

Consultation on the Curriculum and Assessment (Wales) Bill

Evidence submitted to the [Children, Young People and Education Committee](#) for Stage 1 scrutiny of the Curriculum and Assessment (Wales) Bill.

About you

Organisation: Qualifications Wales

1. The Bill's general principles

1.1 Do you support the principles of the [Curriculum and Assessment \(Wales\) Bill](#)?

Yes

1.2 Please outline your reasons for your answer to question 1.1

(we would be grateful if you could keep your answer to around 1500 words)

Qualifications Wales welcomes this opportunity to contribute to the CYPEC's inquiry into the general principles of the Curriculum and Assessment (Wales) Bill ('the Bill').

We support the case for a new, purpose-led curriculum and the principles for developing legislation to introduce it.

I. Our work to support the new curriculum

Since Qualifications Wales was established in 2015, we have maintained a close interest in Welsh Government's work to develop a new curriculum framework for Wales.

We have taken the proposed new curriculum as a catalyst for looking at how qualifications taken by 14 to 16-year-olds will need to change to support the purposes and aims of the new Curriculum for Wales, and to adapt and respond to future needs.

We want 16-year-olds to take globally respected qualifications that inspire and prepare them for life, learning and work. This means that secondary schools and other publicly funded providers should be able to choose from a range of qualifications that:

- command public confidence, with currency in Wales, the UK and globally;
- secure an equitable, coherent, and bilingual choice for centres and learners;
- make the most of digital technology; and
- can be introduced in a managed and sustainable way

In light of the challenges posed by the Covid-19 pandemic this work offers an important opportunity to:

- Look at alternative assessment methods and approaches;
- Consider the potential impact that qualifications can have on the wellbeing and mental health of learners;
- And to drive innovation and resilience in the qualifications system, for example through more effective and widespread use of digital technology.

We are committed to working collaboratively and transparently so that everyone can have their say on future qualifications and to help schools and others to design and implement their curricula effectively.

In June this year, following a public consultation, we confirmed our high level approach to shaping the future qualifications for 16-year-olds in Wales. We also published advice to the Minister for Education on our proposed approach. Our advice draws on the feedback to our consultation and considers the key challenges, opportunities, dependencies and assumptions we expect to see. For a more detailed discussion of our views on developing qualifications to support the new curriculum we suggest committee members may want to refer to our published advice in full (<https://qualificationswales.org/media/6022/advice-to-the-minister-for-education.pdf>).

A full analysis of responses to the consultation, a summary of findings and a youth-friendly version report on the consultation outcomes are also available on our website (<https://qualificationswales.org/english/qualified-for-the-future/phase-1---shaping-our-approach/>).

We are now preparing for a further round of consultations that will focus on:

- The main qualifications that should form part of the future offer for 16-year-olds.
- What future GCSEs should look like and the subject areas in which they can be offered

- And the qualifications required to support the single continuum for learning Welsh.

II. The new curriculum and qualifications

Given our role as qualifications regulator, we have a specific interest in the provisions of the Bill that relate to curriculum expectations for learners aged 14 to 16. That said, we fully recognise that the new curriculum is based on a concept of a single continuum of progression from 3 – 16. Through our work we will be considering how the overall range of qualifications available can support all learners, whatever progression point they have reached and are aiming for.

The proposed Curriculum for Wales clearly sets out the underpinning knowledge, skills and experiences that learners should gain from following a broad and balanced curriculum from the ages of 3 to 16. These expectations are described through the:

- four purposes
- six Areas of Learning and Experience (AoLE)
- three cross-curricular skills
- four mandatory curriculum elements (Welsh, English, Religion, Values and Ethics, and relationships and sexuality education)
- four integral skills
- and the twenty-seven statements of what matters.

The Bill does not set expectations for the role that qualifications should play in relationship to the curriculum. We agree with this approach. We have not yet determined which qualifications should be available to the first learners to be educated under the new curriculum framework. Neither have we agreed how future qualifications should be designed and assessed. These are questions we will be exploring in forthcoming consultations.

