



Pembrokeshire's Additional Learning Needs (ALN) Principles- Autumn 2025

*To inform the Local Authority and School's decision-making processes
as set out within the Additional Learning Needs Act and the ALN Code
for Wales.*

Updated autumn 2025

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1. Introduction

This document has been produced to inform the decision-making processes for schools and the Local Authority (LA) in relation to children and young people with Additional Learning Needs (ALN) under the Additional Learning Needs Act and Code for Wales 2021.

The Additional Learning Needs and Education Tribunal Wales (ALNET) 2018 Act provides legislation for supporting children and young people with ALN, and is accompanied by a mandatory Code. The legislation includes the following aims:

A fully inclusive education system where all children and young people are given the opportunity to succeed and have access to an education that meets their needs and enables them to participate in, benefit from, and enjoy learning.

A rights-based approach where the views, wishes and feelings of the child, young person and their parents / carers are central to the planning and provision of support; and the child, young person and their parents / carers are enabled to participate as fully as possible in the decision-making processes. This can be achieved through the implementation of Person-Centred Practice (PCP).

Early identification, intervention and effective transition planning where needs are identified and provision put in place at the earliest opportunity.

Collaboration where services work together to ensure ALN are identified early, and appropriate co-ordinated support is put in place to enable children and young people to achieve positive expectations, experiences and outcomes.

Inclusive education which supports full participation in mainstream education, wherever feasible, and a whole setting approach to meeting the needs of children and young people with ALN.

A bilingual system where all reasonable steps are taken to deliver Additional Learning Provision (ALP) in Welsh.

The starting point of the decision-making processes in Pembrokeshire, in respect of Additional Learning Needs and Additional Learning Provision will be the aims and principles described above.

The ALN system is supported by a **person-centred process** of collaboration and co-production, which facilitates discussion about needs, outcomes and provision, with disputes and disagreements avoided, or resolved at an early stage.

Consequently, the decision-making process in respect of ALN in Pembrokeshire will be determined by the extent to which schools have made sufficient efforts to apply these principles and Person Centred Practices.

2. Definition of ALN

For the purposes of the Act, the use of the term ALN relates to individual children and young persons who have “Additional Learning Needs” i.e. they have a learning difficulty or disability

(whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for Additional Learning Provision.

Many children and young people are likely at some point to experience short term issues with their learning, for example because of a period of absence from an education setting caused by a temporary illness, or because they have suffered a bereavement or some other trauma. In these circumstances, schools may need to take action to help the child or young person catch up and / or to prevent the issue from escalating. These situations would not ordinarily amount to ALN on their own; but it is possible that in some cases, this could result in a difficulty in learning which calls for ALP.

For those children and young people who do not have an identified disability, in the first instance, observing and assessing their progress will provide information about areas where they are not progressing satisfactorily (ALN Code 20.4).

On the basis of this evidence, including the data collected, it should be possible to identify learners making less than expected progress. This can be characterised as progress which:

- is significantly slower than that of their peers starting from the same baseline;
- fails to match or better the child's or young person's previous rate of progress; or
- fails to close, or widens, the attainment gap between the child or young person and their peers, despite the provision of support aimed at closing that gap (such as differentiated teaching) (ALN Code 20.8).

2.1 Definition of ALN – a 2 step approach

To establish whether a child of compulsory school age or young person has ALN, the following tests must be applied.

Test 1 - Does the child or young person have a learning difficulty or disability?

A child or young person of compulsory school age or above has a learning difficulty or disability if he or she—

(a) has a significantly greater difficulty in learning than the majority of others of the same age, or

(b) has a disability for the purposes of the Equality Act 2010 which prevents or hinders him or her from making use of facilities for education or training of a kind generally provided for others of the same age in mainstream maintained schools or mainstream institutions in the further education sector.

If the answer to either (or both) question is 'yes', it is necessary to proceed to apply the second test.

If the answer is 'no' to both questions, the child or young person does not have ALN.

Test 2 - Does the learning difficulty or disability call for ALP?

