

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: NDNA Cymru (National Day Nurseries Association 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)

NDNA Cymru support the principles of the Curriculum and Assessment (Wales) Bill and believe they are necessary in order to move away from the overall narrow outdated arrangements that are currently in use within Wales, and move towards an education fundamental for 21st century learners.

NDNA Cymru believe that as the principles of the Foundation Phase curriculum feed into new Curriculum for Wales, such as the commitment to learning through experience and the strong pedagogy (as determined by Professor Donaldson's research) it is essential to see the requirement for holistic and child centred learning also remain a focus within the bill. NDNA Cymru believe within the headings of 'The Four Purposes' there is visible intent to build upon the success of the Foundation Phase throughout a child's learning and ensure the curriculum can evolve with the modern world and provide children and young people with the strong foundations to be healthy, confident, resilient individuals with lifelong learning skills. NDNA Cymru believe that the bill is successful in highlighting the new aims of education in Wales; to prepare children to thrive in a future where digital skills, adaptability, and creativity are crucial, rooted in Welsh values and culture.

NDNA Cymru believe that a focus on improved and consistent assessment procedures within the bill, will facilitate better outcomes for children and young people. Assessment does not facilitate better outcomes alone, and NDNA Cymru are pleased to see a focus within the Curriculum and Assessment Bill on the review of progress, the next steps and the teaching and learning support, that will be required to achieve progress as a continuous part of a child's learning and development.

NDNA Cymru believe that the design and use of a continuum of learning within the bill helps further support the child centred approach to learning. Although, NDNA Cymru feel that this will require provision for the use of consistent language across all agencies and stages, to ensure confidence in the sharing of information between professionals to positively impact upon the outcomes for the child's learning. When considering this partnership working within the sector, NDNA Cymru believe that the use of a continuum supports children's transitions throughout their learning and development, however, where transitions are mentioned, there is no mention of the transition between funded non-maintained settings (FNM) and schools. We believe that this misses a crucial opportunity, not only to highlight the importance of reviewing a learner's progression of learning at every stage of their learning to support better future outcomes, but also to denote the responsibility of overseeing the transition and ensuring future planning for the child refers to prior progress of learning.

NDNA Cymru are pleased to see that the Welsh Government have recognised that childcare settings funded to deliver early education for 3 and 4 year olds, unlike schools, do not always have the resources or capacity to develop curriculum and assessment arrangements individually. NDNA Cymru welcome to plan to develop curriculum arrangements for the sector and the plan to engage closely with the sector and early year's education practitioners to develop and design the curriculum and assessment arrangements for FNM to ensure it is fit for purpose. NDNA Cymru is also pleased to see the plan for a professional learning programme to be delivered to the sector when the curriculum is published.

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)

Yes, NDNA Cymru believe that legislation is required to provide a solid infrastructure and clear strategic direction and responsibility across the education sector within Wales. We also believe that legislation will help to secure consistent and proportionate funding to support effective delivery. NDNA Cymru believes that the Welsh Government review of aligning funding for the Foundation Phase alongside the Childcare Offer is important for ensuring the ongoing sustainable delivery of high quality early education in all settings.

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)

NDNA Cymru believe a potential challenge to the successful delivery of the Bill could lie around the development of the central/s13 curriculum for FNM settings. If this is developed without active and effective engagement with the sector (those practitioners that will be required to deliver it) and professionals it could be a missed opportunity to make the most of the reforms. NDNA Cymru believe that the development of the FNM curriculum should be done with the sector not for the sector.

NDNA Cymru believe that initially at the roll out stage of the new Curriculum for Wales, the majority of practitioners within FNM settings will opt to use the section 13 curriculum as opposed to designing their own. NDNA Cymru believe that this is a reflection of the infrastructure settings do not have akin to schools to develop curricula. However, FNM practitioners have the skills and knowledge to adapt a supplied curriculum to the needs of an individual learner. NDNA Cymru believe that once the settings have successfully delivered the new curriculum over a matter of terms/years, they will build upon their adaptations and eventually re-design the curriculum themselves to truly suit their learners and their setting- the basis of the new approach to education within Wales.

NDNA Cymru believes that the expectation for FNM settings to deliver equally high quality early years' education requires the support stated in within the bill for practitioners, should be equal to that of support offered to teachers within the maintained settings and schools. NDNA Cymru believe that currently, the training offered and delivered to the FNM settings has been disproportionate to that delivered to schools and maintained settings and has greatly varied across the local authorities and regional consortia within Wales. NDNA Cymru welcome the commitment to support FNM settings with the implementation of the

curriculum and assessment arrangements by a professional learning programme, however NDNA Cymru have some concerns with distribution of support and training across all childcare settings, the capacity of existing local authority early year's teams and the training and support that is offered being inaccessible to the FNM workforce.

NDNA Cymru believe that professional development and funding provided to the FNM sector should be proportionate for the work and level of responsibility involved in delivering good quality early years education in order to have a high impact on the learning and development outcomes of the children.

