



Llywodraeth Cymru  
Welsh Government

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# Assessing the impact of the initial policy decisions taken in relation to the provision of education in response to COVID-19: impact assessment

We assessed the impact of the initial policy decisions taken in response to COVID-19 from early March 2020 to mid-June 2020.

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# What action is the Welsh Government considering and why?

## 1.1 The initial education response

The Coronavirus (COVID-19) pandemic has resulted in an unprecedented situation where, in order to respond to and where possible mitigate the public health emergency, significant, complex and often difficult decisions have had to be taken, often within very compressed timescales. As a result, unlike normal integrated impact assessments (IIA), this document sets out the impact of decisions that have already been taken, rather than proposed policy proposals, to provide a transparent account of the actions and mitigations that the Welsh Government has had to take during this emergency period. Unusually, this IIA also provides a narrative account of the initial decisions taken and the subsequent development of these policies, including the implementation of mitigating actions, during the initial crisis period from early March to mid-June. This was considered necessary given that

- the full impact of these decisions was not necessarily apparent at the time that they were taken
- the challenging timescales have necessitated an iterative approach to policy development. For example, following the exam cancellations the arrangements for how grades would be calculated were announced for learners in Years 11 and 13, prior to the arrangements for learners in Years 10 and 12
- areas of additional need or concern have been identified through ongoing stakeholder engagement, issues raised directly through correspondence and social media, as well as the publication of research

This IIA covers the immediate actions taken in the Education Department, in light of the evidence from the UK Government's Scientific Advisory Group for

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Emergencies (SAGE) and advice from Public Health Wales. The policy decisions covered in this assessment include:

- bringing forward the Easter school holidays and repurposing schools to make provision for children who are vulnerable, or whose parents are critical to the COVID-19 response
- the arrangements to provide support for those learners currently eligible for Free School Meals (FSM)
- the development of a Continuity of Learning programme to support our learners to keep learning and support the well-being of our learners, and the education workforce during the period that schools are repurposed
- modifications to local authority duties in respect of suitable education and statements of special educational needs (SEN)
- an expectation that local authorities will undertake SEN risk assessments for the purposes of identifying those learners with statements of SEN which are vulnerable and for identifying the support which can be put in place to enable learners with statements of SEN to continue learning
- the cancellation of the summer exam series and the calculation of grades for learners due to take GCSEs, AS levels, A Levels and the Skills Challenge Certificate
- the pausing of the work on the proposals for home education statutory guidance and the draft database regulations for local authorities
- budget cuts being made within the education department in order to release funding required to respond to the COVID-19

These policy decisions are interrelated and presenting them together within a single IIA allows the cumulative impact on specific groups of learners, the workforce and communities to be considered and more effective mitigating actions planned. Similar IIAs will shortly be published in relation to Childcare, Early Years and Play and the Post-16 sector, which together should provide a holistic view of the impact on children and young people across the education sector.

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Whilst we have assessed the impact of these decisions as thoroughly as we can at this time, as the impact of these policy decisions becomes clearer for example, as new evidence becomes available or policies are reviewed and adapted, this IIA will be kept under review and updated periodically.

The next update will include the modification or disapplication of some statutory education requirements (using the emergency powers in the Coronavirus Act 2020) that cannot be met, or would cause a disproportionate administrative burden during this period of disruption for example, those relating to the teaching of the basic curriculum. Whilst the policy intention for some of these changes has been signalled, such as the disapplication of the basic curriculum or modification of certain Special Educational Needs requirements, the legislative changes are still being assessed. It is anticipated that the first update will be completed prior to the start of the next academic year.

Importantly, the lessons learned from our experience in taking these initial decisions and the impact that these have had on groups of learners, the education profession and local communities will help inform the policies developed to support recovery within the education sector, in particular the increased operation of schools and settings.

On 3 June, **the Minister for Education announced** that schools would increase operations over the period from 29 June until 27 July, so all learners have the opportunity to 'check in, catch up and prepare' for summer and September. As a result, the IIA in relation to increasing operations in schools and settings is being published alongside this one, to allow the cumulative impacts of these decisions and how we are seeking to address them to be considered.

The Welsh Government's response to the pandemic continues to evolve with more actions taken both to respond to the continuing pandemic, but also to plan for effective recovery. Where these are significant, such decisions will be set out in future IIAs.

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## Bringing forward the Easter holidays and re-purposing schools

On 18 March the Minister for Education made a **statement** bringing forward the Easter break for schools and settings in Wales, announcing they would close for statutory provision of education at the latest on 20 March 2020. A further **statement** was made on 20 March, explaining that from 23 March schools and settings would be closed for children and young people with the exception of making provision for those who were **vulnerable**, or whose parents were critical to the COVID-19 response so they could continue to work where alternative childcare arrangements could not be made.

**A list of those designated a critical worker, if their work is critical to the COVID-19 response, is available.** In developing this list of critical workers we worked closely with the other UK administrations, with a clear steer from Welsh Ministers that it was essential to have consistency with the approaches being taken across the UK, to limit any confusion for the public.

In the week between the World Health Organisation (WHO) declaring a global pandemic on 11 March, and the statement from the Minister for Education regarding the Easter holidays, the scientific advice regarding coronavirus evolved rapidly. Welsh Ministers and Welsh Government officials were engaged in discussions and briefings at a Wales and UK level, including those from SAGE and COBR.

While the scientific advice was, and still is, that children are not at a particularly significant risk from COVID-19, it was clear that parents were not reassured by this. Schools started reporting significant drops in the number of learners attending. Alongside this there was an increase in the numbers of the education workforce isolating, either due to concerns they or a family member had contracted COVID-19, or because they were concerned about underlying health conditions. The UK Government had at this time published updated guidance on when and how to self-isolate.

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Local authorities across Wales had been contacting the Welsh Government seeking advice on how to manage absences, and raising concerns that the operation of some schools or settings was becoming untenable.

The UK Government's decision to move from 'mitigate' to 'delay' in line with the phases set out in their Coronavirus Action Plan exacerbated these concerns, leading to additional queries from unions, schools and parents.

