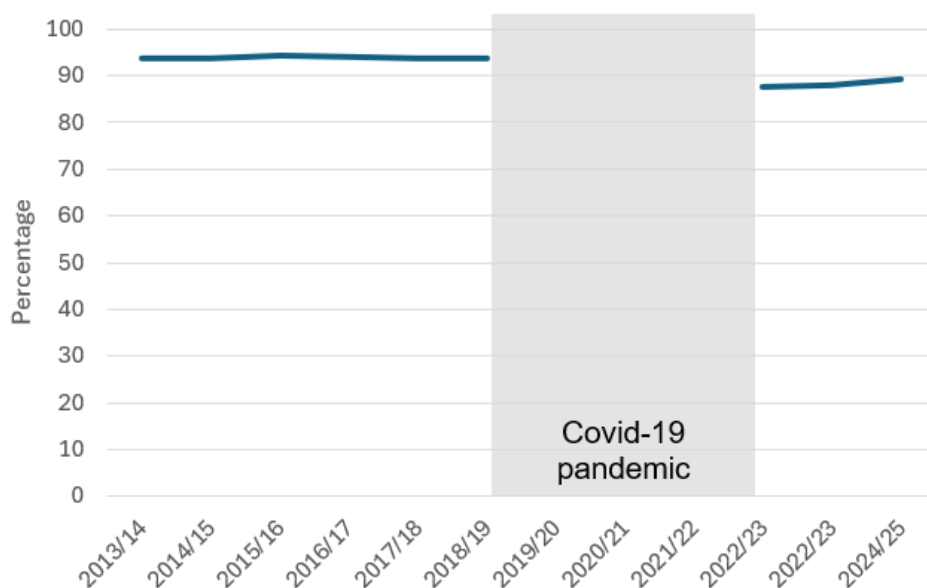
- a recovery in attendance since 2022/23.
- a comparable rate of 16- to 24-year-olds not in employment, education or training to the pandemic and 3.3 percentage points decrease over the last decade²⁴.

3.2 Pupil attendance

In the 2024/25 academic year, the percentage of half day sessions attended by secondary school-aged learners was 89.1%. This was below the pre-pandemic level (2018/19) at 93.8%. However, the percentage has steadily increased in the last two school years (87.5% and 88.0%), reflecting a positive trend.

²⁴ Welsh Government (June 2025), *Young people not in education, employment or training (NEET): April 2024 to March 2025*.

Figure 6: Percentage of half-day sessions attended from secondary school-age pupils, 2013/14 to 2024/25



Source: Attendance Data Collection: Secondary 2024/25 (includes maintained middle, secondary and special schools)

Note - There is no data in this collection for the years 2019/20, 2020/21, 2021/22. The years where there is data are indicated by the circular markers on the lines. The pandemic period is shaded grey

The data also shows that attendance decreases as the learners get older, with attendance in 2024/25 being lowest for year 11 learners (86.8%). Whilst these are lower than the pre-pandemic level the trend shows the figures have been improving year-on-year since 2022/23 for all year groups.

The percentage of secondary school-aged learners that were persistently absent (above 10% threshold), has fallen from 40.1% to 33.0% between 2022/23 and 2024/25. However, this is still nearly double the level in 2018/19 at 17.1%.

This demonstrates the impact on attendance from the pandemic across schools. To support schools, Estyn have produced a thematic report focusing on 'Improving attendance in secondary schools, in January 2024 with an update in May 2025, outlining the approaches schools have used to improve their attendance.

While the data shows that attendance is improving, and that this has been sustained over a number of years, we are not complacent about matters. Overall attendance levels remain lower than they were pre-pandemic, with specific concerns around the attendance levels for eFSM learners and the numbers of children who meet the definition of persistent absence.

We issued revised attendance guidance to schools in October 2023 and over the course of 2024-25 and 2025-26 we have invested an additional £8.8m in funding to tackle issues with attendance, disengagement, and disaffection. In 2024-25

the £1.8m in additional funding went towards support for Family Engagement Officers and the provision of enrichment activities. The £7m provided this year was split as follows:

- £3m supporting the work of Family Engagement Officers;
- £2m supporting the provision of enrichment activities;
- £1 million to further embed the role of Community Focussed Schools; and
- £1 million to support our School Holiday Enrichment Programme.

There is no one-size fits all approach to tackling absence and it will take time. The issues behind non-attendance are complex, often requiring intensive, and multi-agency support. This includes mental health and wellbeing support, the availability of specific learning support services, and the ever-rising cost of living and attitudes of parents and learners towards school attendance generally. Earlier this summer Estyn updated their thematic review on attendance, with a new recommendation relating to the setting of targets. We have accepted this recommendation and will be working with local authorities and other partners to ensure both that our expectations are fully understood and that schools have clear pathways and trajectories for improvement.

3.3 Destinations data

Provisional data for 2024/25, suggests that 90% of learners in Wales progressed from Year 11 to tertiary education²⁵.

Participation of young people in education and the labour market and young people not in education, employment or training (NEET)

The definitive source of young people not in education, employment or training (NEET) is the *Participation of young people in education and the labour market*²⁶, this uses a range of data sources to estimate participation.²⁷

The final estimates for 2022 indicate that the proportion of 16-24 year-olds who were NEET decreased from 16.0% in 2021 to 13.9% in 2022. Provisional estimates for 2023 suggest that this proportion has continued to decrease to 13.6%.

One of the downsides of this data source is that it's less timely than other data sources. The Annual Population Survey (APS) allows us to provide more detailed and timely statistics on young people (those aged 16 to 24) who are NEET in

²⁵Medr (25 February 2025), *Progression from Year 11 to tertiary education, August 2017 to January 2025*.

²⁶ Welsh Government, *Participation of young people in education and the labour market*

²⁷ Welsh Government, *Understanding the different sources of statistics on young people not in education, employment or training (NEET) in Wales*

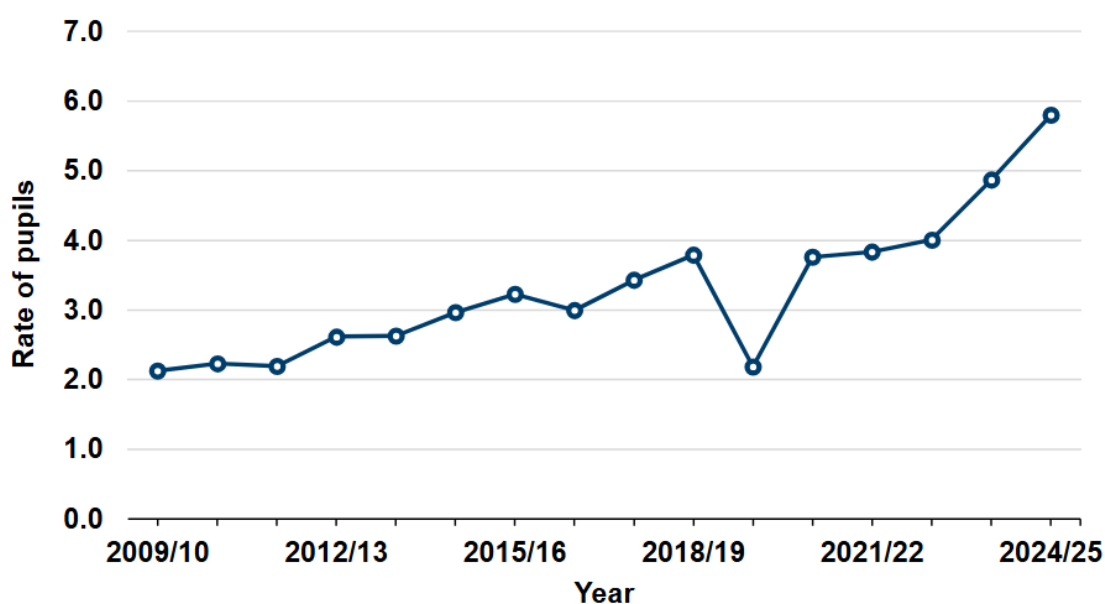
Wales.²⁸ However, the APS estimates have become increasingly volatile in recent years and are less statistically robust than the SFR estimates, therefore we'd advise caution when interpreting this data.

The APS²⁹ source shows the proportion of young people aged 16 to 24 in Wales who were not in employment, education or training (NEET) was 15.1% in the year ending June 2025, an increase of 3.6 percentage points over the year.

Education otherwise than at school

Over the past decade, there has been an increase in the proportion of pupils receiving some type of Education Otherwise Than at School (EOTAS). We define EOTAS learners as those mainly educated outside of school, which includes learners with a subsidiary enrolment (spending some time in school), and pupils exclusively receiving education outside of school.

Figure 7: Rate per 1,000 pupils mainly educated outside school, 2009/10 to 2024/25



In 2024/25 5.8 of every 1,000 pupils in Wales were EOTAS, which is up from 4.9 of every 1,000 pupils in 2023/24 and the highest rate since the data was collected in 2009/10.

²⁸ Welsh Government, [Young people not in education, employment or training \(NEET\): July 2024 to June 2025](#)

²⁹ Welsh Government, [Young people not in education, employment or training \(NEET\): July 2024 to June 2025](#)

Elective home education

The figures on levels of EOTAS learners do not include learners electively home educated in Wales. Parents voluntarily notify their local authority that they are home educating their children (unless they have withdrawn their child from school). This means the data might not include all electively home educated children.

In 2024/25, 7,176 children were known to be electively home educated in Wales. This is a rate of 15.3 learners in 2024/25 for every 1,000 pupils, which doubled between 2018/19 and 2022/23. This rate has increase in all local authorities across Wales, and is most common for 15-year-olds.

3.4 Emotional well-being and behaviour

The Welsh Government held a national behaviour summit in May 2025, bringing together stakeholders, partners and practitioners. The outcomes were summarised in a report published in July 2025.³⁰

The Behaviour Summit highlighted the range of issues being seen in schools and wider education settings, spanning both learner behaviour and sadly that often seen from parents and carers. As with attendance, the reasons for poor behaviour in schools can be complex and often associated with a range of factors outside of the school. This can include emotional and mental health issues, physical health conditions, bullying, additional learning needs and in some cases the impact of wider family pressures including concerns about money and caring responsibilities. Simply punishing poor behaviour without taking the time to understand the drivers means that we never tackle the root causes, and do not improve matters for that child. Nor do we get to a point where they are able to fully engage with learning and education.

In recent years, demand for counselling among children and young people in Wales has continued to rise, reflecting wider concerns about young peoples' mental health.

- In 2023/24, 13,936 learners (Year 6 and ages 11–18) received counselling — a 13% increase on 2022/23.
- The average number of sessions fell slightly, from 6.1 in 2022/23 to 5.6 in 2023/24.
- Around two-thirds of recipients were female and one-third male, a proportion stable since 2016/17.

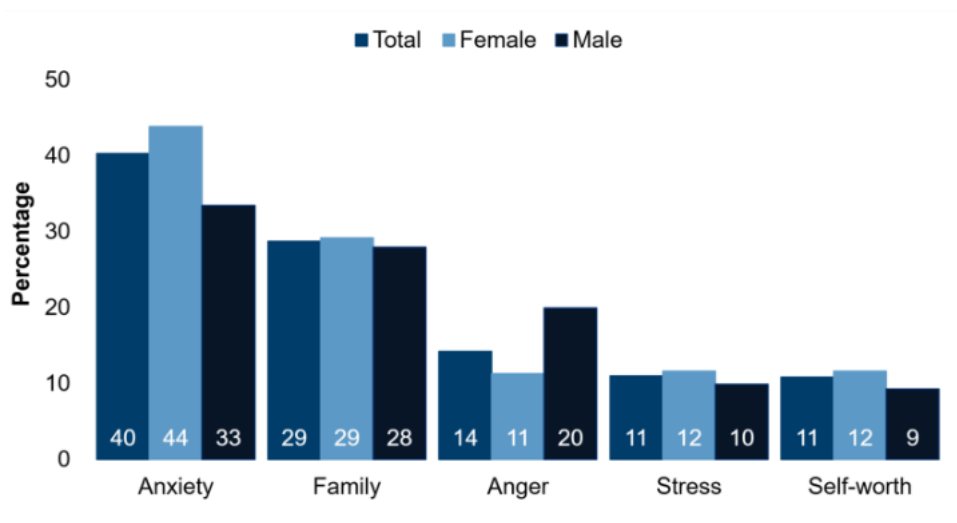
³⁰ Welsh Government (May 2025), *Behaviour summit: survey of education providers and support staff*

- Male participation remained steady across Years 7–11, while the number of females receiving counselling rose by 61.3% between Year 7 and Year 10.

Patterns of referral and reasons for counselling highlight important differences by sex and shifting trends in learner wellbeing.

- Referral routes: The majority of referrals came from schools and education staff (61%), followed by self-referrals. Females were more likely to self-refer (25% of female referrals) compared to males (17%), while males were more likely to be referred by school staff (64% vs. 59% for females).
- Reasons for referral:
 - Anxiety was the most common reason (40%), up from 23% in 2016/17 but down from 46% in 2022/23. More females (44%) than males (33%) were referred for anxiety.
 - Family issues ranked second, with similar levels across sexes.
 - Anger was third, with males (20%) more likely than females (11%) to be referred.
 - Stress and self-worth were the fourth and fifth most common reasons, both more prevalent among females.
 - Compared to 2022/23, the top three issues remain the same but have decreased slightly. Stress newly entered the top five in 2023/24, replacing bereavement.

