
Ymateb i Ymgynghoriad / Consultation Response

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Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Introduction

Estyn strongly agrees that any future qualifications taken at 16 should relate to and support the new curriculum for Wales, and that all qualifications that are developed specifically for Wales are made available to learners in both Welsh and English. We agree that it is important for Qualifications Wales to ensure that centres offer an equitable and coherent range of qualifications for all learners. As education in Wales is undergoing significant reform, we agree that the benefits of keeping the GCSE brand name outweigh any shortcomings. Keeping the brand would help to maintain public confidence during a period of significant change. Any new qualifications should support the implementation of the new curriculum. We do not think that wider skills should be assessed in a new stand-alone qualification and agree that the Skills Challenge Certificate has the potential to provide young people with the experiences and opportunities to develop the critical thinking and other skills important for further education and lifelong learning.

Guiding principles to help shape the qualification offer

In section 5 of the consultation document, we outline a set of guiding principles that we propose applying when deciding which qualifications taken at 16 are eligible for public funding.

Qualifications Wales should take steps to ensure that publicly funded qualifications taken at 16 relate to, and support, the new curriculum for Wales. To what extent do you agree with this proposal?

- Strongly agree
- Agree
- Partly agree and partly disagree
- Disagree
- Strongly disagree
- Unsure

Estyn strongly agrees that any future qualifications taken at 16 should relate to, and support, the new curriculum for Wales. These qualifications should also be relevant and provide clear pathways for learners to progress to academic, technical and vocational routes post-16. We anticipate this would involve close working between Qualifications Wales, Welsh Ministers and the Commission for Tertiary Education and Research to ensure that there is coherent join-up between qualifications developed for the new curriculum and the new PCET landscape.

Qualifications Wales should require awarding bodies to make all publicly funded qualifications taken at 16 available in both Welsh and English. To what extent do you agree with this proposal?

- Strongly agree
- Agree
- Partly agree and partly disagree
- Disagree
- Strongly disagree
- Unsure

Please explain your answer in the space below.

*(In your response you may want to consider a) The benefits and challenges for you or your organisation and
b) Any specific circumstances when this principle should not be applied).*

Estyn strongly agrees that all qualifications that are developed specifically for Wales are made available to learners in both Welsh and English. We also agree that where qualifications have been developed elsewhere, but are eligible for public funding in Wales, that Qualifications Wales should ensure that awarding bodies to offer them in both languages. In order to increase the availability of some qualifications, particularly vocational qualifications in Welsh, Qualifications Wales may need to consider further incentives to compensate for a smaller market.

It is essential that all qualifications are offered bilingually to meet the need of the Welsh Government policy of 'Cymraeg 2050: A Million Welsh Speakers'. It is vital that bilingual resources are produced and released at the same time as this has caused concern among teachers who teach through the medium of Welsh. Where resources are not available in both languages at the same time, this can have an impact on teachers' workload.

There should be an appropriate choice of qualifications, across different levels and in Welsh and English, to meet the needs of all learners and opportunity to secure a more equitable balance of Welsh language and English language provision for 16-year-olds in Wales.

It would also be useful to consider how we make the system responsive to needs identified by education providers. Where centres identify a gap in qualifications or a qualification that has not been designed in Wales, for Wales, that may be appropriate for their learners' interests and needs, we develop a clear process for exploring how the qualification is identified as being eligible and made available for learners in a timely way. This is particularly the case for vulnerable learners in PRUs for example.

Qualifications Wales should more closely manage the range of publicly funded qualifications that centres can offer to 16-year-olds to make sure it is equitable and coherent. To what extent do you agree with this proposal?

- Strongly agree
- Agree
- Partly agree and partly disagree

- Disagree
- Strongly disagree
- Unsure

Please explain your answer in the space below.

(In your response you may want to consider a) The benefits and challenges for you or your organisation and

b) Any specific circumstances when this principle should not be applied).

Estyn agrees that it is important for Qualifications Wales to ensure that centres offer an equitable and coherent range of qualifications. Qualifications at all levels should be relevant to the new curriculum and align with its principles. Awarding bodies need to show how a qualification relates to and supports the purposes and aims of the new curriculum when seeking eligibility for public funding.

An important aspect of developing coherent and equitable qualifications is considering how they can influence teaching and learning. It is a cause for concern when teachers focus mainly on ‘teaching to the test’. Qualifications become counterproductive when the predictability of assessment and marking conventions lead teachers to rely too heavily on teaching to the test. They can focus overly on examination board tips and strategies over and above securing genuine understanding, knowledge and skills. The design of future qualifications must draw on an appropriate and less predictable range of assessment methods to support less teaching to the test. Overall, assessment arrangements should be manageable and robust. Assessments provide many pupils with tangible targets and therefore bring valuable motivation.