In light of the increasing calls for leadership and guidance, and having reflected on the outcome of COBR, the Minister for Education made her statement of 18 March. That statement said the Easter holidays would be brought forward by two weeks, and that schools would close for the provision of statutory education from 20 March. The statement also set out that some schools and settings would remain open for children of critical workers and vulnerable children. This decision was made to ensure critical services could continue without disruption and children most at risk or in need of additional support could access provision. The definition of vulnerable children largely mirrored the definition in England to ensure children in Wales were not at any disadvantage. The definition ensured Public Health Wales guidelines about social distancing could be followed in these schools and settings but ensured access for children with social workers who would be considered at highest risk and who may need some time away from their home environment. Children with statements of Special Educational Needs (SEN) were also included to ensure children and families needing additional support could have that provided in these schools and settings. Following that announcement, schools across Wales began preparing for an early end of term.

As of 1 January 2020 there were 1,480 maintained schools in Wales and 68 independent schools. Following the decision to repurpose schools from 23 March we have collected data from local authorities on the number of schools remaining open daily. As of the first week of June, around 450 local authority maintained schools or 'hubs' across Wales were open, **with up to 6,700 children in attendance**. This represents 1.4% of the overall school population

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and up to 5.9% of vulnerable children, however, the numbers fluctuate, resulting in higher and occasionally lower numbers of schools accepting children each day. There were an estimated 185,600 school aged (5 to 16) children of critical workers in Wales in 2018. There are an estimated 24,000 vulnerable children (those with a social worker or statement of special educational needs) in Wales.

Before the Easter break low numbers of vulnerable children were in attendance at these schools and settings for a number of reasons including: parental concern about the risks to their children attending; local authorities finding other ways of keeping in touch with vulnerable children; and local authorities developing the provision over time. As lockdown continued the Welsh Government wrote to Directors of Education and Social Services emphasising concerns about the low numbers and encouraging local authorities to increase the numbers of vulnerable children attending for safeguarding reasons. Following the Easter break numbers rose significantly.

The operational delivery of repurposed schools is a matter for local authorities and their schools and depends on the local circumstances and needs in their areas. However, since 23 March we have seen an increasing move towards schools operating as 'hubs'. This has been facilitated by local authorities and in effect involves certain schools within an area accepting both their own learners and learners from other schools, where they are the children of critical workers or vulnerable children. Given the small numbers in attendance this offers a more operationally effective way of undertaking this role.

## **Free school meals**

In light of the need to close schools to the majority of learners and the associated timescales within which this announcement was made, emergency arrangements had to be put in place by local authorities to ensure that children and young people eligible for free school meals were able to receive access to alternative provision. There was significant concern that without such

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arrangements children and young people who rely on free school meals provision during term time could go hungry as schools were closed to the majority of learners, or their families could face considerable financial hardship in having to meet additional and unforeseen food costs.

On 21 March, the Minister for Education announced that up to £7 million of additional funding would be made available to local authorities to support families of learners who rely on free school meals, but who are unable to receive them due to the school closures. This was accompanied by guidance to local authorities to assist in the making of alternative arrangements. From Monday 23 March, local authorities mobilised their emergency provision for families and a variety of approaches were adopted, based on needs and circumstances of local areas. Initially these included 'grab and go' bags, supermarket vouchers, community hubs offering food, and in some small cases home delivery.

Whilst these emergency arrangements were in place, the Welsh Government considered the implementation of longer term provision, this included the possibility of adopting a national voucher scheme. It was concluded that the most appropriate approach would be to enable local authorities to determine the arrangements that work best for their local communities. This would support local authorities to continue to operate flexibly, adopting approaches that are based on their local needs and circumstances including rurality, numbers of children and young people eligible for free school meals and existing catering and food supplier arrangements.

To support this, and provide certainty for local authorities and schools to plan their longer term arrangements, the Minister for Education **announced** an extra £33 million for local authorities to continue to provide free school meals for eligible children until schools re-open to the majority of learners or until the end of August if necessary.

The Welsh Government has made available up to £3.90, per child, per day (or £19.50 per five day week). Revised guidance, developed in consultation with key

stakeholders and drawing on the lessons learned in the first four weeks of operations, was prepared outlining three main options for providing free school meals that require the least amount of social interaction, namely:

- the provision of vouchers
- the delivery of food items to the families of learners in receipt of free school meals
- a transfer of funds to the bank accounts of families eligible for free school meals (BACS payments)

In some instances, local authorities are operating a number of these types of provision in parallel to tailor support to the needs of their local communities. This enables different needs to be taken into consideration for example, social distancing, shielding advice and safeguarding.

As at January 2020, approximately 85,000 children and young people were eligible for free school meals in Wales, although only around three quarters of those eligible for this support do take it up. However, as eligibility for free school meals is **dependent on a learner's parent or guardian being in receipt of an income related benefit**, for example Universal Credit, the numbers eligible are likely to increase due to the current economic circumstances created by the COVID-19 pandemic.

## **Continuity of learning programme**

On 20 April, on what would ordinarily have been the start of the summer term, the Welsh Government published 'Stay Safe. **Stay Learning: Continuity of learning policy statement**'. Welsh Ministers recognised that we were asking schools and settings, headteachers and practitioners to work in ways which were very different to their normal practice, and to engage with different groups of learners in different ways. Welsh Government was clear that this provision would not mirror what schools and settings would offer during normal times and,

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as noted earlier, has been considering how the legal framework can be altered to reflect this.