Figure 8: Main reasons for referral for children and young people who received counselling, by sex, September 2023 to August 2024

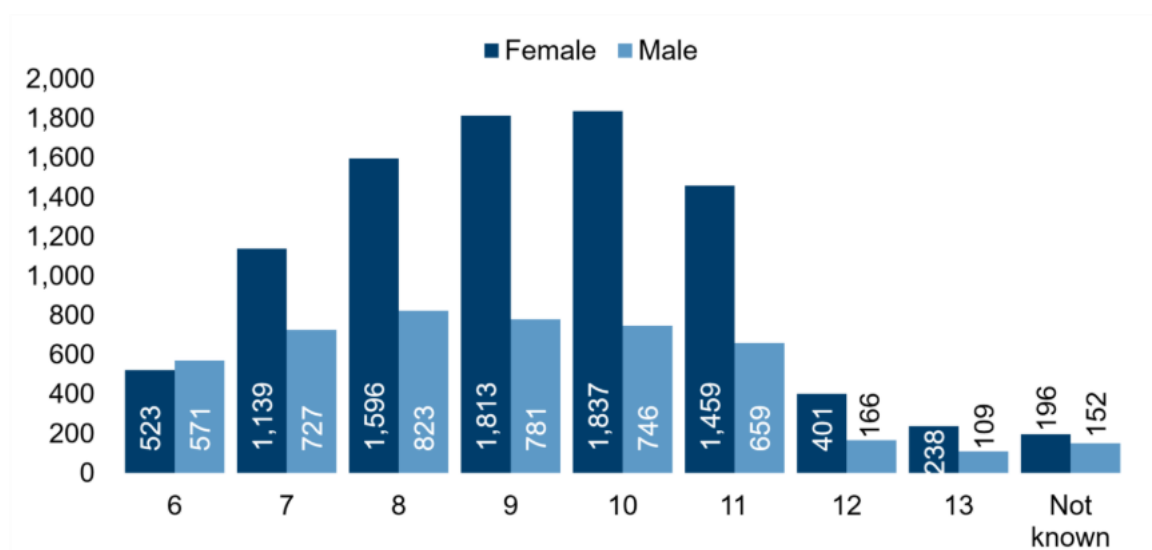


Source: Local Authority School Counselling Services collection, Welsh Government

In 2023/24, Year 9 pupils accounted for the highest proportion of counselling referrals (19%) among children and young people. From Year 6 onwards, the

number of pupils receiving counselling rises steadily, peaking in Year 9 before declining through to Year 13, which recorded the lowest number of referrals. Findings from the Secondary School Health and Wellbeing Survey (SHRN, 2023) reinforce this pattern: wellbeing scores -where higher scores indicate poorer mental health -were highest among females in Years 9 and 10, highlighting a particularly vulnerable stage in early adolescence.

Figure 9: Number of children and young people who received counselling in Wales by sex and school year age group, September 2023 to August 2024



Source: Local Authority School Counselling Services collection, Welsh Government

Note - "Not known" includes children who received counselling in school years 1 to 5

Following the Behaviour Summit we committed to take forward five immediate actions:

- creating structures to support multi-agency working to help organisations to come together to tackle the societal issues contributing to challenging behaviour.
- updating guidance for schools to ensure there is more clarity and consistency across Wales.
- establishing a system for sharing best practice between schools locally and nationally, taking lessons from approaches to preventing violence which are currently being tested in schools.
- developing professional learning opportunities focused on behaviour management techniques, de-escalation and intervention.
- ensuring consistent definitions and reporting of incidents and that a clear data set at local authority and national level was essential.

All teachers and school staff have the right to work in a respectful and safe environment. Poor behaviour should be addressed, and systems, policies and processes put in place to tackle it head on. However, by working in social partnership and drawing on multi-agency support structures, solutions can be found to ensure pupils continue to receive a suitable education, in a safe and nurturing environment for all, including for teachers.

Following the Summit we have established forums focussing on two critical areas: the use of mobile phones and social media in schools, and the issues surrounding exclusions and detentions. By bringing together a diverse group of stakeholders and practitioners, we are ensuring that a broad spectrum of voices and experiences inform next steps. We are also working with the Police about ways of collaborating to support schools with a range of behavioural and learning issues.

Anti-Racism

We are determined that every child in Wales has the support they need to reach their full potential, access the highest standards of education and to thrive. We acknowledge that some children and young people may experience barriers to learning, particularly within ethnic minority communities. Therefore, it is crucial that the Welsh Government provides support to remove these barriers and ensure equity of outcome.

We are providing a total of £11m to local authorities in 2025-2026 via the Minority Ethnic, Gypsy, Roma Traveller (MEGRT) element of the Local Authority Education Grant to fund these important support services. The MEGRT funding is intended to support children and young people who experience barriers to learning, the curriculum and education. These may include linguistic or language barriers, cultural barriers, and/or systemic and institutional barriers. This funding has supported the development and embedding of a wealth of expertise and good practice in education settings across Wales. In recognition of the differences and demographics across local authorities, the MEGRT funding is flexible in terms of use, to ensure children and young people are supported according to their needs. This flexibility of approach allows local authorities to provide support in a range of ways, for example providing English/Welsh language support to Roma learners and their families; developing resources for schools and practitioners; providing authority-wide events focused on anti-racism in education.

Since the original publication of the Anti-Racist Wales Action Plan, some progress has been made in all areas of education and learning within schools, Further and Higher Education. We have taken the opportunity of working with stakeholders to review, assess and revise some of these actions as well as

introducing new ones. The revised actions in the education part of the Anti-racist Wales Action Plan gives the Welsh Government an opportunity to take into consideration and incorporate evidence and recommendations from other reports. This includes the Children's Commissioner's report into racist incidents in secondary schools and the Senedd Committee on the ArWAP as well as published research and evidence.

To help schools support their Gypsy, Roma and Traveller learners, in December 2023 we published our new guidance Celebrate and Participate: education guidance to support Gypsy, Roma and Traveller children and young people. The guidance helps strengthen the support available to Gypsies and Travellers who have protected characteristics under the Equalities Act 2010, which also includes learners from EU Roma heritage. Supporting schools and education settings to understand and celebrate the cultures and traditions of Gypsies, Roma, and Travellers, as well as their specific needs in education, can help improve attendance.

We are also conscious of concerns around the levels of bullying and harassment on the grounds of faith and race, particularly in light of recent national and international events. We have provided guidance and support to schools and education settings on how to effectively address anti-Semitism and Islamophobia. We have also written to FE and HE institutions asking them to ensure that they are supporting students during the conflict. We expect schools and education services to make it clear that all forms of bullying, including on the grounds of race, are entirely unacceptable and to manage all incidents vigorously, ensuring that learners are properly supported. We recently consulted on our anti-bullying guidance, Rights, Respect, Equality and will be making adjustments in light of comments received. We aim to publish the final guidance later this year.

3.5 Variation of outcomes across different groups of learners

We have a particular interest in some groups of learners due to the relationship we see between certain characteristics and outcomes.

SED / deprivation / poverty

The national wellbeing indicators for Wales use median UK earnings to assess household poverty (Indicator 18). Between 2021–22 and 2023–24, 22%³¹ of people in Wales were living in relative income poverty, a rate that has remained broadly stable for over 19 years. This figure is higher than in Scotland and Northern Ireland, but broadly comparable with England.

For children, the picture is starker: 31% of children in Wales were living in relative income poverty over the same period, again comparable with England but higher than in Scotland (23%) and Northern Ireland (24%). In Wales, this represents a slight increase from 28% between 2019–20 and 2021–22. A study by Ofqual suggests that SED is one of the strongest indicators for learning loss during the pandemic³².

Learners eligible for free school meals

Eligibility for free school meals (eFSM) is widely used by the Welsh Government and across the school system as a proxy for deprivation or socio-economic disadvantage (SED). It is frequently employed to understand outcomes for learners most vulnerable to the impacts of disadvantage. While the availability of this indicator at learner level, and its link to household income, enables more detailed analysis of variations in impact and outcomes, it is recognised to have several limitations.

There are three main limitations to eFSM as a measure:

1. **Registration requirement** – parents must apply for FSM eligibility, meaning children whose parents do not apply are excluded from the data.
2. **Narrow criteria** – the threshold may not capture all children living in poverty. For example, the Child Poverty Action Group (CPAG)³³ recently estimated that around 20,000 children in Wales live in poverty but are not eligible for FSM under national schemes.

³¹ Households Below Average Income, Family Resources Survey, Department for Work and Pensions, sourced from StatsWales: *Percentage of all individuals, children, working-age adults and pensioners living in relative income poverty for countries and regions in the UK between financial year ending (FYE) 1995 and FYE 2024 (averages of 3 financial years)*.

³² Howard E, Khan A, Lockyer C, (21 July 2021), *Learning during the pandemic: review of research from England*, GOV.UK

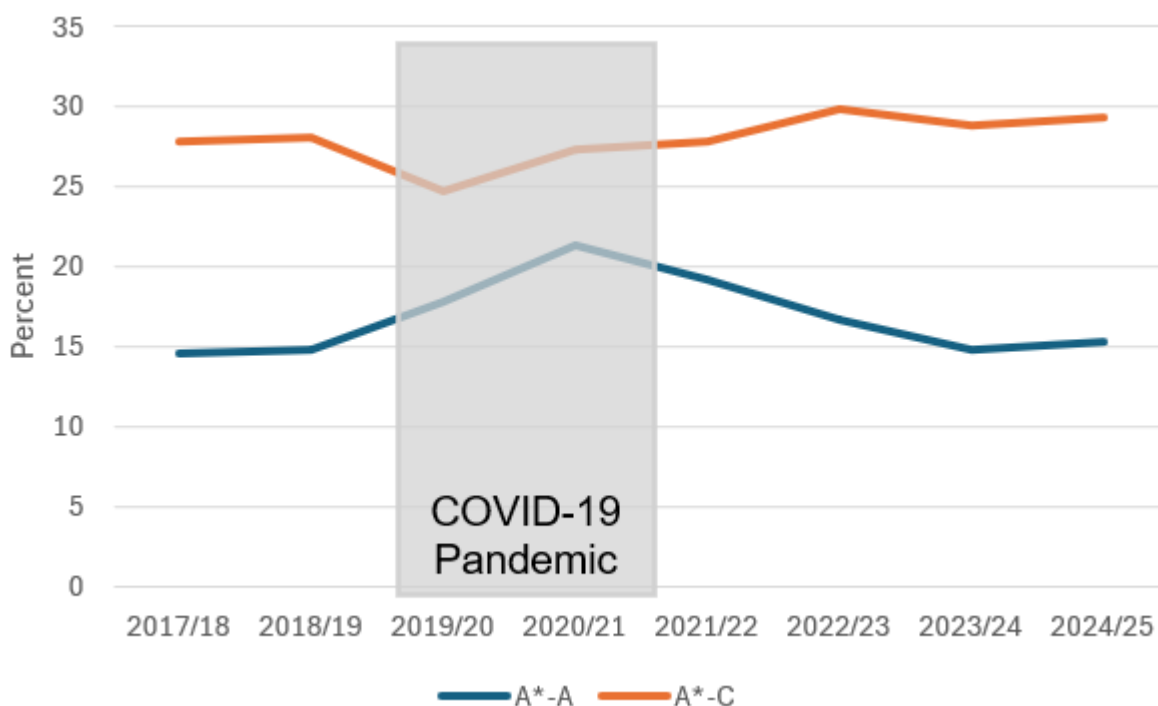
³³ Child Poverty Action Group (18 September 2024), *The number of children in poverty not eligible for free schools meals, by nation and region*

3. **Limited scope** – eFSM does not reflect the multi-dimensional nature of socio-economic disadvantage, potentially missing other relevant factors such as parent’s occupation³⁴.

Between 2023 and 2025, the proportion of learners eligible for FSM declined from 22.2% to 20.3%, though this remains above the 18.3% recorded in 2019. This trend conflicts with wider evidence showing that the number of children living in low-income households is increasing.

When using eFSM status to analyse attainment gaps, the Capped 9 points score (interim measures) for 2024/25 shows a slight widening of the gap between non-FSM (nFSM) and FSM learners compared with 2018/19. In 2024/25, nFSM pupils scored on average 80.0 points higher than FSM pupils, compared with 77.3 points in 2018/19. The gap has fluctuated over time, peaking at 87.1 points in 2022/23, though this period was still affected by disruption to exam arrangements following the pandemic.