Currently, Foundation Phase Nursery funding received by FNM settings varies greatly across Wales and, in the majority of local authorities, falls much lower than the funding received for the Childcare Offer for Wales, a poor reflection of the effort and commitment that goes into delivering high quality early years education. NDNA Cymru believes that standardisation of funding, resources and support offered to the non-maintained sector to deliver early year's education would further drive up standards of education received by all children aged 3-4 years in Wales and support the value of early education across the sector and with parents and families, providing a more substantial foundation for learning and securing a more successful future for children and young people.

NDNA Cymru hold some concerns about the timeline established for FNM settings with regards to the publication of the FNM curriculum, the roll out of the professional learning program and the planned delivery date for the curriculum to still remain September 2022. The childcare sector is vast and, as touched upon above, NDNA Cymru believe that training would need to be delivered in a range of options to be truly inclusive. We believe there is also a requirement, to ensure that re-fresher courses and follow –up support are offered with a rolling calendar to support the high staff turnover observed in the early year's sector. NDNA Cymru's workforce survey in 2019 found that staff turnover was around 20%. Follow up support could be offered online to provide a blended learning approach for professionals/practitioners. This blended and comprehensive learning approach would ensure its full benefit has an impact on the learning and development outcomes of the children. However, NDNA Cymru are concerned that the time between publication of the FNM curriculum and roll out of the New Curriculum for Wales in September 2022 may put restrictions of the training delivered to and accessed by FNM settings and their practitioners.

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)

NDNA Cymru believe that the Bill clearly states the role of the Welsh Government in supporting FNM settings with the development of the curriculum itself, however, NDNA Cymru acknowledge that within the review of the financial implications of the bill, FNM settings are omitted from the contents of the bill itself. The detail surrounding the both the professional development and funding to support FNM setting in the successful delivery of the curriculum is not clear and further clarification needs to be made within the bill itself.

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)

NDNA Cymru believes that one large unintended consequence of the bill, as mentioned previously, is the omission of the requirement to engage with the sector in the development of the FNM curriculum and assessment arrangements. The risks that this omission presents is a curriculum that is not fit for purpose across the entire range of varied FNM settings.

NDNA Cymru believe that if commitments to the professional learning of FNM settings is not detailed within the bill, it poses a risk to the consistency and quality of educational provision across the early year's sector. NDNA Cymru believe that this could cause gaps in the sector where some settings are able to access self-sourced or self-funded training and others do not have the same opportunity. NDNA Cymru believe that all educational settings should have the ability to access support and professional learning that correlates to the responsibilities put upon them and outcomes expected of them.

NDNA Cymru believe that the Curriculum and Assessment (Wales) Bill compliments existing legislation that provides rights for Welsh speakers to receive Welsh-language services and supports the Welsh Government's Cymraeg 2050 Strategy to achieve the target of a million Welsh speakers by 2050. NDNA Cymru believe that the bill will have a positive impact on learners in Welsh medium settings in support of focusing their Welsh language acquisition. For all settings, NDNA Cymru believe that the removal of the differentiation of 'first language' and 'second language' learning will also further support

the Cymraeg 2050 strategy. Although, we believe the same support and guidance stipulated for the FNM sector, needs to be provided successfully through both languages.

NDNA Cymru agree with the contents of section 27 where in the Disapplication of English as a mandatory element: funded non-maintained nursery education the responsibility of application lies with the setting themselves as they are best placed to determine their position and level of Welsh language provision within their setting. NDNA Cymru believe that careful consideration also needs to be given during the production of the FNM curriculum to ensure it facilitates effective use and development of the Welsh language in line with the requires in the bill. NDNA Cymru hold concerns regarding consideration being given to the availability of funding to provide additional resources to offer a truly bilingual learning experience for learners in the early years, akin to what will be offered to those attending schools and maintained settings.

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)

NDNA Cymru are pleased to see the commitment of a professional learning programme for the FNM sector to support implementation of the curriculum and assessment arrangements. However, we have concerns that further cost implications within the FNM are not considered. As mentioned previously, this costs could include the disparity between funding rates across Wales which can affect the education provision. NDNA Cymru agrees that although the new curriculum reflects the Foundation Phase principles and pedagogy and within most settings, therefore significant changes in approach will not be required, we believe there is also a requirement, to ensure that resources and support are proportionate by those received in schools and maintained settings. NDNA Cymru would also like to see the commitment to also fund further development of the workforce through re-fresher courses and follow –up support, to offset the high staff turnover observed in the early year’s sector and ensure truly effective implementation.

As also previously mentioned, NDNA Cymru hold concerns regarding the capacity of existing early year’s schemes to support settings. NDNA Cymru are aware of some local authorities streamlining their training pathways to ensure better access universally within

the sector, however, we would like to see this approach further improved by the amalgamation of training between the early year's practitioners in non-maintained settings and staff and practitioners within schools and maintained settings. This approach would not only support funding restraints, but also improve cohesion of application and partnership working between settings and schools, which would positively impact children's transitions.

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)

NDNA Cymru believe that this change within education in Wales is an excellent opportunity to ensure cohesion of application across all local authorities and support parental choice. We are aware that within some local authorities in Wales, the delivery of education for 3 and 4 years olds is restricted solely to schools and maintained settings only. NDNA Cymru believe that if the Welsh Government were to review the current funding and support streams within the education of 3 and 4 year olds across Wales to align them in preparation for the new curriculum, consideration would need to be made regarding areas where restrictions on delivery are present.