Although drawing in and being relevant to a wide range of organisations, the following stakeholders are directly contributing to the 'Stay Safe: Stay Learning' programme:

- Regional School Improvement Consortia
- Local authorities
- Estyn
- National Academy for Educational Leadership
- Qualifications Wales

Through the policy statement, Welsh Government set out shared priorities for our education system for this period when most learners are not able to attend schools and settings in person. It highlights the shared commitment to combine equity with excellence and the importance of considering the needs of every learner as we work through these extraordinary challenging times. During this period, the priorities of the Welsh Government, and all our partners across the education system, are to support:

- the safety of all our learners and our education workforce
- the physical and mental health and well-being of all our learners and our education workforce
- the ability of all our learners to keep learning
- learners' transition back into school and onto the next phase of their learning when the time comes

The Stay Safe Stay Learning programme pulls together multiple contributions from across education and beyond to provide support, to create and share high quality programmes for remote learning with resources to support a wide range of activities. The programme comprises both work on underpinning principles, and specific workstreams developing a range of support; these include work on:

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- communications and shared understanding; including the development of the policy statement and non-statutory guidance providing system-wide clarity and focus on expectations
- technical guidance and operational support for practitioners and learners to support learning through digital tools (including for those learners and families who do not have access to online connectivity and digital devices)
- advice and support tools for practitioners and school leaders on the focus of remote learning, including means through which this could be managed and delivered
- advice to parents on what to expect from schools and how to support their children's learning at home
- advice to governors and school leaders on managing business at this time, including measures to ensure the health, safety and well-being of staff and managing contact with learners
- the development of a broader range of online professional learning for staff in schools and settings
- enhanced mechanisms for developing, sharing and making available remote learning resources, including through enhanced use of the Hwb online learning platform. This work includes particular emphasis on resources and support for learner health and well-being, as well as supporting remote learning where Welsh (or English) is not the home language

Recognising that the repurposing of schools risks having the greatest impact on some of our most vulnerable and disadvantaged learners, inclusion has been prioritised as one of the underpinning principles of the Continuity of Learning programme (alongside issues such as evaluation, impact, coordination and reporting).

The Stay Safe: Stay Learning Continuity of Learning programme seeks to benefit the widest possible cohort of learners, given that we know the lines of vulnerability and disadvantage are likely to be blurred during this particularly unsettling time. However, the objective of the programme's underpinning 'inclusion' principle is to ensure the breadth of support provided (as outlined

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above) focusses on ensuring support for vulnerable and disadvantaged learners is inclusive and equitable with their peers during this period of disruption. Within this, we are focussing on five particular groups of learners:

- those with special educational needs (SEN)
- ethnic minority learners, particularly those with English or Welsh as an additional language, and learners from the Gypsy, Roma and Traveller communities
- learners eligible for Free School Meals
- those educated otherwise than at school (EOTAS)
- vulnerable children, including children at risk, looked after children and young carers

In this way we are seeking to mitigate the impact of the repurposing of schools and settings on children and young people, in particular those who face barriers to learning that **research** shows will be most affected 10. Programme management for this includes a group linking policy officers with relevant representatives from local authorities, regional consortia and the third sector to ensure the needs of such learners are recognised. An example of how this emphasis is being taken forward is the announcement on 29 April of an extra £3 million for local authorities to support digitally excluded learners across Wales to access remote learning tools (this includes hardware provision, re-purposing of devices and internet connectivity). While many schools had taken the initiative and were already taking steps to address learner access and distribute hardware in advance of the Easter break, it became clear that additional support (and funding) was required to help meet learner needs.

On 18 May **further guidance** was published for governing bodies, headteachers and practitioners regarding the provision of education to children and young people aged 3 to 19. This guidance, titled 'Stay Safe Stay Learning: supporting the education system' was developed with local authorities, Diocesan Authorities, Trade Unions, regional consortia, Estyn and the National Academy for Educational Leadership.

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The purpose of this non-statutory guidance is to provide further details on what governing bodies, headteachers and practitioners are being asked to do to support continuity of learning at this time, and how the actions being taken in schools and settings is being supported. We recognised that schools and settings were at different stages in developing their support for learning at home, and that supporting guidance setting out expectations across the system would be beneficial. However, the non-statutory guidance does not seek to replace existing effective practice, but has been designed to help refine and develop it further. It is not a blueprint and is not intended to dictate activity at local level, where the flexibility being afforded to schools and settings to respond to specific needs and circumstance of their learners is essential at this time. It does, however, provide a common reference point for all organisations working with and in schools and settings.

As the lockdown restrictions and associated disruption to teaching and learning have continued for far longer than was originally envisaged, a reporting process has been agreed between the Welsh Government and Regional consortia to capture both data and evidence on engagement with learning at local, regional and national levels, as well as examples of good practice that can be shared across the system. This will give real time information on provision and engagement as reported by head teachers to challenge advisors, starting this term and running for the whole period of disruption up until full-time school-based education returns. Each region will utilise local delivery mechanisms and evidence from work already undertaken by the Consortia as part of their core role and engagement in the 'Continuity of learning programme'. The first report is due to be provided to the Welsh Government before the end of June and fortnightly thereafter.

As we start to move out of the initial phase of responding to the immediate public health emergency and begin to prepare for the increased operations of schools, we will be reviewing the Continuity of learning programme to consider how it can support a blended learning approach of in school and remote learning, as at least in the immediate period, social distancing requirements will mean that

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schools will need to operate at reduced capacity.

## **SEN risk assessment guidance**

In April, we published 'Vulnerable Children and Young People: coronavirus'. The guidance set out expectations that local authorities undertake a risk assessment to determine the needs of all children and young people with a statement of SEN. The initial purpose of undertaking assessments was to determine whether children and young people with a statement of SEN would be able to have their needs met at home with support provided remotely or whether they would need a childcare placement at a hub due to their vulnerability. The guidance advises the assessments should include parents and carers, take a multi-agency approach, where appropriate, and be undertaken by local authorities or education settings, dependent on which is best placed to undertake the assessment.

## **Cancellation of the summer exams**

On 20 March the Minister for Education made a **statement** explaining that in the light of scientific and health advice and the resultant closure of schools, the summer exam series would be cancelled. In order to ensure learners affected by this decision were not affected in their progression into further or higher education or employment, grades would be calculated for GCSEs, AS levels, A levels and the Skills Challenge Certificate.

For learners due to take GCSEs and A levels this summer, grades will be awarded using centre assessed grades and rank ordering, which will then be standardised by the awarding body to ensure equity for learners. **[Read further information on this process.](#)**

For learners currently in Years 10 and 12, who have a further year of study a

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slightly different approach will be taken.

Learners in Year 10 who were due to sit exams that would have led to a whole GCSE qualification this summer will be issued a grade following the same process as learners in Year 11. However, learners in Year 10 who were due to sit units only that will lead to GCSE results next summer, will not receive estimated results. For these learners, there will be two options. They can choose to sit the units they plan to take in in summer 2021, with their overall GCSE grade calculated on the basis of that performance only. Alternatively, they can choose to sit the Year 10 units in summer 2021, along with Year 11 exams. Whichever option a learner chooses, they will be awarded the best grade from either route.