Figure 10: Percentage point gap between pupils who are eligible for Free School Meals and pupils who are not eligible for Free School Meals for GCSE grades at A*-A and A*-C



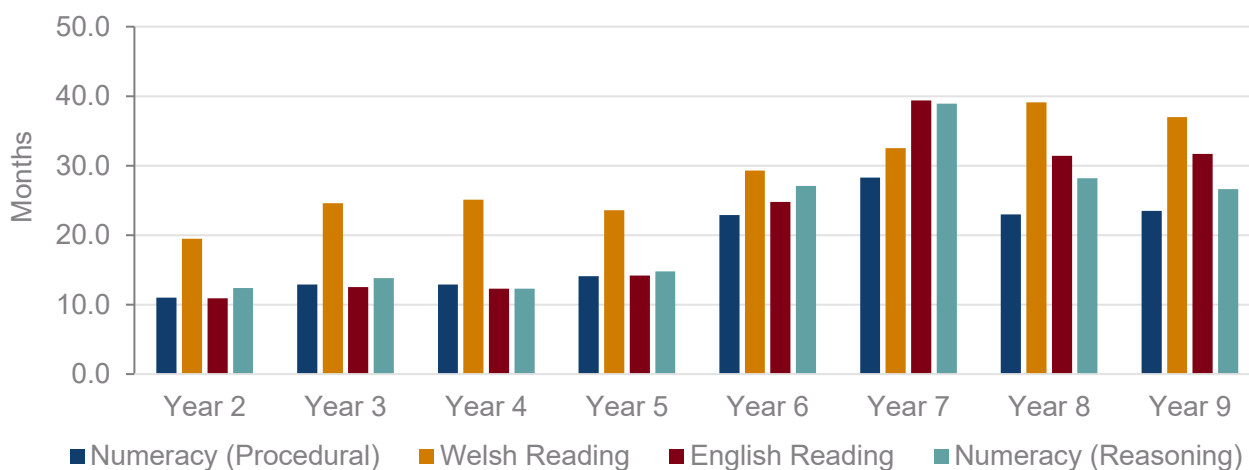
³⁴ Taylor C, (23 May 2017), *The Reliability of Free School Meal Eligibility as a Measure of Socio-Economic Disadvantage: Evidence from the millennium Cohort Study in Wales*, British Journal of Educational Studies, 66(1), 29–51

Note - Gap is calculated by score of pupils not eligible for FSM – score of pupils eligible for FSM

The latest statistical release based on personalised assessment data shows that learners eligible for Free School Meals (eFSM) continue to achieve lower average attainment than their peers not eligible for Free School Meals (nFSM) across all assessment types.

In 2023/24, the attainment gap in both numeracy and reading emerges as early as Year 2 and widens to a peak in Year 7. Although the gap narrows slightly after this point, by Year 9 it remains significant, with learners eligible for FSM at least 23 months behind their peers across all subjects.

Figure 11: Attainment gap (in month of eFSM and nFSM students) in 2023/24 cohort by year group and assessment type.

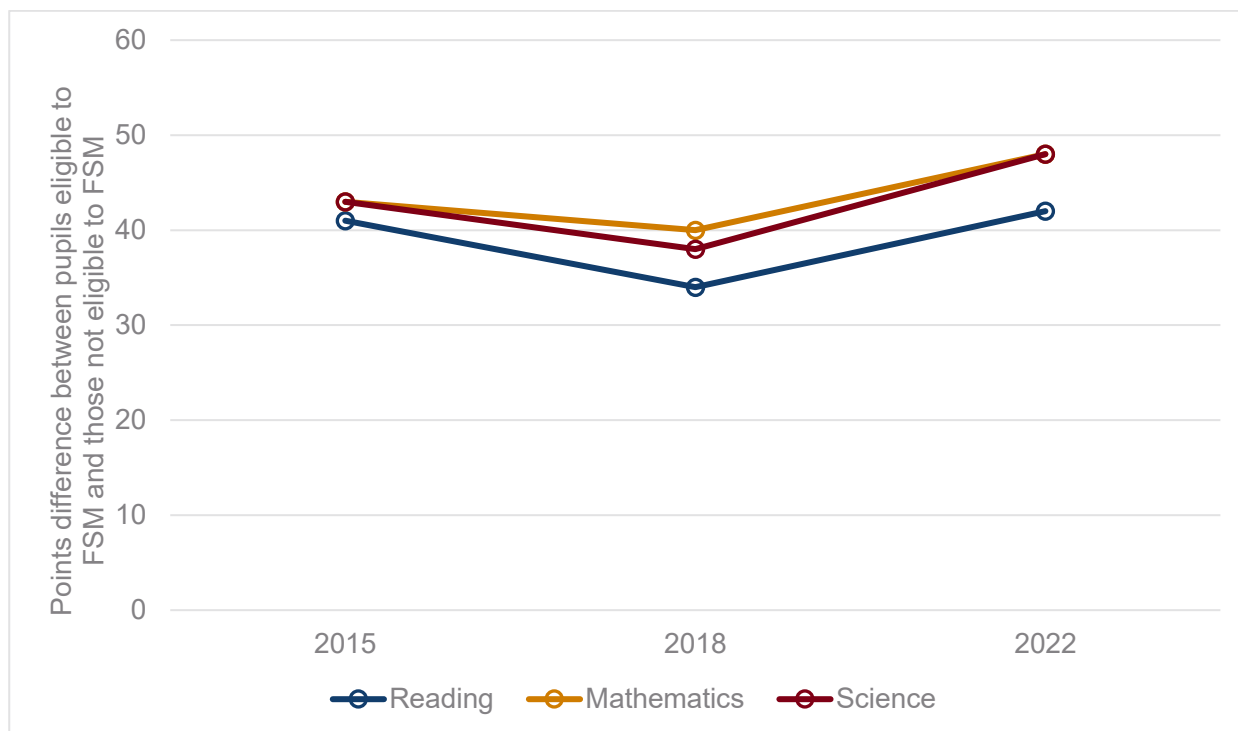


Source: Patterns of attainment in reading and numeracy, Welsh Government

**Note: A positive number indicates nFSM students have higher attainment levels than eFSM students. A negative number indicates eFSM students have higher attainment levels than nFSM students.*

Further evidence of the equity gap was highlighted in PISA 2022. Across mathematics, reading, and science, learners eligible for Free School Meals (eFSM) achieved significantly lower scores than their peers not eligible for FSM (nFSM). Moreover, the attainment gap between eFSM and nFSM pupils has widened compared with 2015 and 2018, underlining the persistence and growth of socio-economic disparities in educational outcomes.

Figure 12: Gap between pupils eligible for FSM and pupils not eligible for FSM by subject domain and year.



Absence rates continue to vary significantly between learners. In 2024/25 for secondary school-aged pupils, nFSM learners recorded an average absence of 8.9% compared with 18.8% for eFSM learners—a gap of 9.9 percentage points (pp). While this represents a slight reduction from the previous two years (10.4 pp), it remains notably higher than the pre-pandemic gap of 5.2 pp in 2018/19.

It is important to note that nearly half of EOTAS learners mainly educated outside school (45.0%) were eligible for free school meals in 2024/25, compared to 18.4% of pupils in mainstream and special schools (PLASC) eligible for free school meals.

Despite there being significantly fewer pupils eFSM, the overall number of exclusions was similar for pupils eFSM and those not eligible. The rate of permanent exclusions per pupil, demonstrates this, and was markedly higher for FSM learners. In 2022/23, the rate of permanent exclusions among FSM pupils was 1.9 per 1,000, almost four times higher than the rate for non-FSM pupils (0.5 per 1,000).

Destination data also highlights differences in learner pathways. A greater proportion of learners from deprived areas, and those eligible for FSM, progressed to further education (FE) colleges or work-based learning compared with their peers. However, only 39% of FSM learners continued to study at Level 3

(AS/A level equivalent), compared with 72% of non-FSM learners, underlining a significant progression gap.

Learners eligible for FSM or with Special educational needs (SEN) or Additional learning needs (ALN) were also more likely to leave their tertiary education programme without completing it.

Additional learning need/ Special education needs and disability

Examination results data enables comparisons across different learner demographics. Overall, gaps between pupils with ALN/SEN provision and those without have widened across the headline indicators since 2018/19, with further increases again this year. Outcomes for pupils with ALN/SEN provision remain consistently below those of their peers.

A particularly notable change is seen in the Capped 9 indicator, where the gap has grown due to a drop of 15.7 points for ALN/SEN learners since 2023/24, alongside a small increase of 1.9 points for non-ALN/SEN learners.

Exclusions are also more prevalent among pupils with special educational needs, with higher rates per 1,000 pupils compared to those without SEN. Learners with ALN/SEN Needs, Behavioural, Emotional and Social Difficulties (BESD), and Attention Deficit Hyperactivity Disorder (ADHD) have some of the highest rates of exclusions.

Ethnicity

The latest statistical release based on personalised assessment data highlights differences in attainment by ethnicity, benchmarked against White British learners (the largest ethnic group in Wales) in 2022/23. Chinese or Chinese British and Indian learners achieved the highest attainment levels across both numeracy assessments and English reading, while Gypsy, Roma and Traveller learners recorded the lowest levels. These trends have remained consistent across year groups.

At Key Stage 4, the Capped 9 indicator (interim measures) for 2024/25 shows that Black, Asian and minority ethnic pupils scored an average of 383.9 points, compared with 361.4 points for White British pupils—a gap of 22.5 points, widening from 19.9 points in 2023/24. A similar pattern is evident in A-level results, where the gap in pupils achieving A*–A grades between Black, Asian and minority ethnic learners and White British learners has increased to 4.86 percentage points.

In 2024/25, the highest rates of pupil absence for secondary school-aged pupils were recorded among those who identify as Travellers (28.6%, down from 32.6% in 2023/24) and Gypsy pupils (28.6%, up slightly from 28.4% in 2023/24). By

contrast, pupils who identify as Chinese or Chinese British had the lowest absence rate at 3.4%, a small decrease from 3.7% the previous year.

When looking at persistent absence of secondary school-aged pupils, pupils from Chinese or Chinese British backgrounds again had the lowest rate (6.8%), while Roma pupils had by far the highest (78.5%).

Analysis of APS data on young people not in education, employment or training (NEET) shows a different pattern. Over the three-year period ending June 2025, young White people were more likely to be NEET (13.9%) compared with young Black, Asian and Minority Ethnic people (9.7%).

Overall, while patterns across ethnicity, background, and other characteristics highlight important differences in outcomes, socio-economic disadvantage (SED) remains one of the most powerful and pervasive influences on pupils' learning and progression. A pupil's educational pathway is rarely shaped by a single factor; rather, it reflects a complex interplay of individual circumstances and broader systemic dependencies. Recognising the central role of SED, alongside these wider influences, is essential to understanding variations in attainment and to sustaining high standards across the education system.

4. A system wide approach to improving learner attainment and school standards

Improving learner attainment and raising school standards requires a coherent, system-wide approach that integrates curriculum reform, ALN reform, inclusive provision, qualifications reform, and targeted measures to address disadvantage. These reforms are underpinned by sustained investment and a focus on workforce capacity, recognising that well-resourced schools and a confident, supported workforce are essential to delivering change. Taken together, our central policy initiatives are designed to ensure that every learner in Wales has the opportunity to progress, achieve, and thrive, while building an ambitious and resilient education system that delivers both excellence and equity.

We note a number of partner publications (including from Estyn and Qualifications Wales) due over the coming weeks which will contribute to this overall picture and analysis.

4.1 Curriculum for Wales implementation

The Curriculum for Wales is focused on improving learner attainment and progression by embedding inclusive, learner-focused teaching. The July 2025 Curriculum for Wales Implementation Study has found that schools are increasingly using innovative and inclusive pedagogical approaches, strengthening links with local communities, and amplifying learner voice to shape relevant and purposeful teaching. These changes are helping learners engage more deeply and progress more confidently.

To support this transformation, the Welsh Government has invested £44 million in curriculum implementation, including targeted funding for literacy, numeracy, science, and digital skills. Over 200 schools have already benefited from the National Support Programme for curriculum and assessment design, with a further 600 schools and all local authorities joining this year. Estyn's thematic review into teaching the Curriculum for Wales confirms that most schools are refining their curriculum vision and teaching in line with national aims, with peer collaboration emerging as a key driver of improvement. These reforms are helping learners access the full breadth of the curriculum especially through strengthened support for foundational skills.

The CYPE committee heard evidence³⁵ on the implementation of the curriculum in its meeting in October.

4.2 Additional Learning Needs reform

The implementation phase of the ALN reforms concluded at the end of August 2025. The ALN system is now the sole statutory framework for supporting children and young people with ALN in Wales. In January 2025, there were 32,127 pupils with IDPs under the new ALN system in maintained schools (Pupil Level Annual School Census (PLASC)).

These reforms represent one of the most significant changes to the education system in a generation, introducing new duties, new ways of working, and a cultural shift across pre and post 16 education and health.

On 14 October, the Cabinet Secretary delivered an Oral Statement on the implementation of the ALN Reforms. On the same day Welsh Government published a summary of findings from the ALNET legislative review, the Evaluation of the Additional Learning Needs system: survey of parents and carers, and Education Tribunal Wales (ETW) published their evidence. The CYPE committee heard evidence on the implementation of ALN reforms in its meeting in October.

4.3 Reform of 14–16 learning and qualifications

Qualifications Wales has led a major reform of national 14–16 qualifications to align with the Curriculum for Wales. The first teaching of reformed Wave 1 GCSEs began in September 2025, with Wave 2 specifications published on 30 September for delivery from September 2026. These qualifications balance alignment with the curriculum, with the importance of the qualifications being portable and recognised beyond Wales. Once fully rolled out by September 2027, the new national 14-16 qualifications will provide an inclusive, coherent and bilingual suite for schools to offer their learners.