Within the parameters set by the framework, headteachers are expected to design a broad and balanced local curriculum for their school that provides for appropriate progression for learners of differing ages, abilities and aptitudes. In secondary schools, the curriculum must also offer learners in Year 10 and Year 11 a choice of teaching and learning within each AoLE, while ensuring that they continue to undertake some learning in each AoLE.

The new curriculum framework is about much more than qualifications and covers all the learning and experiences that will help learners to realise the four purposes. However, the range of qualifications available to 16-year olds, the way in which they are assessed (as well as how their outcomes are used to evaluate school performance) will necessarily have an important bearing on the teaching and learning that takes place in secondary schools. Our position is that qualifications should support the curriculum, not the other way around. As far as possible, we want the qualifications available to give secondary schools the flexibility they need to design local curricula that are right for their learners.

Qualifications will need to continue to evolve and adapt to help support schools in doing this. If the Bill were to describe or prescribe the relationship between qualifications and the curriculum, this would likely limit the flexibility that the future range of qualifications could offer schools to develop their own curricula.

III. School evaluation and improvement

The explanatory memorandum to the Bill notes that the Successful Futures review found that

‘The high degree of prescription in the current curriculum has tended to create a culture where creativity has been diminished. There has been a narrowing of teaching and learning, with the professional contribution of the workforce underdeveloped.’

In our experience this narrowing of the curriculum taught in schools is compounded by the dominance of qualification outcomes in school accountability arrangements. We welcome the work already started by Welsh Government to develop new evaluation and improvement arrangements that will support the implementation of the new curriculum framework. We particularly support the intention to develop an approach that requires a wider variety of factors and evidence to be considered when evaluating school performance and setting priorities for improvement.

We also support the proposal in the Bill for Welsh Ministers to be able to specify further curriculum requirements for the 14-16 age range by making provision relating to courses of study’. Historically, school accountability and performance measures have been used to influence schools’ decision about the qualifications they offer; an approach which has often led to unintended consequences. Giving Welsh Ministers the ability to make direct provisions about the courses of study that schools offer seems to us a more transparent

means of setting and implementing policy expectations in relation to the qualifications offered to and taken by learners.

1.3 Do you think there is a need for legislation to deliver what this Bill is trying to achieve?

(we would be grateful if you could keep your answer to around 500 words)

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2. The Bill's implementation

2.1 Do you have any comments about any potential barriers to implementing the Bill? If no, go to question 3.1

(we would be grateful if you could keep your answer to around 500 words)

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2.2 Do you think the Bill takes account of these potential barriers?

(we would be grateful if you could keep your answer to around 500 words)

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3. Unintended consequences

3.1 Do you think there are there any unintended consequences arising from the Bill? If no, go to question 4.1

(we would be grateful if you could keep your answer to around 500 words)

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4. Financial implications

4.1 Do you have any comments on the financial implications of the Bill (as set out in Part 2 of the [Explanatory Memorandum](#))? If no, go to question 5.1

(we would be grateful if you could keep your answer to around 500 words)

We have worked with Welsh Government officials to help quantify our costs associated with reviewing and reforming qualifications to ensure they support the new curriculum.

In addition to the costs noted in the RIA, there are likely to be further costs incurred by awarding bodies from the work required to develop new qualifications to meet our updated requirements. The costs involved will vary depending on the nature and scale of changes required to ensure that qualifications can support the new curriculum and meet the needs of future learners.

Depending on the scale of changes required, there could be a potential need to make additional grant funding available to awarding bodies to help secure the availability of a sufficiently broad range of bilingual qualifications to meet the needs of all learners.

5. Powers to make subordinate legislation

5.1 Do you have any comments on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the [Explanatory Memorandum](#)). If no, go to question 6.1.

(we would be grateful if you could keep your answer to around 500 words)

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6. Other considerations

6.1 Do you have any other points you wish to raise about this Bill?

(we would be grateful if you could keep your answer to around 1000 words)

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