For learners in Year 12 due to take AS level this year, they will receive a calculated AS grade and there will be no AS exams until summer 2021. The calculated grade will follow the same process used for GCSE and A level awards, but it will not contribute to A level results in 2021. In summer 2021, AS learners will have two options for their A level award. They can either choose to only sit the A2 units, with the A level grade awarded solely on their performance in those units, or they can choose to sit AS and A2 units. If they choose to sit the AS units alongside the A2 units they will be awarded the best grade from either route, either the grade awarded from performance on the A2 units alone or the grade awarded from combining both AS and A2 units.

**Provisional figures** indicate that there are around 381,465 entries for individual examinations (for which there will be multiple per student) in Wales for GCSEs, AS or A levels this summer. The vast majority of those taking GCSEs (88.9% of entries) will be 16 year-olds (Year 11), and those taking AS and A levels are mostly aged 17 and 18 respectively – but some students will be younger (particularly those taking GCSEs early in Year 10 and below) or older (including those doing resits). Many of these students may also be taking other qualifications such as BTECs alongside their GCSEs and A/AS levels.

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As well as schools and colleges, these qualifications are taken in a variety of other settings including pupil referral units, providers of education other than at school, the secure estate and hospital schools, collectively, these are known as exam centres. Some students are entered for exams as “private candidates”, meaning that they have not received any teaching from the centre where they are due to sit the exams, these will include home-educated students and students who have been studying independently for re-sits. It is estimated that there are in the region of 500 private candidates.

It should be noted that similar arrangements have subsequently been made for those due to take vocational qualifications this summer, however, this is not covered within this IIA due to the breadth and variety of the vocational qualification landscape and the wide age range of learners that take these qualifications.

## **Home education statutory guidance and database regulations for local authorities**

The decision to formally pause delivery of these reforms was taken at a meeting to discuss the Welsh Government’s legislative programme on the 30 April.

As part of the prioritisation of legislative work consideration was given to the amount of resource input and the level of complexity that is involved in developing the statutory guidance and the database regulations. In addition, COVID-19 has meant that necessary engagement with LAs and LHBs and other stakeholders has been impacted and all available LA and LHB resources are now focused on maintaining critical services. This is likely to be the position for some time to come.

## Funding cuts

Responding quickly and effectively to the COVID-19 pandemic has required considerable additional expenditure across Welsh Government, in order to support this all departments were asked to re-examine their spending plans for the year and to identify savings that could be made.

During this time, when most learners are not able to attend settings and schools in person, we have looked across the education system to see how services and support can be re- configured. We have looked across all education budgets to see where savings can be made from activity that can be paused or postponed, or where natural savings will occur as a result of the restrictions in face-to-face conferences, events, professional learning and other activity. We are also having to make changes to what and how we can deliver for learners in Wales in the short term, which has resulted in funds being moved from areas that may not be able to deliver fully in the current financial year.

As a result, the Education Department has made £47 million of funding cuts to support the frontline response to the pandemic and these are detailed in the [Supplementary Budget](#) published on 27 May.

## 1.2 Long-term

The policy decisions set out above have all been necessitated by the need to act immediately to prevent or mitigate a worsening public health crisis and to support the emergency response.

However, we remain mindful of the social, developmental and well-being impacts of extended periods of disruption, and the potential isolation and trauma associated with the lockdown measures and closure of schools on the majority children, their families, the education workforce and wider communities. A range

of actions have been put in place through work on the 'evaluation and impact' underpinning principle within the Continuity of Learning programme. In collaboration with higher education institutions and other stakeholders this is seeking to monitor these impacts and research is being commissioned to seek to understand the longer term implications and how we can seek to address these.

## 1.3 Prevention

The scientific advice, as at 18 March, was that wherever possible children should be cared for in the home, with a need for overall levels of social interaction amongst society to be significantly reduced. Whilst children are not considered to be generally at high risk due to the coronavirus, they can carry and transmit the virus. As such, the repurposing of schools and settings was aimed at preventing the escalation of the pandemic to limit the numbers of people contracting the virus, to avoid overwhelming hospitals.

## 1.4 Integration

In delivering the initial education response to the pandemic, wherever possible we have sought to take an integrated approach to service delivery. This means that announcements on access to childcare arrangements for the children of critical workers and vulnerable children were made alongside those for school-age children. This recognises that critical workers would have children of varying ages, and childcare provision is often delivered on school premises.

Similarly, whilst not detailed with this IIA, a programme of work to support vulnerable children and ensure their safeguarding has been established which brings together health, social services, child care and education.

In terms of the provision for children of critical workers and vulnerable children,

either in hubs or schools, a variety of different approaches are being taken depending on local needs and circumstances however this provision is frequently bringing together a range of different staff and services. For example, we are aware of local authority staff from libraries and leisure centres supporting this provision, in some areas secondary school practitioners are looking after primary school children (or vice-versa) and at least one local authority is using play workers to support its provision.

## 1.5 Collaboration

Due to the emergency nature of the decisions, particularly the repurposing of schools, and the timescales within which they had to be made, the extent of collaboration possible has at times been limited. However, the decision to bring forward the Easter holidays and to repurpose schools was taken in consultation with the Welsh Local Government Association (WLGA), in response to local authorities and schools raising concerns about the continued viability of normal operations in light of increasing staff and learner absence.

Since this announcement, a range of collaborative arrangements have been established to plan and deliver these policy decisions. Key partners include local authorities, WLGA, the Association of Directors of Education for Wales (ADEW), Regional Consortia, the education Unions, Estyn and Qualifications Wales. We have also engaged the third sector in some areas, for example the underpinning inclusion principle of Stay Safe. Stay Learning.

We are also working in collaboration with a wide number of policy areas across the Welsh Government including Local Government, Social Services and Health, as well as the other UK administrations.

## 1.6 Involvement

The emergency nature of the response and the speed with which decisions had to be taken and implemented has meant that it has not been operationally viable to directly involve the full range of delivery partners or those affected by these decisions such as learners, their families and the workforce in some of the immediate decisions taken, such as the re-purposing of schools.