Supported by Welsh Government funding, WJEC has developed a comprehensive package of professional learning, guidance and resources for teachers, to ensure they are prepared to confidently teach the new GCSE qualifications. Qualifications Wales will also ensure that the first few cohorts of learners taking the new qualifications are not at a disadvantage due to having less familiarity with the specifications and assessments. To maintain fairness for

³⁵ [*Children, Young People and Education Committee, 23 October 2025*](#)

learners, the outcomes in these new GCSEs will be broadly similar to the outcomes in the existing GCSE.

Our 14-16 Learning Guidance sets out the Learner Entitlement which provides that a school's curriculum offer in Years 10 and 11 must provide learners with a broad and balanced profile of learning and experiences with dedicated time for reflections on a learner's progress and their post-16 planning.

Developing the effectiveness of our learners as they progress as individuals in the ways described in the four purposes of the curriculum is fundamental. Learners should be given support and be challenged to think about their strengths, areas for improvement, goals and ambitions, ensuring that they are motivated and are setting themselves high standards. It will also allow learners to consider and be supported with planning their post-16 next steps. This can provide an opportunity for schools to provide more tailored and specific careers and work-related experiences (CWRE) within Years 10 and 11.³⁶

In the spring term 2025, the Education Improvement Team delivered a series of 14-16 Leadership conferences to support secondary leadership teams in understanding the new 14-16 learning guidance and the Learner Entitlement; these were attended by over 580 senior leaders across Wales.

4.4 Tackling disadvantage and supporting equity

Our data tells us that large gaps in learner attainment and outcomes between those living in disadvantaged circumstances and their peers remain, making it clear that issues persist. Further work is needed to strengthen the use of evidence so that we can better understand the underlying causes of these gaps, identify which learners require additional support, and monitor outcomes more effectively to evaluate the impact of efforts to remove barriers to learning.

The Welsh Government has commissioned research into the various needs for, and uses of, learner socio-economic disadvantage (SED) information, within the Welsh Government and across our stakeholders. This includes an initial stage of examining current uses of eFSM data as a SED proxy, the other data sources being used, the limitations of eFSM and other data sources in meeting needs and gaps in the data that remain. These findings will inform the next phases of an ongoing project to consider the future role of eFSM as a proxy SED indicator alongside alternative options. Each option will be appraised for its validity and feasibility to ensure that future indicators are robust, meaningful, and fit for purpose for specific needs of this data, including tracking learner attainment and outcomes. A report on phase 1 of this research will be published in December 2025, with phases 2 and 3 anticipated to be completed by the end of 2026.

³⁶ Welsh Government, Hwb, *Careers and work-related experiences (CWRE)*

The Welsh Government's national mission explicitly prioritises tackling the impact of poverty on educational outcomes. Key initiatives include:

- Pupil Development Grant (PDG): Provides targeted funding to schools to support learners experiencing disadvantage. In 2025/26, funding of £128m was allocated to support interventions such as one-to-one tuition, family engagement, and enrichment activities.
- The School Essentials Grant (SEG): Provides assistance to many low-income families across Wales, helping to ease the financial pressure of purchasing school uniforms and equipment. £13.1m has been made available for the SEG for 2025-26, enabling us to continue funding the grant at the level of £125/£200 per learner.
- Poverty Proofing Pilot: Children North East are supporting six school clusters in Wales to understand the impact of poverty on day-to-day educational experiences; and to eradicate poverty stigma and its impact on attainment.
- Partnership with the Education Endowment Foundation: Provides policy makers and education practitioners with high-quality international evidence to identify and implement ways to break the link between family income and educational achievement.
- Family Engagement Officers (FEOs): An additional £3 million has been allocated in 2025-26 to expand the numbers and activities of FEOs, who work directly with families to address barriers to attendance and learning. This takes our total investment in FEOs to £9.5 million annually.
- Enrichment Funding: £2 million of new funding supports schools to offer cultural, sporting, and creative opportunities that enhance learner engagement.
- Attendance: A renewed focus on improving attendance has led to a drop in persistent absence rates from 37.1% to 33.0% in secondary schools between 2023/24 and 2024/25.

These measures are complemented by learner focus groups and local authority engagement to understand and address barriers to learning.

4.5 The Seren Academy

The Seren Academy supports the brightest learners in Wales from Year 7 to Year 13, regardless of socioeconomic background, to have the ambition, capability, as well as the curiosity, to fulfil their potential and excel in their future educational

goals at the highest level. Seren is committed to a learner-centred approach, providing our brightest learners with a comprehensive hybrid programme designed to foster super-curricular engagement and cultivate independent thought, as well as the critical thinking and problem-solving skills, essential for their future success.

The Seren Academy ignites the learners' curiosity and motivation for their learning, empowers them to make informed choices about their future educational pathways and advances their ability to reach their potential and provide the right support required to enter the university of their choice.

Seren is a key part of the Welsh Government's strategy to raise aspirations and ensure that academic excellence is accessible to all, regardless of background. It complements broader efforts to close the attainment gap and promote equity of opportunity.

4.6 Youth Engagement and Progression Framework

The Youth Engagement and Progression Framework (YEPF) is a targeted approach to reduce the number of young people not in education, employment, or training (NEET). The YEPF, for 11 to 18 year olds, covers early identification of risk of being NEET, brokering appropriate support for young people, monitoring their progression throughout their journey, referring them to the right provision, and helping them develop their employability skills so they're able to take up employment opportunities. A range of partners are responsible for delivering aspects of the YEPF, so there is shared accountability for its delivery. Since 2022 the identification and support for children at risk of youth homelessness has been brought within the scope of the YEPF (there is an overlap between the warning signs of risk of NEET and risk of youth homelessness).

In this Senedd term, we have published resources to clarify and improve the delivery of the YEPF, including case studies which are available on Hwb. We also commissioned Estyn to carry out a review of the lead worker role, which highlighted how lead workers play a pivotal role in the Framework, by helping young people overcome barriers and access progression opportunities.

The YEPF complements the Young Person's Guarantee (YPG), for ages 16 to 24. The YEPF and YPG jointly provide a line of sight to support young people throughout their education journey and beyond until they move into employment or self-employment. They both contribute towards our national

milestone³⁷ of at least 90% of 16-24 year olds being in education, employment and training by 2050.

4.7 School and local authority funding

We recognise the significant pressures schools and local authorities are under and appreciate the great efforts of the workforce as they continue to operate in such challenging circumstances. The Welsh Government provides funding to local authorities to support their funding of pre-16 provision in schools in Wales mainly through the local government revenue settlement. The settlement is not ring-fenced; the funding allocated to each authority is available to the authority to spend as it sees fit across the range of services for which it is responsible, including schools. This is in line with the Welsh Government's policy that local authorities are best placed to judge local needs and circumstances and to fund schools accordingly.

We have prioritised investment to local authorities, just as we have in previous years, by providing an increase of £262m to the local government settlement in 2025-26, a like for like basis uplift of 4.5%. This recognises the powerful points that local authority partners and our schools have made around pressures to deliver upon the statutory responsibility for ALN and wider education provision. The 4.5% increase to the local government settlement for 2025-26, builds on previous increases of 9.4% in 2022-23, 7.9% in 2023-24, and 3.3% in 2024-25.

The local authority budgeted expenditure on schools for 2025-26 was published on 3 July. It shows that schools expenditure for 2025-26 is budgeted to be £3,870 million, an increase of 7.8% over the previous year. Schools expenditure per pupil is budgeted to be £8,616, a year-on-year increase of 8.7% or £690. The budget per pupil can be broken down into £6,902 per pupil delegated to schools and £1,714 per pupil retained for centrally funded school services.

In addition to the un-hypothecated funding through the local government settlement, hypothecated funding is provided for education through grants. In 2025-26, over £402m is being provided through the Local Authority Education Grant to help local authorities, schools and settings support our learners. This does not include funding which is also being provided for demand-led schemes, including UPFSM and School Essentials Grant, which will provide a further £126m.

Through additional in-year funding in 2024-25 and additional funding allocated when setting the 2025-26 Budget, the education sector is benefitting from an extra £262.5m, with schools, colleges and other settings receiving funding to help

³⁷ Welsh Government, *National indicators and national milestones for Wales*.

meet the needs of learners across Wales. This is made up of £151m additional funding for 2024-25 and £111.5m allocated in the 2025-26 Final Budget.

The BEL tables 2026-27 will be published on 3 November 2025.

4.8 Workforce capacity

The CYPE committee heard evidence around Teacher Recruitment and Retention at its meeting on 17 September.³⁸

Taken together, these reforms and policy strands demonstrate a coherent, system-wide commitment to raising standards tackling disadvantage, and supporting every learner to achieve their potential. Their success depends not only on curriculum, ALN, qualifications, and equity-focused reforms, but also on sustained investment and the capacity of a skilled, confident workforce. With strong foundations and a focus on supporting staff well-being and professional growth, we are determined to build an ambitious, inclusive, and resilient education system that delivers both excellence and fairness for learners across Wales.

³⁸ Children, Young People and Education Committee (17 September 2025), *Welsh Government paper - Teacher Recruitment and Retention*

Annex A – Overview of Key Stage 4 interim measures

The Key Stage 4 interim measures were introduced in 2019, as a move towards future reporting arrangements that would align with our evaluation and improvement ambitions and the ethos of Curriculum for Wales.³⁹

The five headline measures are all points scores, based on a system that derives points for individual qualification awards dependent on level, size and grade awarded. These are:

- Capped 9 points score - average of the scores for individual learners in the cohort, capped at a volume of nine GCSEs or equivalent qualifications, with requirements for a GCSE in each of a literacy, numeracy and science subject.
- Literacy points score – average of the scores for individual learners in the cohort for an award in English language, Welsh first language, English literature or Welsh literature GCSEs.
- Numeracy points score – average of the scores for individual learners in the cohort for an award in Mathematics or Mathematics – numeracy GCSEs.
- Science points score – average of the scores for individual learners in the cohort for an award in Biology, Chemistry, Physics, Science (double award), Applied science (double award) or Applied science (single award).
- Skills Challenge Certificate points score – average of the scores for individual learners in the cohort for an award in the Skills Challenge Certificate (Foundation or National Level).

Points are allocated for GCSE grades as follows:

- A*: 58
- A: 52
- B: 46
- C: 40
- D: 34
- E: 28
- F: 22
- G: 16

For the Literacy, Numeracy and Science indicators, the highest average points score possible is 58 points should every pupil achieve an A* grade. The lowest average points score is 16 points should every pupil achieve a G grade. Note that these figures are average scores of all pupils across Wales, and some pupils will be performing above this level, and some will be performing below this level. The

³⁹ Welsh Government (June 2019), *Interim Key Stage 4 School Performance Arrangements: Measures and Analyses*

figure is an average of all pupils across Wales and does not indicate the range or distribution of scores within the cohort.

Points allocation for the Skills Challenge Certificate varies slightly from GCSE grade points scores: National Level 2 is graded A* to C and is converted into the same point scores as the subject indicators, with an A* as 58, an A as 52 and so on. The Foundation Level 1 is graded as Pass* and Pass, converted into a point score of 31 and 22. Caution should be taken when comparing this indicator to the three subject performance indicators, which have differing methods of assessment. The SCC focuses more on course work completed throughout the academic year rather than a final exam at the end of the year/term.

It is worth noting this in the context of a steady drop in entries for the award over the past six years (27,544 entries in 2018/19 increasing to 28,377 entries in 2019/20 before declining to 24,848 entries in 2023/24 and 22,695 entries in 2024/25). The Welsh Baccalaureate as an aggregated qualification is no longer available to new learners. The SCC continues to be available as a standalone qualification for learners starting Year 10 in 2025 and 2026. From September 2027, the SCC will be replaced by the Skills Suite, which is being introduced as part of the new National Qualifications for 14 to 16-year-olds.

Enabling a self-improving system – a collaborative model between schools, Local Authorities (LAs) and Welsh Government – Draft guidance (October 2024)

1 Vision – a collaborative school, local and national system

Our vision is for all learners in Wales to reach their full potential within an education system which values the unique contribution of every learner on their 3-16 journey and beyond.

Our vision is to develop local improvement communities of schools in every part of Wales where school leaders and school staff:

- have agency over their own development, working in partnership with other colleagues, schools and the LA, whilst contributing to a shared local and national improvement agenda;
- belong, and contribute to an open, inclusive and supportive environment that supports and enables the improvement of all schools, focused on continuous improvement in educational outcomes for our young people;
- have a shared moral purpose for the progress of all learners within a local area.

Our expectation is that all schools will be operating as part of local improvement communities working with other schools, both horizontally and vertically, to undertake effective peer review, evaluation and improvement. Schools should work together, in a spirit of reciprocity, inviting and welcoming peer scrutiny, support and challenge and supporting each other, in partnership with the LA, with their improvement priorities.

Highly effective self-evaluation through learner focused, evidenced-informed and enquiry-based peer review, will provide an authentic, dependable and comprehensive understanding of local improvement priorities and outcomes for local authorities and, in turn, national government. This strengthens school agency and ownership of their improvement agenda whilst enabling LAs to fulfil their own statutory responsibilities (Annex A includes key legal and policy context).