The second test is whether the child or young person's learning difficulty or disability calls for ALP.

[Additional Learning Provision](#) for a person aged three or over means educational or training provision that is additional to, or different from, that made generally for others of the same age in:

- a) mainstream maintained schools in Wales;
- b) mainstream institutions in the further education sector in Wales; or
- c) places in Wales at which nursery education is provided.

ALP can take many forms; it might include any support that takes place inside or outside the mainstream classroom, where it is additional to, or different from, that made generally for others of the same age.

ALP might also be delivered in settings outside of the school or in some circumstances and/or by external professionals.

If the answer to both 'tests' is YES, the child or young person has ALN for the purposes of the Act.

If the answer to either 'test' is NO, the child or young person does not require an IDP.

Where it has been agreed that a child or young person has ALN and ALP is to be secured, an Individual Development Plan (IDP) will be drafted and maintained.

2.2 A decision making process

In order to help with the decision-making process in relation to whether a child or young person has ALN, Pembrokeshire LA, in collaboration with the South West Region, have developed a staged process which is based upon Person Centred Practices:

Decision Making Process: Step-by-Step Guide

This process should usually last no longer than 1 term. Parents or CYP can ask LA to reconsider a decision they disagree with

Step 1: Gather Evidence - potential needs are emerging and need to be investigated, planned for, and monitored.

- Collect person-centred information, learner assessment data, and any additional information required based on the potential emerging needs- e.g. teacher assessment, progress reports, TAPPAS discussions, other professional reports, etc

Step 2: Person-Centred Meeting

- A designated staff member arranges a meeting (usually ALNCO but this can be delegated).
- Meeting follows person-centred principles, and reflective, person-centred tools to be used
- Children and Young People (CYP) and their families are included.

Step 3: Decision Making (Removing Barriers)

- Collaborative decisions are made about how to support the CYP's emerging needs.

Step 4: Planning (including during Person Centred Meeting)

- Use 'The Support Sequence' to determine how best to support the CYP.

- Record agreed decisions, actions, and provisions: generally available [inclusive learning provision](#) 'ULP'; and/ or [additional learning provision](#) ALP.
 - If it is determined that the CYP has ALN that requires ALP, an IDP will be prepared.
 - If CYP needs can be met by generally available inclusive learning provision 'ULP' issue a no IDP notice
 - Develop a One Page Profile
 - Share the Support Sequence or IDP with stakeholders, the family, and the CYP.
 - Set a review date.
 - Identify potential training needs for staff
 - Record agreed actions
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Step 5: Do (Implementation)

- Implement the actions agree in the Support Sequence ([Inclusive learning provision](#)), or in the IDP ([ALP](#)).
 - Teacher/tutor delivers the planned support.
 - Monitor progress.
 - Gather evidence of impact for review.
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Step 6: Person-Centred Review

- Review facilitated by the designated staff member on the agreed date.
 - Reflective, person-centred tools to be used to identify impact/ progress/ next steps
 - CYP and family are included.
 - Review and update the Support Sequence or IDP as needed.
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Step 7: Decision Making (Next Steps)

- Collaboratively decide on future actions and next steps.
 - If ongoing support is needed, update and share the Support Sequence or IDP.
 - Set the next review date with all stakeholders.
 - Record agreed actions
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3. Additional Learning Provision – LA or School Maintained IDP?

Section 12.44 of the Code states that:

Local Authorities should, in consultation with schools they maintain, and any other persons they consider appropriate, establish and publish a set of principles they will apply when determining whether it is reasonable for a school to secure the Additional Learning Provision (ALP) required by a pupil or whether the authority ought to do so. Principles should relate to:

- The extent and duration of advice from external specialists that is likely to be unreasonable for a school to secure;*
- The equipment that it is likely to be unreasonable for a school to provide;*

- c) *The intensity and duration of support and scale of internal engagement of staff (including the ALNCo) at the school that it is likely to be unreasonable for a school to provide.*

3.1 School Maintained IDP

If a decision has been made that a child or young person has ALN, then an Individual Development Plan (IDP) needs to be prepared.