In light of this, wherever possible steps have been put in place to ensure accessible information is provided. For example regularly updated FAQs, written and oral Ministerial statements, Q&As on social media (#AskKirsty) and ministerial attendance at the Senedd CYPE Committee and the Youth Parliament.

A number of ministerial video messages have been produced throughout this period aimed at specific groups of learners, their parents and carers or the workforce, for example videos about resources that have been made available for learners in Year 13, the launch of e-Seren, or celebrating our Hwb heroes. The Minister has also participated in activity directly aimed at addressing the concerns of parents and carers such as Mumsnet live.

Every effort has been taken to communicate the changes affecting children to them in a way that they will understand.

We have also sought to ensure that mechanisms are in place to gather feedback on the impact of these policies, such as daily social media listening reports and daily summaries of key issues coming through via correspondence and enquiries to our first point of contact centre. At the early stages of the disruption, a survey was launched via DooPoll aimed at understanding the information needs of parent and carers regarding learning at home during this period, responding to the key themes that came from this a podcast was produced with teachers responding to these parental concerns.

We have also recently undertaken an online consultation survey of children and young people in Wales on the impact of coronavirus and seeking their opinions about the changes this has brought to their lives. The survey has reached approximately 23,000 children and young people aged 7-18 and includes questions about their home learning, how much COVID-19 has affected their education and how they would like their schools to keep in contact with them. We will be considering the results of this survey as part of our wider evidence base.

## Conclusion

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

As detailed in Section 1, the emergency nature of the response and the speed with which decisions have had to be taken and implemented has meant that it has not been operationally viable to directly involve delivery partners or those affected by these decisions such as learners, their families and the workforce in some of the immediate decisions taken, such as the re- purposing of schools.

In light of this, wherever possible measures have been implemented to ensure accessible information is provided for example, regularly updated FAQs, written and oral Ministerial statements, Q&As on social media (#AskKirsty) and ministerial attendance at CYPE Committee and the Youth Parliament. Multiple ministerial video messages have been produced throughout this period. The Minister has also participated in activity directly aimed at addressing the concerns of parents and carers such as Mumsnet live.

We have also sought to ensure that mechanisms are in place to gather feedback on the impact of these policies, such as daily social media listening reports and daily summaries of key issues coming through via correspondence and

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enquiries to the first point of contact centre.

We have also recently undertaken an online consultation survey of children and young people in Wales on the impact of coronavirus, seeking their opinions about the changes this has brought to their lives. The survey has reached approximately 23,000 children and young people aged 7 to 18 and includes questions about their home learning, how much COVID-19 has affected their education and how they would like their schools to keep in contact with them.

**The findings of this have recently been published.**

## **What are the most significant impacts, positive and negative?**

The impact of the pandemic, especially the protracted lock-down period, on learners, their families, the education workforce and wider community, is already significant. Therefore the impact of the policy decisions covered by this IIA are amplified and must be considered in the context of these wider significant restrictions to everyday life.

Significant negative impacts have been identified, as well as some positive impacts, primarily as a result of the decision to repurpose schools. These are broadly centred on issues with continuity of learning/development (including a lack of capacity/resources/support, potentially leading to a widening of the attainment gap) and impacts on health and wellbeing (through increased anxiety, loneliness, lack of exercise, poor nutrition etc.). These impacts are also likely to disproportionately affect marginalised and disadvantaged groups of learners, as summarised further below.

We also know the closure of schools and settings to the majority of learners is having a significant impact on parents' ability to work, with many trying to fit employment commitments around their caring responsibilities and this is having a knock-on effect on the Welsh economy, as well as parents' own health and

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well-being. As detailed in Annex C, there are also specific impacts for rural communities, such as lack of digital connectivity and loss of community focus and meeting points that schools can often provide in such communities.

There will also inevitably be financial implications for the public sector, particularly where these bodies are having to undertake additional or extra activities for example, increased cleaning costs associated with the hub provision given the increased hygiene requirements that must be met due to COVID-19.

The true picture continues to develop on a daily basis due to the changing scientific and public health advice as our understanding of COVID-19 deepens and recovery starts, as well as the emergence of new evidence and research reports both nationally and internationally. Whilst we have been able to establish a reasonably detailed understanding of the short term impact of the immediate policy decisions taken, the extent of the longer-term implications are unlikely to be known for some time, for example:

- the true extent of learning that might have been lost during this initial period of disruption with most learners not having been in school since at least the 20th March (a three month period) and how this might differ by different groups of learner, including those with protected characteristics
- the resultant impact on learners' development, particularly those in their formative years, and what this might do to the attainment gap, both now and in future years
- the longer term health and well-being implications for learners of increased social isolation, loss of school routine including the provision of physical activity and nutritional meals, and potential exposure to difficult or dangerous home environments
- the longer term impact on the education profession of the closure of schools and the provision of remote learning

What we do know from this IIA, is that the cumulative impact of the policies in



Section 1, especially the repurposing of schools, are likely to be particularly acute for certain groups of learners, these are detailed in the Children's Rights Impact Assessment in Annex A, and are summarised below:

- Vulnerable and disadvantaged learners: including those receiving free school meals, those who have English or Welsh as an additional language and those from Gypsy, Roma and Traveller communities who tend to have fewer educational opportunities beyond school. Their parents may be less likely to be prepared for distance learning, particularly where they have a limited education and/or resources themselves. There may also be a lack of capacity to participate in distance learning due to a lack of digital access, no computers, internet access issues or lack of a suitable home-learning environment. This could exacerbate the attainment gap.
- For some learners not being in the school environment can be particularly detrimental. This could be due to their home environment: alcohol or drug problems; abusive relationships; lack of tolerance of a learners' religion, gender or sexual orientation; and greater risk of online exploitation. Young carers may have difficulties in balancing continued learning from home with caring for family members, without the respite that attending school can provide. For other learners, they may not be able to access additional support they normally receive such as school counselling, THRIVE or emotion coaching. Reduced direct contact with teachers is also likely to lead to a delay in identifying children at risk and referrals to other agencies.
- Learners with Additional Learning Needs: staying at home can be more disruptive to the lives and routines of learners with additional educational needs and disabilities, particularly due to their specialist educational needs. The impact is also likely to be more significant on their families and carers, as the respite care and facilities they depend on are unavailable or their provision severely limited.