Currently, there are some qualifications available which can be completed in far less curriculum time than the stated guided learning hours. We strongly support a review of these qualifications, particularly to consider patterns and trends in the uptake of these qualifications. There is a danger that they may be seen as ‘easier’ qualifications with high point scores available, despite there being no external assessment.

As new qualifications are designed, it is important to remember that they are likely to influence teaching behaviours. It is desirable, therefore, to design qualifications that are not only equitable and coherent, but encourage teachers to use a wide range of engaging and relevant teaching approaches to provide pupils with meaningful experiences that lead to high quality learning.

We believe that it is important to ensure that qualifications are fully inclusive and provide opportunities for all young people, including those with SEN or those who are not in mainstream education to gain meaningful qualifications that help them progress.

Are there any other principles you think we should consider when deciding which qualifications to make eligible for public funding for 16-year-olds in Wales?

Please explain your answer in the space below.

Across Wales, many schools are facing budget cuts and an important consideration is the cost of qualifications, associated resources and professional learning. Increased examination entry costs can have unintended consequences for learners, as schools may become reluctant to enter pupils who are not guaranteed to achieve well. Schools report that they are facing an increase in their examination entry costs and there is a need to ensure that all qualifications represent good value for money.

It would be helpful to give some consideration to how well a qualification provides an appropriate foundation for future learning pathways. For example, it would be helpful to consider what qualifications at 16 would prepare learners appropriately to move onto further courses at post-16.

GCSEs fit for the future

In section 6 of the consultation document, we outline our proposal to retain the GCSE name while redesigning them so that they meet our vision for qualifications and support the aims and purposes of the new curriculum.

On balance, we think that the GCSE name should be retained for the redesigned qualifications that will form a central part of the qualification offer for 16-year-olds in Wales. To what extent do you agree with this proposal?

- Strongly agree
- Agree
- Partly agree and partly disagree
- Disagree
- Strongly disagree
- Unsure

Please explain your answer in the space below.

As education in Wales is undergoing significant reform, we agree that the benefits of keeping the GCSE brand name outweigh any shortcomings in at least the short and medium term.

GCSEs are the most well-known and well-established brand of qualification taken by 16-year-old learners in Wales. They are understood and recognised by a wide range of stakeholders including parents, employers and universities. Keeping the brand would help to maintain public confidence during a period of significant change.

We feel that retaining the GCSE brand will allow for some continuity in the education system at a time of significant change. The content, format and style of GCSEs can be adapted to meet the needs of learners without changing the brand name.

However, it is important to strengthen communication around GCSEs to clarify that they are qualifications designed for pupils in Year 10 and Year 11 and are not intended for younger learners (Year 9 or below). The disadvantages of asking learners to make option choices at the end of Year 8 must be made clear to all providers.

Do you have any specific suggestions for how GCSE qualifications could change to meet our vision and to support the aims and purposes of the new curriculum?

Please explain your answer in the space below.

In general, there is still a need for 14-16 qualifications. We believe that these qualifications should be created to support the new curriculum. When introducing new qualifications, Qualifications Wales should consider any unintended consequences on teacher workload and well-being that changes could bring if not well-managed or if there is insufficient communication or timely support. In developing new qualifications, Qualifications Wales should minimise the element of predictability in the assessment arrangements to avoid the potential for teachers to 'second guess' the assessment and teach to the test.

In its response to Welsh Government's curriculum consultation, we emphasised the importance of Welsh Government establishing new lower stakes accountability arrangements. This, alongside a clear guidelines on the range of qualifications to be offered or taken, is key to supporting these changes.

Although they have assessed practical skills, GCSEs have not traditionally reached into wider, more vocational aspects of learning. Consideration needs to be given as to how a better mix of vocational and academic qualifications can be offered to 14-16 year old learners. The consultation makes clear that GCSEs will not be the only qualification available, but there is an opportunity to develop vocational GCSE qualifications. If this mixture of GCSEs is taken forward, there may be work needed to raise awareness and understanding of these changes, while retaining the strength of the brand.

It will be important to engage the wider workforce including schools and post-16 providers in the design of any new vocational qualifications.

A qualification to assess wider skills

In section 7 of the consultation document, we outline our proposal to retain a specific qualification that supports the development and assessment of the wider skills (as defined in the new curriculum). These are: creativity and innovation, critical thinking and problem solving, planning and organising, and personal effectiveness.

On balance, we think that a specific qualification that supports the development and assessment of the wider skills (as defined in the new curriculum) should be part of the qualification offer for 16-year-olds in Wales.

To what extent do you agree with this proposal?

- Strongly agree
- Agree
- Partly agree and partly disagree
- Disagree
- Strongly disagree
- Unsure

Please explain your answer in the space below.