In most cases, the school will be responsible for preparing and maintaining an IDP as part of a graduated response.

Schools will therefore be responsible for securing the Additional Learning Provision needed for the majority of learners with ALN. Any decision regarding whether a maintained school can be reasonably expected to secure the ALP will be based upon the principles outlined below.

In its decision making around whether a school or the LA should develop and maintain the IDP, the LA will be mindful of circumstances outlined in section 12.43 of the ALN Code, where it may be unreasonable for the school to secure ALP.

These include instances where the learner:

- Has a low **incidence condition / rare condition** which requires specialism that the school cannot provide (for example profound and multiple learning difficulties);
- Requires **regular advice and support** from external agencies which is over and above that which can be reasonably arranged and accessed by the school (for example weekly specialist input from a Brailist or Qualified Teacher of the Deaf);
- Requires **equipment** that can only be used by one pupil or cannot be re-used or is beyond the reasonable resources of the school; or
- Requires very **intensive daily support** which cannot be reasonably funded or secured by the school's budget.

3.2 Local Authority Maintained IDP

In some cases the decision whether a pupil has ALN and for preparing and maintaining an IDP is made by the Local Authority. There are two instances in which a maintained school is **required** to refer a child's case to a local authority rather than decide for itself whether the child has ALN:

- Where the pupil is dually registered
- If the child is looked after

In these cases, Pembrokeshire LA will have the duty to decide and develop the IDP and will maintain the IDP through the delegated resources to the school.

A maintained school can choose to refer a child's case to a local authority but should only do so if it considers that the child has ALN:

- a) that may call for ALP it **would not be reasonable** for the school to secure;
- b) the extent or nature of which it **cannot adequately determine**; or
- c) for which it cannot adequately determine ALN.

Local arrangements

Pembrokeshire LA will maintain IDPs for primary aged pupils who require 15 hours* or above of individual support to deliver the ALP. The LA will fund any additional hours agreed at the LA IDP Panel from the Inclusion Service 'exceptions' fund. **Some discretion will be applied for in respect of small schools (below 85 on roll)*

Pembrokeshire's Secondary school's ALN budgets are fully devolved and therefore no additional funding is available to secondary schools through the ALN IDP Panel.

Pembrokeshire LA will also maintain IDPs for those pupils who access EOTAS, a special school, or Learning Resource Centre LRC.

The school should act promptly to consider whether to refer the child's case and consequently make any referral. In most cases, the school ought to be able to make the referral within 20 school days (if not earlier) from the date on which it is brought to its attention, or otherwise appears to it, that the child has ALN which it cannot be reasonably expected to provide for from its own resources.

Further information on making a referral to the Local Authority is given below and in the 'Guide for Schools' provided by the ALN team.

4. Principles for determining whether a school or LA should secure ALP

The ALN Code recognises that the extent to which a school or other setting meets the needs of all children and young people will have a direct bearing on the nature of the Additional Learning Provision (ALP) likely to be required by learners with ALN, as well as the point when ALP is required.

The ALN Code places a duty upon Pembrokeshire LA to review its arrangements for children and young people with ALN, as well as those of Governing Bodies (GBs) of maintained schools.

This includes having regard to the level of ALP in place. The ALN Code (Chapter 7 para 7.10) requires each LA to gather evidence upon the extent that the following are available in maintained schools:

- (a) high quality, differentiated teaching for individual children and young people;
- (b) targeted intervention and support for children and young people with ALN;
- (c) effective systems for monitoring the progress and achievement of children and young people with ALN and their inclusion in the everyday life of the school;
- (d) arrangements for involving specialists in cases where it is appropriate to do so;
- (e) arrangements for reviewing the effectiveness of interventions used to support children and young people with ALN and the skills and expertise of staff;
- (f) arrangements for involving children, young people and parents at every stage.

Pembrokeshire's Inclusion Service will work with schools to ensure that they are able to fulfil their statutory obligations in relation to the above expectations. The LA will support schools,

provide training and help to develop and embed systems and processes to secure the above. Funding mechanisms may need to be reviewed.