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- Ethnic minority learners: particularly those with English or Welsh as an additional language may be disproportionately impacted, similar to the issues noted for Welsh medium pupils (below), through a combination of more limited resources available to support continued learning and a limitation to parental support for continued learning at home where the parents do not speak fluent English or Welsh.
- Welsh-medium learners: here may be fewer resources available to support continued learning through the medium of Welsh, meaning these learners may be more restricted with fewer options or variety available to ensure learner engagement. There is therefore a risk that Welsh-medium schools could find re-engaging learners after the period of remote learning more challenging than their English-medium counterparts. There may also be a limitation to parental support to enable continued learning at home for pupils learning through the medium of Welsh with non-Welsh-speaking parents. This could exacerbate the impacts above and lead to pupils learning through the medium of Welsh struggling more than those learning through the medium of English. Further Welshlanguage implications are set out in Annex D.

Whilst these are all negative impacts, we also know that not being in school or another educational setting has been a positive experience for some learners and their families, for example:

- learners re-engaging with their learning in this new way of working
- extra time to spend with their close family, including families re-connecting after having spent more time together
- more time to focus on hobbies, interests, play and volunteering opportunities
- feeling more secure in their foster placements
- reduction in anxiety if they were bullied at school
- improvement in mental health through having a period to 're-set' away from stressors (bullying, difficulties in learning, anxiety around learning expectations or exams, societal pressure)

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

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

The overriding aim of all of the policy decisions detailed in Section 1 has been to support learners, their families and the education workforce, during the COVID-19 pandemic, supporting their safety and well-being in line with the Government health and scientific advice, and facilitating the emergency response to the pandemic. In doing so, these policy decisions have sought to contribute to the well-being goals of ‘a healthier’ and ‘globally responsible Wales’.

Whilst there have been inevitable, and unavoidable, impacts of responding to this crisis within extremely challenging timescales, especially the closure of schools to the majority of learners, we have sought to put measures in place to mitigate these, including:

- the repurposing of schools to make provision for the children of critical workers and vulnerable children, to support parents whose work is critical to the COVID-19 response where no other childcare is available;
- the provision of an additional £40 million to local authorities to establish local approaches to support families of children eligible for free school meals who are not able to access this support whilst schools are closed to ensure these families do not go hungry or experience additional financial hardship;
- the development of a Continuity of Learning programme to support remote learning during the period of school closures. This brings together

contributions from across education and beyond to provide support, to create and share high quality programmes for remote learning with resources to support a wide range of activities, include the provision of digital devices and supporting connectivity;

- the establishment of arrangements to calculate grades for learners due to sit exams this summer, to enable them to progress into further education or work following the cancellation of the summer exam series.

As the period of lockdown restrictions grew and our understanding of the likely implications developed, further actions have been taken to:

- either develop what were originally expected to be short term measures, for example:
  - changes to the arrangements for supporting families with children eligible for free school meals with most authorities now moving to either the provision of a food voucher or a BACS transfer
  - further development of the Continuity of Learning Programme with the production of guidance to set common expectations for schools and settings in developing their support for learning at home and the establishment of monitoring and reporting processes via the Regional Consortia to understand the level of engagement with learning and to identify and share good practice
- or to seek to mitigate the negative impacts that were becoming apparent for example:
  - the additional investment in mental health and counselling services and the development of a mental health tool kit encouraging local authorities to increase the numbers of vulnerable children attending hub provision for safeguarding reasons
  - through the range of mitigating actions detailed above, we have sought to contribute to the well-being goal of 'a more equal Wales'

Whilst the current evidence base is far from complete, we will seek to use our learning from this period and the additional evaluation and research activities we

are putting in place, as outlined in the next section, to inform and develop future policy decisions related to the pandemic such as the increased operations of schools or the arrangements that will be made for learners due to take qualifications in summer 2021.

Although this has been an extremely challenging time for all within the education sector, adapting and responding to the crisis has also brought opportunities that we are keen to retain as the recovery stage begins. These include:

- the collaborative and constructive approach that has been taken across and beyond the sector to develop resources for the Continuity of Learning Programme, to establish provision for the children of critical workers and vulnerable children, and to help informing considerations around the increased operations of schools:
  - the innovation in teaching and learning to provide remote learning, including increased digital proficiency
  - the increased focus on, and understanding of, health and well-being which will facilitate transition to the new curriculum arrangements

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

Alongside our partner organisations, we have begun analytical work to monitor and evaluate the impact of the COVID-19 crisis. Whilst these monitoring and evaluation plans are continuing to be developed as new evidence requirements are identified, policy responses are updated and additional mitigating actions are implemented, an outline of current and planned activity is provided below

Welsh Government is:

- conducting a number of rapid evidence reviews of UK and international research. The first of these focuses on impacts of crises on learner mental

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health and wellbeing, and approaches to supporting recovery. We plan to publish this review this summer. Further reviews are planned, which will support the development of the Continuity of Learning programme. Exploratory analysis of participation in remote learning, via analysis of log-on activity data

- planning support for a suite of research activities to be carried out by higher education institutions and school practitioners on the impact of the pandemic. This work will focus on future initial teacher education and upon provision in groups of schools
- considering options for commissioning a survey of school practitioners to enable us to understand in more detail their experiences of providing schooling, via different mechanisms, to pupils, to understand what has been more or less effective and why, as well as the impacts on staff workload and wellbeing
- maintaining a repository of relevant survey research and other evidence taking place in Wales, UK and more widely
- including monthly-reviewed questions in the National Survey for Wales about families' experiences of schooling
- including questions in our Wales-boost sample of Ipsos-MORI's international survey tracking public views in the crisis
- providing endorsement for applications for UKRI-funded schemes, where they will support our evidence needs. Re-configuring activity already in train before the crisis, to capture its impacts, including:
  - evaluation of the Child and Adolescent Mental Health Services (CAMHS) pilot in-reach programme (interim publication due this summer)
  - review of school and community counselling and piloting roll out of services to younger pupils
  - research to support development of implementation plans for the Youth Work Strategy.