LAs, working in partnership with schools, are enabled to develop an informed approach to establishing and aligning improvement strategies and where needed commissioning local or national school-to-school support and professional learning.

Welsh Government will provide strong national leadership by setting out a small number of clearly defined and focused national improvement priorities, informed by their dialogue with local authorities and local improvement communities. This dialogue will both drive local action and inform national provision by aggregating local information and intelligence. National support will be provided where this approach makes best use of resources and secures greatest impact.

Collective Responsibility

Fundamental to achieving the vision is enabling a culture of collective responsibility amongst schools and partners. All schools, in partnership with their LA, should act in the best interests of **all** local learners as they progress along the 3-16 continuum (and beyond) - collectively addressing local improvement needs.

The responsibility for the journey of the learner along their learning continuum should be equally owned by all the organisations involved; this means moving beyond a model focused on transition points alone to a culture where a deep, shared vision for what we want for all learners within the local community is enacted.

Whilst school leaders and their governing bodies will remain accountable for improving learning within their own school, they should also feel collectively responsible for improving learning in other schools/settings. The LA should work in partnership with school leaders to build capacity, skills and expertise across schools within a culture where the whole local system has a commitment to the shared goal of raising standards and improving the educational experience of all learners.

LAs should apply the same principle across LA boundaries in its work with other LAs. These partnerships should be rooted in the notion of collective responsibility and be aimed at improving the standards, provision and experience for all learners in Wales.

Collaborative improvement

Purposeful *collaborative improvement* should be viewed as the most effective way to enable school leaders and school staff have agency for their own improvement; this should be focused on improving learning and outcomes for **all** learners.

Enabling leaders and practitioners to see and understand learning and leadership in action in other institutions will inform their own understanding of progression, expectations and leading improvement. Collaborative arrangements can support shared leadership capacity and thus schools will benefit from shared strategic thinking, planning, and expertise.

Collaborative improvement enables greater professional agency at all levels; it contributes to educational improvement and professional growth; it enhances teaching and leadership practice by enriching professional learning and dialogue. *Collaborative improvement* can nurture a shift to a more enquiry-based improvement culture within and between schools.

When designing and delivering any local support, there should be a focus on supporting all schools to improve, not just those causing the greatest concern.

2 A school improvement model - school leaders and school staff have agency over their own improvement

Our overall aim is to enable all learners to maximise their progress and therefore to improve educational outcomes in Wales by:

- i Improving the quality of leadership within and across all schools;
- ii Improving the quality of learning and teaching within and across all schools;
- iii Creating an inclusive school environment focused on meeting the diverse needs of learners - tackling barriers to learning in a long-term, integrated way.

A summary of our model:

- As the starting point, schools should lead their own self-evaluation and improvement planning process in an open, iterative way (rather than as a one-off event); this should be a process which is supported by other schools and the local authority.
- All schools will be part of a **vertical collaborative improvement** model (3-16 and beyond) and a **horizontal collaborative improvement** model (e.g. secondary to secondary) with clear **expectations for deep and purposeful collaboration** (further details below). This will enable leaders, teachers and other practitioners to engage with learning and leadership in other schools.
- Local improvement needs are consolidated within a *local improvement community* (see definition below) which enables LAs and school leaders to facilitate local school-to-school support and commission, when required, wider local or national support and professional learning.
- WGs Education Improvement Team will enable a deeper national understanding of local need and facilitate nationally consistent support to be developed when required.

The above elements at every level need to coexist and complement each other for the self-improving system to succeed.

2.1 Role of the individual school

School leaders and their governing bodies will remain accountable for improving learning within their own school, creating an inclusive school ethos focused on meeting the diverse needs of learners. All schools should have honest, robust, evidence-informed self-evaluation arrangements in place, building on the range of information and evidence available, as part of their strategic improvement process.

Schools will focus on some key questions as a starting point for their improvement activities:

1. Are learners progressing in the ways described in the principles of progression, supporting them to develop towards the four purposes?
2. Are all learners' needs being met so that they can maximise their progression and do we have high expectations for all?
3. To what extent is high quality teaching and assessment having an impact on learning, and maximising learner progress?

4. Are leaders communicating an ambitious vision for all learners, successfully securing improvement and creating a professional collaborative culture?

A range of information and evidence will be needed to inform a school's evaluation around these questions, but no school should tackle these in isolation. In developing their collective understanding of progression and expectations for learning, schools should ensure that practitioners have sufficient support and challenge from within and beyond their own school. Working through an enquiry-focused self-evaluation process within a deep and purposeful collaborative arrangement with other schools can allow leaders and practitioners to understand learner progress.

There will also be additional support available to local areas as they develop their approaches to progression and assessment through the national curriculum support programme.

2.2 “Vertical Collaboration”

Schools should work collaboratively within their locality to ensure that all learners are able to progress along the 3-16 continuum and beyond.

Schools and LAs should consider opportunities for collective solutions to tackle local issues. Long-term strategies should be put in place to address those local 3-16 challenges, tackling barriers to learning at the earliest stage possible (including disadvantage, ALN, behaviour and attendance). Developing a shared understanding of poverty, its impact on learners in the locality and the resources available locally to help meet these challenges, would also be a key component of this collaborative approach.

Vertical collaboration is also fundamental in ensuring an inclusive and coherent curriculum and facilitating progression for all learners, particularly at key transition points. Central to this, will be the development of a shared understanding of progression and expectation for learning along the 3-16 continuum.

2.3 “Horizontal collaboration”

Schools should work in partnership to develop collaborative evaluation and improvement planning with schools which have learners in the same age range (for example a secondary school working with other secondary schools). Central to this form of *collaborative improvement* is the development of a shared understanding of progression and expectations for learning which underpins effective self-evaluation and enables precise improvement priorities to be identified and implemented. (Please note that horizontal collaboration may need to operate across LAs to enable similar settings to work within the same sector e.g. Welsh-medium, faith, special, PRU/EOTAS).

2.4 Expectations for deep and purposeful collaboration

Schools and LAs will need to create an open culture of collaborative enquiry, innovation and exploration, to develop an evidence-informed understanding of improvement priorities, ensuring that those priorities are sufficiently refined and specific.

To enable this, we would expect school collaboratives, within a trusting and supportive environment, to:

- share with each other the qualitative and quantitative information and evidence relating to their individual improvement journey;
- share the latest evidence-informed practice, research and information;
- facilitate and participate in active professional learning where leaders and practitioners from other schools, along with the LA, can provide effective and reciprocal support and challenge.

This will lead to effective triangulation by allowing for purposeful professional dialogue around first-hand evidence of learning and leadership within a wider range of evidence and information. The above will also enable the LA to understand the underlying barriers to learning so that the wider services of the authority can support schools to tackle those barriers.

Please note:

We recognise that local areas and collaboratives will be at different stages of maturity in developing this type of deep and purposeful collaboration. To support the system with progressing this agenda, we will work in partnership with schools and LAs to develop a maturity matrix which will set out the different stages of development which local areas may wish to consider as they develop effective collaborative working.

We also recognise that developing this type of collaborative relationship may be more challenging in certain local areas and communities, for example for small schools working across rural communities. We are committed to continue working with those local areas to understand and support them to overcome any barriers to supporting this type of deep and purposeful collaboration for all schools and we will be publicising and sharing examples of successful collaboration across Wales.

2.5 LA/Local improvement community

The *local improvement community* will bring together the school collaboratives in a local area to consolidate local improvement intelligence, to facilitate ongoing collaboration on key issues, and focus on a shared local improvement agenda.

In partnership with local school/system leaders, LAs will plan and implement their strategies for improvement according to the needs of the local system and local communities as aggregated via the *local improvement community*. This would include consideration of workforce, school capacity and resources to meet the needs of ALN learners within the local population. Working strategically with school leaders and professionals around key priorities, which are aimed at improving learning, should facilitate opportunities for building and sharing capacity.

This process should also allow LAs to develop a clear understanding of where they might require additional support and capacity. It will also help LAs to identify areas of strength for sharing with others beyond their own geographical area and consolidate

and consider local improvement priorities as part of their own self-evaluation processes. See *Annex B and C for an illustrative example*.

2.6 Role of Welsh Government

Welsh Government will create a small new national Education Improvement Team with expert capacity seconded in from the school and local authority sector to support regular dialogue with local authorities and local improvement communities. This dialogue will help to support the development of a culture of self-improvement and connect the discussion around national and local priorities for improvement. It will also help to ensure sharing of learning and evidence-informed practice between local authorities and schools across Wales.

As illustrated in Annex B, this approach should allow WG to have a better understanding of school and local priorities which can inform, and ensure better alignment with, our national priorities.

Collaborative improvement at all levels of the system will lead to greater national coherence and ultimately provide a better foundation for raising educational standards for the benefits of all learners.

3 Implications of the new model

3.1 External support arrangements - role of improvement partner/school improvement advisor

The role of Improvement Partner or School Improvement Advisor, will remain important within the local system, although the role will need to evolve. We expect this role to focus on working with collaborative groups (vertical and horizontal) and to play a facilitative and supportive role in developing effective school-to-school *collaborative improvement*.

In supporting the development of collaborative working, Improvement Partners or School Improvement Advisors will be integrated into the *collaborative improvement* infrastructure so that they can draw on key themes and emerging issues. Through this, they will develop a fuller understanding of local priorities and be able to facilitate collective solutions / improvements (drawing on expertise from outside the locality where required). They can also connect national priorities with local needs and broker effective evidence informed research and learning that will enhance and support identified school improvement priorities.

Please note: WG will provide national professional learning to support those involved in school improvement (school leaders and LA staff) to develop their approach to operating as advisors and facilitators, in line with this model of supported *collaborative improvement*. Once established, it is envisaged that this professional learning should be undertaken by:

- all LA staff involved in supporting schools with self-evaluation and improvement;
- at least one member of the senior leadership team in each secondary school;
- at least one member of the leadership teams across the cluster / collaborative partnership of primary schools (special/PRUs/EOTAS)

3.2 Schools Causing Concern

The School Standards and Organisation (Wales) Act 2013 clarifies the law in relation to intervention in schools causing concern.

Schools Causing Concern, in enhanced monitoring or in an Estyn category should be included as part of the collaborative infrastructure. However, the LA may need to review their model of engagement in light of the capacity required to deal with the specific issues within that school.

The responsibility for supporting a school in category or causing concern sits with the LA. The open and collaborative culture should enable the LA with early identification of schools with particular difficulties. The collaborative model should be agile and responsive, allowing for schools in more difficulties to benefit from more targeted support.

A case by case approach will be needed and the LA should reflect on the distinct role of the Improvement Partner to broker bespoke support to secure rapid but sustainable

improvement in that school. Leadership capacity and specialism can be utilised from across the school collaboratives, so that no school is left behind.

4 Partnership working between local authorities

We expect that all local authorities will work in partnership with other local authorities to deliver school improvement support. These partnerships will be agreed on a voluntary basis between local authorities.

There are broadly two types of partnership we expect to see between local authorities:

- The first will be partnerships between local authorities coming together to deliver support services to schools to make best use of resources. The key argument for delivering services in this way is likely to be economies of scale and the ability to access a wider pool of more specialist skills and resources. It is likely to be particularly important in ensuring local authorities can provide support to schools in all areas of the curriculum, including Welsh language support. These partnerships will also allow for collaborative working between schools to cross local authority boundaries which may be important to meet the needs of their provision and their learners and communities (e.g. Welsh-medium, faith, special schools, PRU/EOTAS). This type of partnership working between local authorities may also be important in brokering bespoke professional learning support for schools or drawing down the national professional learning offer. This type of operational partnership may also involve sharing of staff to improve capacity and achieve efficiencies. That might include school-based staff and expertise being deployed and used across more than one local authority; specific expertise being employed by one local authority but being used to support schools in another local authority and/or functions which local authorities decide are best done on a joint basis.

- The second type of partnerships between local authorities might be more specific and time limited and be aimed more at sharing learning, expertise and school-based capacity across local authorities on key issues and topics

5 Role of national functions

Welsh Government is committed to providing national leadership for the education system in Wales, playing a key role in leading a self-improving education system.

We are committed to doing this in a number of ways including:

- Providing clear and succinct policy direction to enable coherence across the system.
- Having a focused set of foundational priorities and ensuring the right support for those priorities to be delivered across the system.
- Having clear oversight and ensuring the interconnectedness of the system allowing local intelligence to inform national developments.
- Providing national support where required to make best use of resources and secure greatest impact.

In considering the national functions, the Welsh Government remains committed to the following principles:

- **Subsidiarity** - ensuring that we only do things on a national basis where there is evidence that this is the most appropriate solution
- **Collaboration & Professional Agency** – as the cornerstone of our way of working; we are committed to ensuring the professional agency of our schools and partners in everything we do.

Welsh Government has been engaged in defining and refining the roles and responsibilities across the system, and this guidance is a key step forward in providing clarity on expectations for local authorities and schools. The revised School Improvement guidance will provide further detail and clarity on the national functions.