4.1 A Graduated Response

Maintained schools and local authorities should adopt a graduated response in relation to children and young people with ALN, making use of a wide range of strategies. “This means that the ALP made should be at the lowest level necessary to meet the child or young person’s identified needs” (ALN Code 20.23).

In particular, schools should make full use of their available resources before bringing specialist expertise to help support. In many cases the ALP initially made will mean that the child or young person’s needs are fully met or resolved.

Only for those children or young people whose progress continues to cause concern, is increased or different ALP likely to be needed. Some children or young people may gradually require less rather than more ALP if the interventions are a success.

External agencies can support the process of deciding whether a person has ALN and determining the ALP required in a number of ways. They can offer advice and support staff with strategies or obtaining more information, undertake assessments and /or observations to provide more information about the child or young person’s needs, and suggest interventions and alternative forms of provision. External agencies might also be the appropriate body to directly provide the ALP required. ALNCo’s must secure relevant services that will support a pupil’s ALP as required.

Some learners with ALN will need the support of external agencies and professionals. It will be the responsibility of the ALNCo to liaise with these specialist services and when there is agreement to provide such services, ensure that these are secured. The exception to this would be in respect of services provided by Health.

4.2 Generally available inclusive provision ‘ULP’

All education settings are expected to put in place differentiated teaching strategies and /or other targeted interventions designed to address an attainment gap and therefore secure better progress for learners. These strategies and interventions form part of the high-quality teaching and inclusive learning provision made generally available to all learners within the setting.

4.3 Additional Learning Provision (ALP)

If a learner does not make appropriate progress in their learning and /or any barriers to learning are not addressed through Inclusive Learning Provision, or they present with *significantly greater difficulties* in their learning than the majority of others the same age, then an enhanced targeted package of support may be needed so that they can make progress and achieve their potential. This may include intervention and support using school-based expertise or through external agency support.

The process to determine whether a school or the LA should secure ALP, and subsequently will maintain the IDP, will be based upon the following evidence from school:

- evidence that it is not reasonable for ALP to be secured there; or
- that it is unable to determine nature or extent of a pupil’s ALN; or
- that there is an inability to adequately determine the ALP required to meet a learner’s needs.

In addition to assessing evidence in respect of the inclusive learning provision, Pembrokeshire LA will also take into account its arrangements to support schools, including the extent to which its delegated ALN budget is used for such support. It will also take into consideration the deployment of its own support services and those secured from improvement partners for learners with ALN.

4.4 The Local Authority IDP panel

ALNCo's can refer to the LA panel following a Person Centred Planning meeting/ review by contacting ALNIDPPanel@pembrokeshire.gov.uk

The ALNCo must clearly outline which reason they are referring to the LA panel.

- evidence that it is not reasonable for ALP to be secured there; or
- that it is unable to determine nature or extent of a pupil's ALN; or
- that there is an inability to adequately determine the ALP required to meet a learner's needs.

If the criteria is met and there is sufficient evidence for the LA to be involved, panel will allocate a Lead LA Officer and issue an IDP Notice to the Parent.

Referrals from parent or other professionals

In the event of Pembrokeshire LA receiving a referral directly from a parent / carer or other professional, the LA will consider whether the school is best placed to decide whether or not the learner has ALN. In cases where this is determined, Pembrokeshire LA will inform the school and the duty to decide rests with the school

The LA Panel will also determine appeals from parents where a parent has:

- Appealed against a No IDP Notice issued by the School
- Appealed against the provision outlined within the IDP

When a Section 65 has been issued by school and the relevant health professional has determined ALP to be provided by the health board, the LA IDP panel will issue Section 20 referrals. ([5. Health provision](#))

5. Health Provision

If the learner is likely to require additional learning provision from the Local Health Board, schools must issue a **PCP/ Section 65 Notice** (request for information) to Hywel Dda Health Board

If a Health professional has determined ALP to be delivered by a health professional in either 2B or 2C of the pupil's IDP, the school should refer to the LA IDP Panel indicating a **Section 20 Notice** (request for a treatment or service) is required.