Qualifications Wales is:

- publishing a report on the responses to their consultation on the

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arrangements for awarding grades for cancelled examinations, including principles for the standardisation model and appeals process

- researching grade standardisation models, and will be publishing a number of further outputs focusing on awards, including details of the final approach to producing grades and later in the year, an analysis of this summer's centre assessment grades, as well as an historic analysis of grades in relation to equalities characteristics
- contributing to ongoing options analysis in relation to qualifications and examinations in the 2020 to 2021 school year
- considering a number further activities to understand the impact of the arrangements put in place this year, including more analysis of centre results, and developments to their annual public confidence survey

Estyn is:

- carrying out a survey of local authorities on what is working well and the barriers and challenges that schools and local authorities are facing in delivering the Continuity of Learning Programme.
- conducting school engagement initially via telephone and then through visits into 2020 to 2021 across all school sectors, local authorities, regional consortia, initial teacher education and post-16 providers. The school engagement will focus on pupil engagement and support, and on staff, pupil and school community wellbeing
- including a thematic section in this year's Annual Report focusing on education and COVID
- conducting a survey of school leaders to understand their professional wellbeing

The outcomes from these activities will support us in better understanding the impact on learners, their families, the education profession and local communities, of COVID-19 and the initial actions taken across the education sector to respond to this public health crisis. This evidence base will allow us to review and revise policies, to identify further evidence gaps and to consider

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further mitigating action that is necessary for those who have been most adversely affected. This understanding will also support our future policy considerations, particularly those around increased operations of schools, whilst these decisions have already been taken for the summer term, future decisions will focus on arrangements for the autumn term and beyond as the public health advice suggests that disruption is likely to continue for the foreseeable future.

## **2. What are the most significant impacts, positive and negative?**

The impact of the pandemic, especially the protracted lock-down period, on learners, their families, the education workforce and wider community is significant.

We know the closure of schools and settings to the majority of learners is having a significant impact on parents' ability to work, with many trying to fit employment commitments around their caring responsibilities and this is having a knock-on effect on the Welsh economy, as well as parents' own health and wellbeing. There are also specific impacts for rural communities, such as lack of digital connectivity and loss of community focus and meeting points that schools can often provide in such communities.

The true picture continues to develop on a daily basis due to the changing scientific and public health advice as our understanding of Covid-19 deepens and recovery starts. What we do know from this IIA, is that the cumulative impact of the policies especially the repurposing of schools, are likely to be particularly acute for certain groups of learners, these are summarised below:

- Vulnerable and disadvantaged learners, including those receiving free school meals, who have English or Welsh as an additional language and those from Gypsy, Roma and Traveller communities, who tend to have fewer educational opportunities beyond school. This could exacerbate the



attainment gap.

- For some learners, not being in the school environment could be detrimental due to issues at home including alcohol or drug problems; abusive relationships; lack of tolerance of a learners' religion, gender or sexual orientation, and greater risk of online exploitation. Young carers, may also experience difficulties in balancing continued learning from home with caring for family members. For other learners, they may not be able to access additional support they normally receive such as school counselling.
- Learners with Additional Learning Needs: staying at home can be more disruptive to the lives and routines of learners with additional educational needs and disabilities, particularly due to their specialist educational needs. The impact is also likely to be more significant on their families and carers, as the respite care and facilities they depend on are unavailable or their provision severely limited.
- Ethnic minority learners, particularly those with English or Welsh as an additional language may be disproportionately impacted, similar to the issues noted for Welsh medium pupils (below), through a combination of more limited resources available to support continued learning and a limitation to parental support where the parents do not speak fluent English or Welsh.
- Welsh- medium learners: There may be fewer resources available to support continued learning through the medium of Welsh, meaning these learners may be more restricted with fewer options to ensure learner engagement. There is therefore a risk that Welsh- medium schools could find re-engaging learners after the period of remote learning more challenging than their English-medium counterparts. Also the limitation to parental support with non-Welsh-speaking parents. This could exacerbate the impacts above and lead to pupils learning through the medium of Welsh struggling more than those learning through the medium of English.

Whilst these are all negative impacts, we also know that there has been a positive experiences for some learners and their families, for example:

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- learners re-engaging with their learning in this new way of working
- extra time to spend with their close family, including families re-connecting after having spent more time together
- more time to focus on hobbies, interests, play and volunteering opportunities
- feeling more secure in their foster placements
- reduction in anxiety if they were bullied at school
- improvement in mental health through having a period to 're-set' away from stressors (bullying, difficulties in learning, anxiety around learning expectations or exams, societal pressure)

### **3. In light of the impacts identified, how will the proposal:**

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

#### **Long-term**

The policy decisions set out above have all been necessitated by the need to act immediately to prevent or mitigate a worsening public health crisis and to support the emergency response.

However, we remain mindful of the social, developmental and wellbeing impacts of extended periods of disruption, and the potential isolation and trauma associated with the lockdown measures and closure of schools on the majority children, their families, the education workforce and wider communities. A range of actions have been put in place through work on the 'evaluation and impact'

underpinning principle within the Continuity of Learning programme. In collaboration with higher education institutions and other stakeholders this is seeking to monitor these impacts and research is being commissioned to seek to understand the longer term implications and how we can seek to address these.

## Prevention

The scientific advice, as at 18 March, was that wherever possible children should be cared for in the home, with a need for overall levels of social interaction amongst society to be significantly reduced. Whilst children are not considered to be generally at high risk due to the coronavirus, they can carry and transmit the virus. As such, the repurposing of schools and settings was aimed at preventing the escalation of the pandemic to limit the numbers of people contracting the virus, to avoid overwhelming hospitals.

## Integration

In delivering the initial education response to the pandemic, wherever possible we have sought to take an integrated approach to service delivery. This means that announcements on access to childcare arrangements for the children of critical workers and vulnerable children were made alongside those for school-age children. This recognises that critical workers would have children of varying ages, and childcare provision is often delivered on school premises.

Similarly, whilst not detailed with this IIA, a programme of work to support vulnerable children and ensure their safeguarding has been established which brings together health, social services, child care and education.

In terms of the provision for children of critical workers and vulnerable children, either in hubs or schools, a variety of different approaches are being taken

depending on local needs and circumstances however this provision is frequently bringing together a range of different staff and services. For example, we are aware of local authority staff from libraries and leisure centres supporting this provision, in some areas secondary school practitioners are looking after primary school children (or vice-versa) and at least one local authority is using play workers to support its provision.