We have agreed to establish national support programmes (NSPs) to provide intense targeted support to address identified improvement priorities and ensure consistent implementation of reforms. The first NSP will provide further support around the issues of curriculum design, assessment and progression. Welsh Government will work with LAs over the Autumn term to construct and deliver these programmes.

Welsh Government will also reduce and streamline national professional learning and focus on statutory and core priority areas. We will work with the Education Improvement Team and LAs to identify priorities for nationally developed and delivered professional learning. We will also work on a national basis to develop professional learning that can be delivered locally through LAs.

It is proposed that national professional learning and leadership support will be **developed and delivered** in these areas:

- Professional learning to develop enquiry and research skills to improve reflective practice (building on the smaller-scale NPEP project currently delivered in partnership between regions and universities);
- Leadership professional learning (including NPQH and schools as learning organisations);
- Coaching and Mentoring;
- Support for Welsh-medium practitioners (subject specific and pedagogical);

- Support for improving teaching practice / pedagogy;
- Professional learning in relation to Government priorities e.g. professional learning for new GCSE qualifications, anti-racism, mental health and wellbeing;
- Professional learning for school improvement advisers.

It is proposed that the **development** of professional learning and leadership support in the following areas will also be undertaken on a national basis to ensure national consistency and to avoid duplication of effort – however, **delivery will involve LAs through a cascade model:**

- Professional learning for Teaching Assistants;
- Support for improving the teaching of Welsh in English-medium schools;
- National professional learning for early career teachers, including the induction programme for NQTs.

LAs should set out in their planning template how they will ensure capacity within their local system to support delivery of these programmes alongside other professional learning that the LAs are planning on providing for schools.

6 Roles and responsibilities

Schools should:

- Have a shared vision for how they should improve; a vision that has professional agency, *collaborative improvement* and collective responsibility at its core; a vision that carefully considers the role of the wider community partners in supporting the educational outcomes of **all** its learners.
- Be participating in purposeful vertical and horizontal collaboration focused on improving learning. All schools should be prepared to support and be supported, sharing capacity efficiently and sustainably with other schools to support improvement needs.
- Work with others to build their internal school improvement capacity, expertise and specialism, making effective use of INSET days and the professional learning grant.
- Secure a culture of high expectations, within a shared understanding of expectations for learning, well-understood by all staff and stakeholders, recognising that this can only truly be achieved through effective collaborative enquiry.
- Welcome external peer perspectives and local authority support on their learning and leadership processes to improve the quality and accuracy of their self-evaluation. This, in turn, leads to the identification of precise improvement priorities and a clear plan for securing sustainable change.
- Tackle barriers to learning collectively, working with other schools, parents and community partners/services (through vertical collaboration) to identify and implement long term solutions to support the progress of all learners in their local area.

Governing bodies should:

- Enable their leaders and practitioners to support collaborative improvement by actively participating within collaborative arrangements and where appropriate, supporting school leaders to act as local system leaders.
- Empowers their school to operate within an open, supporting culture where support/learning is provided and received where appropriate.
- Consider their own arrangements for working with other governing bodies to support collective responsibility and *collaborative improvement*.

LAs working with schools through Local Improvement Communities should:

- Agree a collective vision with school leaders focused on how to improve learning locally - a vision that has *collaborative improvement* and *collective responsibility* at its core.
- Develop a holistic local education system to meet local need – taking into consideration their responsibilities in relation to curriculum, equity, ALN, school improvement, professional learning, Welsh language and funding.
- Operate a *collaborative improvement* infrastructure which ensures that all their schools can participate in purposeful vertical and horizontal collaborative work focused on improving learning.
- Enable an open, trusting collaborative culture that ensures first-hand evidence of learning and leadership are shared between schools and with the Local Authority. This enables a deep and honest understanding of standards within their schools along with an authentic, collective understanding of local priorities.
- Ensure that school improvement capacity exists predominantly within schools by ensuring an appropriate balance of school-based expertise and secondments with any permanent LA based specialist resource. LA based specialists seek to develop and share school-based expertise and capacity within the local system (and beyond) - learning with and from the system.
- Works in partnership with other LAs to share and learn from others, and to access support/resources at the most efficient level to secure sustainable local improvement within their schools
- Ensure that local improvement needs are consolidated within a *local improvement community* which enables LAs to facilitate local school-to-school support and commission, when required, wider local or national support and professional learning.

Welsh Government should:

- Facilitate regular in-depth professional dialogue between the Education Improvement Team and local areas - ensuring a deep and reciprocal understanding of local and national improvement needs.
- Ensure clarity is provided around national improvement priorities, along with consistent support in identified priority areas. *Welsh Government has agreed to establish national support programmes (NSPs) to provide intense targeted support to address identified improvement priorities and ensure consistent implementation of reforms. The first NSP will provide further support around the issues of curriculum design, assessment and progression. Welsh Government will work with LAs over the Autumn term to construct and deliver these programmes.*

- Reduce and streamline national professional learning and focus on statutory and core priority areas. *Welsh Government will continue to work with LAs over the Autumn term to agree the professional learning that will be developed and delivered nationally and/or locally.*

7 Policy Objectives

The following are the Welsh Government policy objectives for the creation of a local improvement system by March 2026, which are aligned with the findings of the Review.

Policy Objectives - by March 2026:

- All schools in Wales are participating in purposeful vertical **and** horizontal collaborative approaches and structures focused on improving learning.
- All local authorities are working in partnership with their schools, actively using this new school-based collaborative approach to know their schools and improve educational standards in their area, in the context of their responsibilities in relation to curriculum, equity, ALN, and school improvement, Welsh language, professional learning and funding.
- School improvement capacity exists predominantly within schools by ensuring an appropriate balance of school-based expertise, secondments and any permanent LA based specialist resource.
- All local authorities have clear partnership arrangements which are focused on improving learning through their collaborative local improvement system **and** which represent value for money for resources.
- All local authorities have a robust transition plan taking them to summer 2025, along with a clear long-term commitment to meet the policy objectives by March 2026.

The template (Doc 1) is structured around these policy objectives.

Annex A - Legal and policy Context

While it is not possible to summarise the entire education context here, the activities or processes described in this guidance cannot be delivered by schools and LAs without an understanding of the legal and policy context in which they operate.

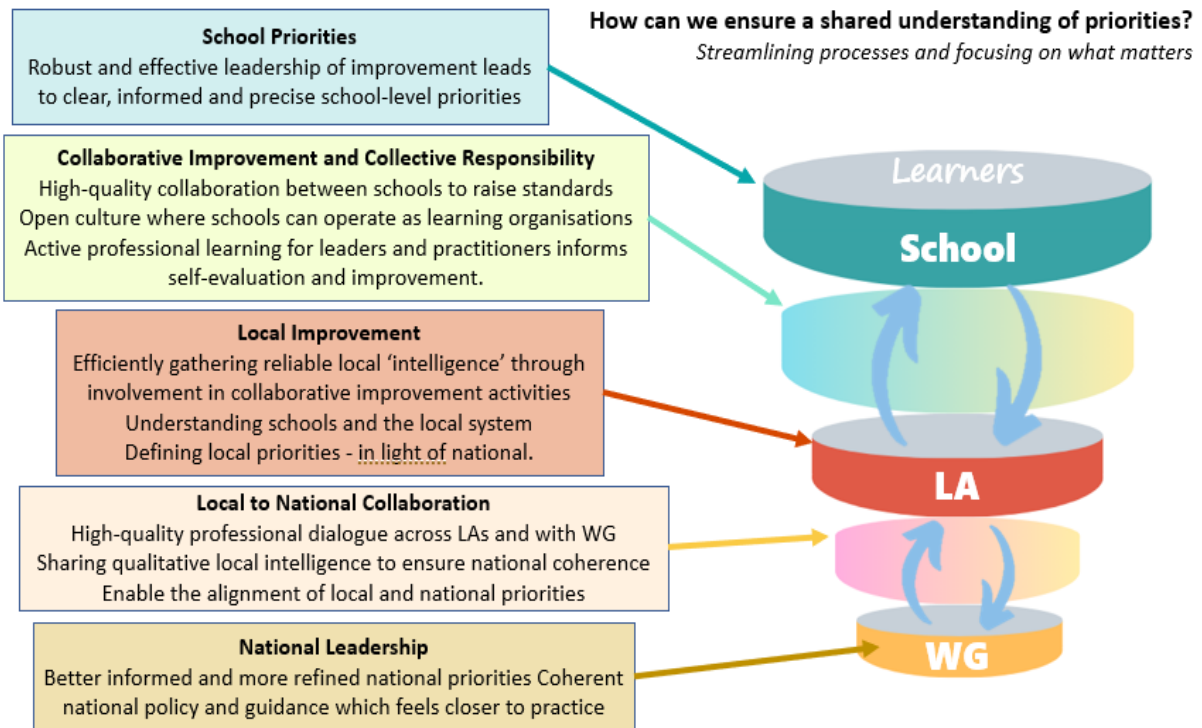
Local authorities have broad duties in respect of education. They have a general duty to maintain relevant maintained schools under section 22 of the '**School Standards and Framework Act 1998**'. They also have a variety of oversight functions, which include:

- a 'general responsibility for education' in their area by contributing 'towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education, and secondary education... are available to meet the needs of the population of their area'. [Section 13, the **Education Act 1996**]
- A duty to promote high standards, and the fulfilment of learning potential, in the exercise of their education functions. [Section 13A, the **Education Act 1996**]

The **School Standards and Organisation (Wales) Act 2013** sets out the legislative requirements and powers available to local authorities and Welsh Ministers for intervening in schools causing concern.

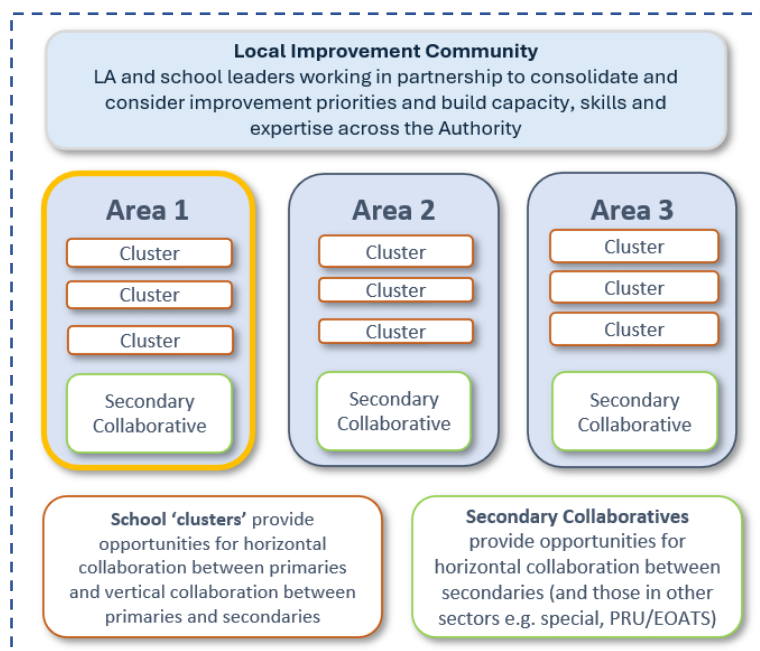
The [Additional Learning Needs and Education Tribunal \(Wales\) Act](#) and the [Additional Learning Needs Code](#) set out the roles, responsibilities and requirements placed upon schools, governing bodies and local authorities for learners with ALN. This guidance will highlight some specific aspects of best practice to support improvement of ALN delivery, and requirements for multiagency collaboration

Annex B: How can we ensure a shared understanding of priorities?

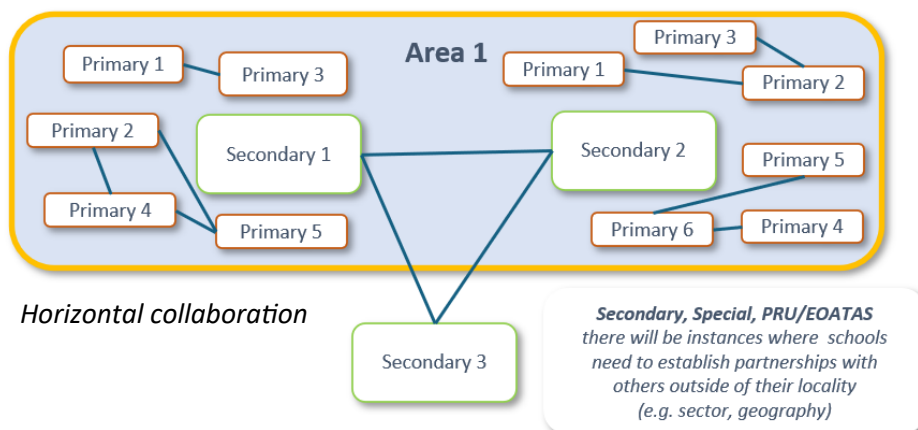


Annex C: How might collaborative arrangements develop within a LA?