Health ALP is not clearly defined under the code but as a general guide:

- refers to 'a relevant treatment or service that is likely to be of benefit in addressing the child or young person's additional learning need' (20.4), and
- indicates that such a treatment or service should be documented in the individual development plan as 'additional learning provision [...] to be secured by an NHS body (21.5), and

- explicitly defines ‘relevant treatment or service’ as ‘any treatment or service that an NHS body would normally provide as part of the comprehensive health service in Wales continued under section 1(1) of the National Health Service (Wales) Act 2006 (20.6).

5.1 Process for Involving NHS Professionals in Person-Centred Planning for Children and Young People with ALN

Section 65 referrals: requesting the involvement of NHS professionals in the person-centred planning process

The ‘PCP Notification’ digital form must be used for requesting the involvement of NHS professionals in the person-centred planning process. The form is to be used to invite relevant NHS professionals to attend Person-Centred Planning or Review meetings, and/or to request information needed to support decision-making and planning for children and young people who have or may have ALN under Section 65 of the ALN Act.

The link for the PCP Notification Form is <https://forms.office.com/e/K9cpxTC6De>

On submission, the form will go directly to the mailbox of the relevant service/s. You will receive an email, giving you as ‘proof of receipt’ and a record. For children who already have an IDP that is being reviewed, you will be asked to submit their current IDP to provide relevant information to the Health professional/s

Section 20 referrals: request for a treatment or service from a Health professional

If, following the PCP/PCR meeting, based on information that’s been shared it is likely that the involvement of one or more NHS service will be of benefit in addressing the child or young person’s ALN and helping them to achieve an intended outcome, schools should refer to the LA IDP Panel to request a Section 20 referral ALNIDPPanel@pembrokeshire.gov.uk

Where appropriate, the Local Authority will issue the Section 20 referral on your behalf.

6. Advice and Information, Disagreements and Appeals

It is likely that from time to time, there may be disagreements and differences of opinion regarding the requirement for an Individual Development Plan (IDP), or the level of support and provision set out in an IDP. All educational settings should focus on providing children, young people and their parents an opportunity to raise concerns or questions at every stage of the process. In the majority of cases, early intervention and taking a person-centred approach will avoid disagreements and the potential escalation to a more formal disagreement resolution forum.

Children, young people and parents are therefore encouraged to seek to resolve issues with those who are directly involved with them in the education setting. Chapter 32.3 of the Code specifies that Local Authorities must make arrangements for avoiding and resolving disagreements regarding exercising the education body’s functions under part 2 of the Act between:

- Maintained schools, FEIs or LAs
- Children and Young People for whom the LA is responsible for

Children for whom the LA is responsible is covered in Chapter 1.24 of the code

‘Whether a child or young person is in the area of a local authority usually depends upon where the child or young person ordinarily resides. This means that a child or young person

can be in the area of a local authority (and so the local authority is responsible for them) where the child or young person attends an educational setting in another local authority's area'.

Pembrokeshire's Parent Partnership Service (PPS) provides impartial advice and information about Additional Learning Needs (ALN) and the ALN system.

<https://www.pembrokeshire.gov.uk/parent-partnership-service>

Parent Partnership Service (PPS) offer impartial support to children or young people, and/or their parents where there is a disagreement about the support the pupil gets at school or college, a decision about Additional Learning Needs, or about an IDP. A referral for Independent Disagreement resolution service can also be made through PPS

An advocacy provision is available through Parent Partnership Services, the team can offer impartial, confidential and skilled advocacy to children, young people with ALN, or (when appropriate) their case friends. The Parent Partnership Service will also make a referral to an Independent Advocacy Service in circumstances when this service is required.

Ultimately, disagreements can be resolved through referral to the Educational Tribunal for Wales (ETW)

<https://www.pembrokeshire.gov.uk/parent-partnership-service/disagreement-resolution-advocacy-and-tribunal>