Overall, we do not think that wider skills should be assessed in a new stand-alone qualification and agree that the Skills Challenge Certificate has the potential to provide young people with the experiences and opportunities to develop or refine the critical thinking and other skills important for further education and lifelong learning and support the embedding of the four purposes.

Generally in the past, where wider skills have been assessed through stand-alone qualifications, these qualifications have received poor feedback from pupils and teachers because of repetition and workload. Introducing new, specific qualifications to support the development and assessment of all the wider skills would require a significant shift in approach within the education sector. Assessing pupils' wider skills is important but there is the potential for unintended consequences if the qualifications are seen as less rigorous, especially if there is a large proportion of a non-examined assessments. The consultation recognises that building on the Skills Challenge Certificate as the vehicle to assess the wider skills does not prevent these skills from also being embedded in other qualifications. It will be important to consider how new qualifications could also contribute to the assessment of young people's application of wider skills in different contexts.

Attributes that feature as part of the four purposes, such as creativity and innovation, critical thinking and problem solving, planning and organising, and personal effectiveness are difficult to measure. Careful consideration needs to be given to whether these elements should be assessed and, if so, how. The degree to which practical work, including group/team work, contribute to qualification outcomes should be reviewed. These aspects should contribute towards existing qualification outcomes where appropriate.

Do you have any specific suggestions for how the Skills Challenge Certificate at key stage 4 could change to meet our vision and support the aims and purposes of the new curriculum?

Please explain your answer in the space below.

The Skills Challenge Certificate has the potential to provide young people with the experiences and opportunities to develop or refine the critical thinking and other skills important for further education and lifelong learning and support the embedding of the four purposes. However, despite many strengths, its current structure and assessment arrangements have led to repetition and overassessment of the

challenges at the expense of the development of wider skills. There has been too much duplication in the Skills Challenge Certificate and pupils report that they are not always clear about the purpose of activities.

Teaching the skills challenges requires a different set of skills from those needed to teach other GCSE qualifications. In a majority of schools, teachers understand how to organise pupils' project work and plan suitably to use pupils' skills. However, the ability and confidence of teachers in developing pupils' wider skills are too variable. Any changes to the Skills Challenge Certificate to make it more appealing to pupils and to support Curriculum for Wales need to be supported with appropriate professional learning for teachers delivering. For example, by developing stronger partnerships with employers, colleges and training providers in the local community, schools could enhance learners' creative, entrepreneurial and employability skills by creating real life, authentic contexts and experiences for learners.

Impact assessments

In our Integrated Impact Assessment, we have set out the regulatory impacts we anticipate from these proposals.

When responding to the following questions, please make it clear which proposal(s) you are referring to.

Are there any further regulatory impacts that may arise from any of our proposals? If so, please explain your answer in the space below.

Welsh language

- It will be important that all centres ensure that the organisation of the curriculum enables pupils to make and sustain good progress in developing their Welsh language skills.

Other considerations

- It is important to acknowledge that the volume of change in education is considerable and this needs to be managed carefully. For example, it is likely to be especially sensitive in smaller secondary schools where one teacher may be responsible for the planning and delivery of one or two subjects across a number of key stages.
- Consideration should also be given to the impact on post-16 providers in planning the transition and progression to A levels, vocational and technical routes.
- Communication with and support from stakeholders, including parents will be an important consideration during the period of change.
- There also needs to be a consideration of how qualifications are positioned in the new evaluation and accountability arrangements

Are there any additional steps we could take to reduce the regulatory impact of any of our proposals? If so, please explain your answer in the space below.

- Further consideration would need to be given to the impact of changes to the Skills Challenge Certificate on post 16.

Do you have any other comments on the regulatory impact of these proposals?

If so, please explain your answer in the space below.

In our Integrated Impact Assessment, we have considered the potential impacts on the Welsh Language and Equalities.

When responding to the following questions, please make it clear which proposal(s) you are referring to.

Would any of our proposals result in any other positive or negative impacts (intended or unintended) on opportunities for people to use the Welsh language?

Positive impact

No impact

Negative impact

Unsure

Please explain your answer in the space below.

We believe that these proposals have the potential to have a positive impact on the Welsh language, in particular in terms of securing an equitable, coherent, and bilingual choice of qualifications for all 16 year olds.

Would any of our proposals result in any other positive or negative impacts (intended or unintended) in relation to treating the Welsh Language no less favourably than the English Language?

Positive impact

No impact

Negative impact

Unsure

Please explain your answer in the space below.

- As above

Would any of our proposals result in any other positive or negative impacts (intended or unintended) for individuals or groups who share protected characteristics outlined within the Equality Act 2010?

Positive impact

No impact

Negative impact

Unsure

Please explain your answer in the space below.

The proposals must ensure that a suitable range of qualifications are available for pupils of all abilities and that there is sufficient choice, including vocational qualifications.

If you have anything else you would like to say about the information outlined in this consultation document, please use the space below.