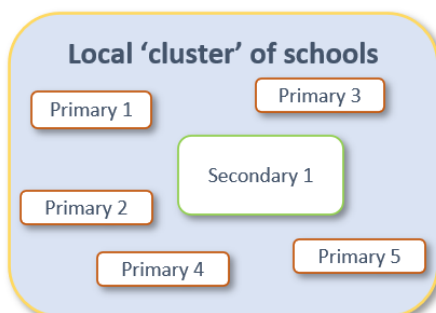
Example



Horizontal collaboration should allow schools with learners of a similar age range to explore learning, leadership and wellbeing together. A key component of this collaborative improvement work will be that leaders and practitioners are given the opportunity to see first-hand evidence beyond their own institution. Collectively, they should consider their expectations for learner progress and attainment, ensuring sufficient stretch and challenge across schools.



Horizontal collaboration



Vertical collaboration should allow schools to work locally. They will focus on local priorities and ensure effective transition for all learners along the 3-16 continuum and to post-16. This work should result in local schools having a clear understanding of any barriers that exist for learners, which they can tackle collectively.

The word 'cluster' is used here for ease of reference, although it is not a term used universally across Wales.

Philip Blaker
Chief Executive
Qualifications Wales

20 October 2025

Re: Implementation of Education Reforms

Dear Philip,

As you are aware over the Sixth Senedd we have been monitoring the implementation of two major education Acts passed in the last Senedd; the Curriculum and Assessment (Wales) Act 2021 and the Additional Learning Needs and Education Tribunal (Wales) Act 2018. Each year the Committee has carried out a check-in, which has involved formal evidence sessions as well as visiting schools in Wales to understand how these reforms are being implemented in practice.

During the Autumn term the Committee is carrying out its fourth and final check-in. As part of this work, we have heard some concerns about the new 'Made for Wales' Geography GCSE, now being taught from this academic year for first awarding in 2027.

We have heard concerns that the specification of WJEC's new GCSE Geography no longer includes plate tectonics or ecosystems in its content. Although there is coverage of this content in the current science specifications, it is through a science lens rather than through a geographic lens. This will mean no (or little) consideration of the human impacts on, and management of, ecosystems, or the human inequality of tectonic impacts and responses to potential hazards.

Tectonics is compulsory content at A Level, both at AS and A2, while ecosystems is an optional unit at A2. Without the prior learning experienced by their peers studying other GCSE specifications, some teachers fear that this puts Welsh learners taking the Made for Wales WJEC GCSE at a disadvantage.

Also we would be keen to know, if there is any intention in Wales of introducing a Natural History GCSE similar to one being developed in England.

We are of course aware of the different roles of Qualifications Wales and WJEC in developing qualifications. We are writing similarly to WJEC as it is their qualification and they have produced the specification, in line with the approval criteria set by Qualifications Wales. We also understand that WJEC's specification was approved by yourselves as the regulator. We are keen to have both your perspectives on this matter.

We would appreciate a response by 28 November. We look forward to receiving your response.

We have copied in the Cabinet Secretary for Education for her information.

Yours sincerely,



Buffy Williams MS

Chair

Children, Young People and Education Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English

Cc: Lynne Neagle MS, Cabinet Secretary for Education

Agenda Item 3.2

Y Pwyllgor Plant, Pobl Ifanc ac Addysg

—
**Children, Young People
and Education Committee**

Ian Morgan
Chief Executive
WJEC

Senedd Cymru

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—
Welsh Parliament

Cardiff Bay, Cardiff, CF99 1SN
SeneddChildren@senedd.wales
senedd.wales/SeneddChildren
0300 200 6565

20 October 2025

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Dear Ian,

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During the Autumn term the Committee is carrying out its fourth and final check-in. As part of this work, we have heard some concerns about the new 'Made for Wales' Music GCSE now being taught from this academic year for first awarding in 2027.

We understand that school staff have been told by the WJEC that the first time learners currently studying towards this GCSE would see a paper in exam format would be when they sit it in June 2027. While practice papers would be available they would be on paper not electronic, as the exam will be. This would mean learners accessing their actual exam using software and hardware they have never used before.

For learners who currently use Chromebooks they will also be using an unknown operating system on a laptop. For some, this could be the first time they have ever used a laptop that is not a Chromebook, which could cause issues. It is also unclear who will be providing the equipment for the exam. If this is down to individual schools, this could cause inconsistencies in the quality of the equipment.

The Committee would be grateful if you can provide some clarification on these important issues. We would appreciate a response by 28 November.



We look forward to receiving your response

We have copied in Qualifications Wales and the Cabinet Secretary for Education for their information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Buffy Williams', enclosed within a hand-drawn oval shape.

Buffy Williams MS

Chair

Children, Young People and Education Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English

Cc: Philip Blaker, Chief Executive, Qualifications Wales

Lynne Neagle MS, Cabinet Secretary for Education

Y Pwyllgor Plant, Pobl Ifanc ac Addysg

Children, Young People and Education Committee

Ian Morgan
Chief Executive
WJEC

20 October 2025

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Tectonics is compulsory content at A Level, both at AS and A2, while ecosystems is an optional unit at A2. Without the prior learning experienced by their peers studying other GCSE specifications, some teachers fear that this puts Welsh learners taking the Made for Wales WJEC GCSE at a disadvantage.

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We are of course aware of the different roles of WJEC and Qualifications Wales in developing qualifications. We are writing similarly to Qualifications Wales as the regulator and because they set the approval criteria and approved the specification. We are keen to have both your perspectives on this matter.

We would appreciate a response by 28 November. We look forward to receiving your response.

We have copied in the Cabinet Secretary for Education for her information.

Yours sincerely,



Buffy Williams MS

Chair
Children, Young People and Education Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English

Cc: Lynne Neagle MS, Cabinet Secretary for Education

Agenda Item 3.4



Carolyn Thomas MS and Buffy Williams MS
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

22nd October 2025

Dear Carolyn and Buffy,

On behalf of NYAS Cymru, I would like to thank you and members of both the Petitions and CYPE Committee for the work that has been completed over this past Senedd term to support care-experienced mothers and end intergenerational care cycles in Wales.

We are writing to you both, as Chairs of the Committees, regarding the recommendations on data collection made in the respective Committee inquiries into 'Support for Care-experienced parents' (March 2023) and 'If not now, then when? Radical reform for care-experienced children and young people' (June 2023).

In both inquiries, we were pleased to see recommendations made to Welsh Government about data collection on all aspects of the care system, and specifically data on the number of children born to care-experienced mothers in Wales and how many of these children remain with their parent/s, placed in foster care or with family members or placed for adoption. Unfortunately, it has now been over two years since these recommendations were made, and we are disappointed that it appears no further progress has been made by Welsh Government to work with local authorities to routinely collect and publish this data in Wales.

NYAS Cymru's Project Unity service provides one-to-one emotional and practical support to care-experienced girls and young women as they try to navigate care and child protection proceedings in relation to their baby, child or children. The service enables and empowers girls and young women to create and sustain a loving family for themselves and their babies and children. The service has been funded through the Sustainable Social Services Third Sector Grant since 2020. From our service, and as highlighted in your inquiries, we know that care-experienced mothers are disproportionately more likely to face social services intervention and/or separation from their children than their non-care-experienced peers, and this can often be driven from assumptions of a mothers parenting ability because she herself spent time in care as a child.

With there being no national data on this issue, it becomes challenging to explore this issue further and ensure that the right policy and practice is in place to support both young mothers and local authorities working with them. At the start of this Senedd term, Welsh Government had made a commitment to improving services for care-experienced children and young people and set out of number of reform measures to achieve this. The previous First Minister, Mark Drakeford MS, also made a commitment to reducing the number of children entering the care system in Wales.

We believe having data on the number of children born to care-experienced mothers and their interactions with social services is a vital part of fulfilling these commitments and working to end intergenerational cycles of care and discrimination in Wales. We would therefore like to please ask you both, as Chairs of the Committees and in relation to the inquiries mentioned, if you are able to write to Welsh Government to get an update on their progress of this work and what steps have

been, and are going to be taken, to work with local authorities to routinely collect and publish this data before the 2026 Elections.

We would welcome any opportunity to meet with you both to discuss this further at a date and time of your convenience. Once again, we thank you for your and the Committee's continued support and for championing the rights and outcomes of care-experienced mothers and their babies. We look forward to hearing from you.

Best regards,



Sharon Lovell MBE
Chief Executive
NYAS Cymru

Agenda Item 3.5

Y Pwyllgor Deisebau

Petitions Committee

Peter Fox MS, Chair, Health and Social Care Committee

Buffy Williams MS, Chair, Children, Young People and Education Committee

23 October 2025

Dear Peter and Buffy,

Petition P-06-1518 Provide more timely and accessible mental health support for children under 10, including by referral to Child and Adolescent Mental Health Services (CAMHS)

The Petitions Committee met on 6 October and considered the above petition, submitted by Lisa White.

Members thanked the petitioner for raising a very important issue that has received much cross-party attention, but agreed that the Health and Social Care Committee and the Children, Young People and Education Committee were best placed to scrutinise the Welsh Government's Mental Health and Wellbeing Strategy. On that basis, the Committee decided to close the petition and to highlight it with you as Chairs of those Committees.

The full details of the Committee's consideration of the petition, including the correspondence and the actions agreed by the Committee can be found here: [P-06-1518 Provide more timely and accessible mental health support for children under 10, including by referral to Child and Adolescent Mental Health Services \(CAMHS\)](#)

I would be grateful if you could send any response by e-mail to the clerking team at petitions@senedd.wales.

Yours sincerely



Carolyn Thomas MS
Chair

Senedd Cymru

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0300 200 6565

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Health and Social Care Committee

Abigail Harris

Chief Executive, Swansea Bay University Health Board

Alex Howells

Chief Executive, HEIW

23 October 2025

Dear Ms Harris, Ms Howells

We have been contacted by the March 2023 cohort of Adult Nursing students at Swansea University, who tell us that no Band 5 adult nursing positions have been made available to newly qualified nurses within Swansea Bay University Health Board through the recent NHS Wales Streamlining process. As a result, they tell us that up to seventy students are facing unemployment following completion of their nursing training, which has been funded by NHS Wales under the Welsh Government's bursary scheme. They also say there are limited vacancies in the surrounding health board areas, making those positions highly competitive.

The students who have contacted us are, understandably, extremely concerned about their future and their ability to work within the Welsh NHS workforce. Many of them live locally to Swansea and have trained within the health board area but now find that they are unable to access employment locally. They are also worried about the implications for their bursary conditions which, they tell us, require employment within three months of qualification and for that employment to be within Wales for a minimum of two years post-qualification.

If the above position is correct, it would be extremely concerning not just for the 2023 cohort who are currently facing an uncertain future, but for nursing students more broadly as well as the wider workforce. It would also highlight significant deficiencies in the workforce planning and staff recruitment and retention processes.

As a Committee, we are well aware of the staffing shortages and working pressures facing the NHS workforce in Wales, and we have heard, as part of previous inquiries, of the efforts by HEIW and health boards to both recruit new staff and to retain existing staff. A decision not to offer entry-level nursing posts to newly qualified students would seem to fly in the face of this.

In light of this, and as a matter of urgency, can you:

1. confirm the position as regards Band 5 nursing vacancies for the 2023 training cohort – are any such vacancies available in Swansea Bay University Health Board; do you intend to make any vacancies available in the near future and, if so, how many;
2. outline what advice has or will be made available to the current cohort on next steps and the options that are available to them;
3. confirm whether this position is similar across other health boards in Wales, not just in relation to nursing but as regards wider healthcare roles; and
4. outline what advice has or will be given to the current cohort about the position regarding their bursary funding if they are unable to meet the terms of their bursary agreement due to a lack of suitable posts being made available by the health board.

A copy of this letter goes to the Cabinet Secretary for Health and Social Care, the Chair of the Children, Young People and Education Committee, and the Executive Director of RCN Wales.

I look forward to your swift response.

Yours sincerely



Peter Fox MS
Chair, Health and Social Care Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.

Agenda Item 3.7

Y Pwyllgor Plant, Pobl Ifanc ac Addysg

—
**Children, Young People
and Education Committee**

Ken Skates MS

Cabinet Secretary for Transport and North Wales

Cc. Lynne Neagle MS

Cabinet Secretary for Education

24 October 2025

Re: Recommendation 9 of 'Routes into post-16 education and training' report

Dear Ken,

As you may be aware, the Children, Young People and Education Committee is preparing to publish its report on its inquiry 'Routes into post-16 education and training'. The report is scheduled to be published on Wednesday 12 November.

We signed off the final report during our Committee meeting yesterday. One of our recommendations relates to the Welsh Government's pilot £1 maximum single fare/£3 maximum daily fare bus travel for young people. We have already sent you an early draft of the summary of the evidence we received about transport as a barrier to post-16 education and training, which informed that recommendation.

When we first drafted the recommendation we had no reason to believe that the Welsh Government was preparing to carry out an independent evaluation of the pilot. Your announcement in Plenary on 7 October confirming that an independent evaluation would be carried out has changed the urgency of our recommendation to you.

In order to give you every possible chance to consider the recommendation and shape the evaluation accordingly, we have agreed to share with you the recommendation itself and the narrative immediately preceding it ahead of the publication of the report on 12 November:

"... The Welsh Government is taking action in this area, by piloting a cap of £1 single bus fares for young people. Of course, £1 bus fares won't help learners who have to take the train. Or learners who live or study in areas with limited bus

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access. But we welcome the pilot as a way to reduce the financial burden of transport for many young people. As a relatively high-cost policy, it will be important for the next Welsh Government to consider the impact of the pilot and to ascertain whether it has made a tangible difference to young people, including in relation to the accessibility of education and training institutions. We therefore welcome the Cabinet Secretary for Transport and North Wales' commitment to commissioning an independent evaluation of the pilot, which we believe must consider explicitly the impact of the scheme on access to post-16 education and training.