## **Collaboration**

Due to the emergency nature of the decisions, particularly the repurposing of schools, and the timescales within which they had to be made, the extent of collaboration possible has at times been limited. However, the decision to bring forward the Easter holidays and to repurpose schools was taken in consultation with the Welsh Local Government Association (WLGA), in response to local authorities and schools raising concerns about the continued viability of normal operations in light of increasing staff and learner absence.

Since this announcement, a range of collaborative arrangements have been established to plan and deliver these policy decisions. Key partners include local authorities, WLGA, the Association of Directors of Education for Wales (ADEW), Regional Consortia, the education Unions, Estyn and Qualifications Wales. We have also engaged the third sector in some areas, for example the underpinning inclusion principle of Stay Safe. Stay Learning.

We are also working in collaboration with a wide number of policy areas across the Welsh Government including Local Government, Social Services and Health, as well as the other UK administrations.

## **Involvement**

The emergency nature of the response and the speed with which decisions had

to be taken and implemented has meant that it has not been operationally viable to directly involve the full range of delivery partners or those affected by these decisions such as learners, their families and the workforce in some of the immediate decisions taken, such as the re-purposing of schools.

In light of this, wherever possible steps have been put in place to ensure accessible information is provided. For example regularly updated FAQs, written and oral Ministerial statements, Q&As on social media (#AskKirsty) and ministerial attendance at the Senedd CYPE Committee and the Youth Parliament.

A number of ministerial video messages have been produced throughout this period aimed at specific groups of learners, their parents and carers or the workforce, for example videos about resources that have been made available for learners in Year 13, the launch of e-Seren, or celebrating our Hwb heroes. The Minister has also participated in activity directly aimed at addressing the concerns of parents and carers such as Mumsnet live.

Every effort has been taken to communicate the changes affecting children to them in a way that they will understand.

We have also sought to ensure that mechanisms are in place to gather feedback on the impact of these policies, such as daily social media listening reports and daily summaries of key issues coming through via correspondence and enquiries to our first point of contact centre. At the early stages of the disruption, a survey was launched via DooPoll aimed at understanding the information needs of parent and carers regarding learning at home during this period, responding to the key themes that came from this a podcast was produced with teachers responding to these parental concerns.

We have also recently undertaken an online consultation survey of children and young people in Wales on the impact of coronavirus and seeking their opinions about the changes this has brought to their lives. The survey has reached

approximately 23,000 children and young people aged 7-18 and includes questions about their home learning, how much COVID-19 has affected their education and how they would like their schools to keep in contact with them. We will be considering the results of this survey as part of our wider evidence base.

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

Alongside our partner organisation, Qualifications Wales, we have begun analytical work to monitor and evaluate the impact of the COVID-19 crisis. Whilst these monitoring and evaluation plans are continuing to be developed as new evidence requirements are identified, policy responses are updated and additional mitigating actions are implemented, an outline of current and planned activity is provided below

Welsh Government is:

- conducting a number of rapid evidence reviews of UK and international research. The first of these focuses on impacts of crises on learner mental health and wellbeing, and approaches to supporting recovery. We plan to publish this review this summer<sup>16</sup>. Further reviews are planned, which will support the development of the Continuity of Learning programme
- conducting exploratory analysis of participation in remote learning, via analysis of log-on activity data
- planning support for a suite of research activities to be carried out by higher education institutions and school practitioners on the impact of the pandemic. This work will focus on future initial teacher education and upon provision in groups of schools
- considering options for commissioning a survey of school practitioners to enable us to understand in more detail their experiences of providing schooling, via different mechanisms, to pupils, to understand what has been

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more or less effective and why, as well as the impacts on staff workload and wellbeing;

- maintaining a repository of relevant survey research and other evidence taking place in Wales, UK and more widely including monthly-reviewed questions in the National Survey for Wales about families' experiences of schooling, including questions in our Wales-boost sample of Ipsos-MORI's international survey tracking public views in the crisis;
- providing endorsement for applications for UKRI-funded schemes, where they will support our evidence needs
- re-configuring activity already in train before the crisis, to capture its impacts, including:
  - evaluation of the Child and Adolescent Mental Health Services (CAMHS) pilot in-reach programme (interim publication due this summer<sup>1</sup>)
  - conducting a review of school and community counselling and piloting roll out of services to younger pupils
  - conducting research to support development of implementation plans for the Youth Work Strategy

Qualifications Wales is:

- publishing a report on the responses to their consultation on the arrangements for awarding grades for cancelled examinations, including principles for the standardisation model and appeals process,
- researching grade standardisation models, and will be publishing a number of further outputs focusing on awards, including details of the final approach to producing grades and later in the year, an analysis of this summer's centre assessment grades, as well as an historic analysis of grades in relation to equalities characteristics.
- contributing to ongoing options analysis in relation to qualifications & examinations in the 2020/21 school year
- considering a number further activities to understand the impact of the arrangements put in place this year, including more analysis of centre results, and developments to their annual public confidence survey

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Estyn is:

- carrying out a survey of local authorities on what is working well and the barriers and challenges that schools and local authorities are facing in delivering the Continuity of Learning Programme
- conducting school engagement initially via telephone and then through visits into 2020 to 2021 across all school sectors, local authorities, regional consortia, initial teacher education and post-16 providers. The school engagement will focus on pupil engagement and support, and on staff, pupil and school community wellbeing
- including a thematic section in this year's Annual Report focusing on education and COVID-

The National Academy of Educational Leadership is:

- conducting a survey of school leaders to understand their professional wellbeing

The outcomes from these activities will support us in better understanding the impact on learners, their families, the education profession and local communities, of COVID-19 and the initial actions taken across the education sector to respond to this public health crisis. This evidence base will allow us to review and revise policies, to identify further evidence gaps and to consider further mitigating action that is necessary for those who have been most adversely affected. This understanding will also support our future policy considerations, particularly those around increased operations of schools, whilst these decisions have already been taken for the summer term, future decisions will focus on arrangements for the autumn term and beyond as the public health advice suggests that disruption is likely to continue for the foreseeable future.

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