Recommendation 9: *The Welsh Government should explicitly include the impact on young people's access to post-16 education and training amongst its terms of reference in the forthcoming independent evaluation of its pilot of £1 maximum single fare/£3 maximum daily fare bus travel for young people."*

The full report includes a more detailed narrative and the corresponding background sections summarising the evidence we received.

I hope that this is useful to you as work on the evaluation continues. We welcome a response to the recommendation at the usual time following the publication of the report.

Yours sincerely,



Buffy Williams MS

Chair

Children, Young People and Education Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English

Agenda Item 3.8

Y Pwyllgor Plant, Pobl Ifanc ac Addysg

Children, Young People and Education Committee

Jeremy Miles MS

Cabinet Secretary for Health and Social Care

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28 October 2025

Quality Statement for Children's Health and the Welsh Government Draft Budget 2026/27

Dear Jeremy,

As you know, we have always taken a keen interest in how the Welsh Government's budget can help deliver improvements in children and young people's lives. Every year, we have commented on the lack of a published Children's Rights Impact Assessment on the draft budget. Last year we called for the trialling of a CRIA being published on the allocations for the Health MEG in the 2026/27 Draft Budget. We were disappointed this was rejected.

We also asked for more information on the Quality Statement for children's health and the newly established clinical lead for child health. As part of this, we also requested more detail on how these structures will enable the Welsh Government to monitor spending, measure healthcare outcomes for children (beyond just outputs) and hold health boards accountable. In response, you said the Integrated Quality Statement on Children's Health will set out expectations to Health Boards, with the support of the National Strategic Clinical Network for Child Health. You said that monitoring would be done through the usual health board quarterly reporting mechanisms and through IQPD meetings.

To help us prepare for our budget scrutiny, it would be helpful to have an update on this work. In particular, can you share the Integrated Quality Statement with us?

We would appreciate receiving a response by 7 November.

I am copying this letter to Peter Fox MS, Chair, Health and Social Care Committee.

Yours sincerely,



Buffy Williams MS

Chair

Children, Young People and Education Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English

Buffy Williams MS
Welsh Parliament
Cardiff Bay
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28 October 2025

Dear Ms Williams,

As Chair of the Children, Young People and Education Committee, the Office for National Statistics (ONS) and Government Statistical Service (GSS) would welcome your contribution to two consultations launched today.

The ONS has launched the Census 2031 topic consultation, asking for your views about the topics you think should be included in the next census. For more than two centuries, a decennial census has provided information about the population and housing, helping to inform decisions about public services and to better understand the economy, public health and inequality. While the core topics of age, education and jobs have remained the same over time, other topics such as armed forces veterans have been added based on the needs of users. This 14-week consultation will provide evidence to inform what topics will be included in the next census of England and Wales in 2031.

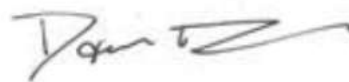
The GSS has also launched a consultation asking for your views on additional response options for ethnicity data. The GSS would like to understand your needs for data on additional ethnic groups, with the goal of making the harmonised ethnicity standard more inclusive.

Responses submitted over the 14-week period will feed into a new standard for ethnicity data collection, which will be recommended for use by collectors of ethnicity data across the GSS, including teams working on future censuses.

We would welcome your contributions to these consultations before they close on 4 February 2026. You can respond to the consultation in Welsh or English.

Both consultations are live on the [ONS consultations web page](#).

Yours sincerely,



Emma Rourke, Acting National Statistician & Darren Tierney, Permanent Secretary, Office for National Statistics

Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

Agenda Item 3.10



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref LN/PO/534/2025

Buffy Williams MS
Chair
Children, Young People and Education Committee
Senedd Cymru

SeneddChildren@senedd.wales

29 October 2025

Dear Buffy,


Inter-Institutional Relations Agreement: Education Ministers Council meeting – 13 November 2025

I am writing in accordance with the inter-institutional relations agreement to notify you of a meeting of the Education Ministers Council, which will take place on 13 November 2025.

The in-person meeting will be hosted and chaired by the Welsh Government in Cardiff. The meeting agenda will include discussion items on the Curriculum, Behaviour and the use of Artificial Intelligence in Schools.

An update will be provided after the meeting.

Yours sincerely,



Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Agenda Item 3.11

Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/LN/2345/25

Chair, Buffy Williams AS/MS
Children, Young People and Education Committee
SeneddChildren@senedd.wales

29 October 2025

Dear Buffy,

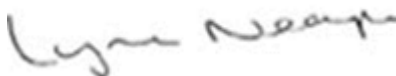
I would like to thank you, and the members of the Children, Young People and Education Committee, for considering the first three Legislative Consent Memoranda laid in respect of the Children's Wellbeing and Schools Bill.

The accompanying response notes the Committee's recommendation as set out in the report published on 19th September 2025.

I have sent a copy of the response to the Legislation, Justice and Constitution Committee, for information only.

Once again, I thank the Committee for the time taken to consider the Memoranda.

Yours sincerely,



Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

Copied to: Mike Hedges MS, Chair of the Legislation, Justice and Constitution Committee

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



The Welsh Government's Legislative Consent Memoranda on the Children's Wellbeing and Schools Bill

Response to the Children, Young People and Education Committee Report

30/10/2025

In September 2025, the Children, Young People and Education Committee submitted its report on the Welsh Government's Legislative Consent Memoranda for the Children's Wellbeing and Schools Bill. The report included one recommendation, which is addressed in this response.

1. Introduction

The Children's Wellbeing and Schools Bill ("the Bill") was introduced in the House of Commons on 17 December 2024. Amendments to the Bill to include Wales in certain provisions were introduced at report stage in the House of Commons on 10 March 2025. In accordance with Standing Order 29, a Legislative Consent Memorandum ("LCM") in respect of the amendments was laid on 24 March. The LCM made reference to the children not in school and social services provisions and sought the Senedd's Consent for these to apply to Wales.

Two supplementary LCM were laid on 28 May and 12 June, to include further amendments tabled by the UK Government, to include Wales in provisions relating to child employment, and to include aspects from the children not in school provisions that were omitted from the first LCM.

The Children, Young People and Education Committee published its report on the three LCM relating to the Bill on 19 September.

2. Response to the recommendation

Recommendation 1. The Senedd should grant consent for Clauses 11, 20, 25-30 and Schedule 1 (as set out in the LCM); clause 26 (as set out in SLCM No 2); clauses 35, 63 and 66 (as set out in SLCM No 3) of the Children's Wellbeing and Schools Bill.

Welsh Government Response: No response required.

Agenda Item 3.12

Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/LN/2345/25

Mike Hedges AS/MS
Chair, Legislation, Justice and Constitution
Committee SeneddLJC@senedd.wales

29 October 2025

Dear Mike,

I would like to thank you, and the members of the Legislation, Justice and Constitution Committee, for considering the first three Legislative Consent Memoranda laid in respect of the Children's Wellbeing and Schools Bill.

I have considered the Committee's conclusion and recommendations as set out in the report published on 19th September 2025. The accompanying response includes my response to each recommendation.

I have sent a copy of this response to the Chair of the Children, Young People and Education Committee, for information only.

Once again, I thank the Committee for the time taken to consider the Memoranda.

Yours sincerely,

Lynne Neagle AS/MS
Ysgrifennydd y Cabinet dros Addysg
Cabinet Secretary for Education

Copied to: Buffy Williams, Chair, Children, Young People and Education Committee

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.



Llywodraeth Cymru
Welsh Government

The Welsh Government's Legislative Consent Memorandum on the Children's Wellbeing and Schools Bill

Response to the Legislation, Justice and Constitution Committee Report

30/10/2025

Summary

The Children's Wellbeing and Schools Bill ("the Bill") was introduced in the House of Commons on 17 December 2024. In March 2025, amendments to the Bill were laid to include Wales in certain provisions. As these require the legislative consent of the Senedd the Welsh Government laid a Legislative Consent Memorandum (LCM) before the Senedd on 24 March 2025. This was followed by two supplementary LCMs, laid on 28 May and 12 June 2025.

In September 2025, the Committee submitted its report on the Welsh Government's memoranda for the Bill, which included five recommendations and a conclusion. This is the Welsh Government's response to the recommendations.

Responses to the five recommendations

Recommendation 1

The committee recommends that

Before stating that the capability and capacity of the Senedd has prevented the Welsh Government from introducing its own Bills to the Senedd and therefore resulted in the Welsh Government requesting and/or accepting the offer of provisions being included in Bills being introduced to the UK Parliament, the Welsh Government should first engage with the Business Committee and discuss the procedural opportunities available to the Welsh Government that would enable it to bring forward its own legislation.

Response: Accept in principle

The Welsh Government does not take the unilateral approach that the Senedd does not have the capacity or capability to introduce its own Bills, or that this is the basis for seeking these provisions via a UK Government Bill. As clarified by the Cabinet Secretary at LJCC session on 12 May, the decision to accept certain provisions in the Children's Wellbeing and Schools Bill was made as the Bill offers the opportunity to make provisions in the best interests of children in Wales, without negatively impacting the delivery of the Welsh Government's agreed legislative programme.

Primary legislation in this area was considered by the previous government but was discounted at the time in favour of secondary legislation. The 'children not in school' Clauses that we propose to accept, comprise just one element of a much wider, two-part UK Government Bill. Although a significant amount of work has been undertaken in relation to the policy in Wales, there would still be a need to develop this work further to underpin our own Bill and determine what remaining elements relating to children's safeguarding, wellbeing or education, would comprise a Senedd Bill. This would result in a significant delay to the legislation being introduced in Wales whilst a Bill is developed, compared with full implementation of the Children's Wellbeing and Schools Bill in England.

As with any legislative decisions-the Welsh Government's priority is to maximise the outcomes for the people of Wales in line with our priorities. That includes working within the constraints of how much capacity we have to introduce our own legislation and what opportunities are available in the UK Government's legislative programme. Given that the Welsh Government and the UK Government are clearly aligned on these proposals, which are ultimately about safeguarding children, a joint, cohesive approach via this UK Government Bill is the preferred way forward.

The Welsh Government remains willing to engage with the Business Committee on how legislation is made in Wales, and any associated impacts on the legislative consent process.

Financial implications – none associated with this recommendation.

Recommendation 2

The committee recommends that

The Cabinet Secretary should explain why clause 11 is subject to commencement by the Secretary of State rather than the Welsh Ministers, including why no requirement for consent is included should that be relevant.

Response: Accept

The Secretary of State retained commencement powers for the clause when the amendment was made. Clause 11 relates to Section 25 of the Children Act 1989 and is about regulating use of secure accommodation in England even though part of what it does is to permit access to children from Wales. Section 119 of the Social Services and Well-being (Wales) Act 2014 deals with use of secure accommodation in Wales; however there is no parallel amendment to section 119. If there was a parallel amendment to section 119 of the Social Services and Well-being (Wales) Act 2014 it would have been appropriate for Welsh Ministers to have commencement powers, but in its absence, it would be unexpected to give Welsh Ministers control over commencement of the provision.

Financial implications - No additional financial implications as there is no new duty on Welsh local authorities.

Recommendation 3

The committee recommends that

The Cabinet Secretary should clarify to which international obligations she is referring in paragraph 26 of Memorandum No. 2.

Response: Accept

The UK is a signatory to international treaties regarding child employment through its ratification of the United Nations Convention on the Rights of the Child (UNCRC) and the International Labour Organization Convention 138 on Minimum Age for Admission to Employment. *The Rights of Children and Young Persons (Wales) Measure 2011* has also incorporated certain parts of the UNCRC (including provisions relevant to child employment) into Welsh law. Both treaties mandate that children must be protected from economic exploitation and work that is harmful to their health, development, and education, and the UK implements this through domestic laws and regulations on child working hours, suitable employment, and age restrictions for different types of work.

Financial implications - none associated with this recommendation.

Recommendation 4

The committee recommends that

The Cabinet Secretary should provide an update on the discussions with UK Government about clause 63 of the Bill (as brought from the Commons) and confirm that, in line with the Welsh Government's principles on UK legislation in devolved areas, she is seeking conferral of powers on the Welsh Ministers alone and not concurrent powers to be exercised with UK Ministers.

Response: Accept

Following further engagement with UKG, I have requested an amendment to the Bill to ensure that Clause 63 provides for the Welsh Ministers, rather than the Secretary of State to make consequential provision including amendments to primary legislation, including to Acts of the Senedd. The Bill as drafted does not include this power and this issue has been raised with UKG.

Financial implications - none associated with this recommendation.

Recommendation 5

The committee recommends that

The Cabinet Secretary should confirm the scrutiny procedure to be applied to the making of regulations under clause 66 of the Bill (as brought from the Commons).

Response: Accept

I can confirm that as the clause relates to commencement powers, no scrutiny procedure is applied.

Financial implications – none associated with this recommendation.