

**Qualifications Wales
Qualified for the future
7 February 2020**

1. The NASUWT welcomes the opportunity to comment on the 'Qualified for the future' consultation on the principles to help shape the qualification offer.
2. The NASUWT is the largest teachers' union in Wales representing exclusively teachers and school leaders.

GENERAL COMMENTS

3. The NASUWT continues to press for the development of a curriculum and qualifications system in Wales that supports teachers in meeting the needs of learners effectively.
4. The NASUWT believes that all children and young people have an entitlement to access a broad, balanced, relevant and engaging curriculum.
5. In the view of the NASUWT, public education is a cornerstone of democratic society; it is an essential element in the framework of social rights of children, young people and adults. Public education, in our view, must also be defined by its universality. Public education should encourage personal fulfilment, social responsibility, knowledge, cultural acquisition and skills for life. It should deliver for society's needs for social and economic development, political participation, environmental responsibility and international solidarity. Schools should not simply be 'exam factories', as this is detrimental to the mental and physical wellbeing of pupils. The qualifications framework must recognise and address this.
6. The Union campaigns for the introduction of curriculum frameworks and qualification systems that do not result in excessive and unnecessary

workload burdens for teachers and school leaders, or distract them from their core responsibilities for teaching and leading teaching and learning.

7. The NASUWT has submitted a detailed response to the Welsh Government consultation proposals on the implementation of a revised curriculum from September 2020, setting out its concerns and the steps that the Welsh Government will need to take to get the process of curriculum reform back on track.
8. The NASUWT is clear that, in many respects, the current curriculum framework is not fit for purpose and is in need of reform. In general, the report of the review of the curriculum undertaken by Professor Graham Donaldson, *Successful Futures*, set out a coherent and rational basis for the future development of the curriculum framework in Wales. However, in a range of critical respects, the proposals for the curriculum published by the Welsh Government have failed to reflect many of the key principles articulated in *Successful Futures*.
9. In particular, the recommendation that the curriculum should be developed by the workforce, for the workforce, has not been given practical effect. The exclusion of the voice of the profession has resulted in a proposed curriculum model that would, if implemented, generate significant workload burdens for teachers and undermine the ability of schools to secure for all children and young people their entitlement to a broad and balanced range of learning experiences.
10. The failure to develop a coherent implementation plan is a serious omission. As a result, it is not clear how the new curriculum would be resourced and how it would cohere with the qualifications framework. Strategic issues in respect of the workforce implications of curriculum reform have not been subject to meaningful evaluation and planning, particularly in respect of subject specialisms in the secondary sector. This again has implications for the qualification system moving forward.
11. While the NASUWT recognises that a key aim of the reform process was to address the shortcomings of the current levels-based assessment system, the proposals set out in the consultation document on the

curriculum would simply replicate many of these problems and fail to secure consistent and manageable assessment practice across the education system. The assessment proposals would also pose a risk, in practice, to curricular breadth and balance by giving undue prominence to achievement outcomes in the design of schools' curricular programmes.

12. The NASUWT is clear that there is a failure on the part of the Welsh Government to recognise that reducing curricular prescription will not, of itself, secure enhanced scope for teachers to make use of their professional discretion. Schools will retain significant power to impose curricular and assessment approaches on teachers in classrooms.
13. Today, Organisation for Economic Co-operation and Development (OECD) countries are focusing on building a 21st century curriculum, enabling all young people, regardless of background, to compete in the global economy. Whilst the NASUWT would not endorse a simple utilitarian purpose for public education, there remains a need to give all pupils a relevant curriculum experience fit for the knowledge and skills demands of the 21st century. This means extending entitlement not only to high-quality academic study, but also to high-quality vocational education for all young people aged 14-19. This should be underpinned by a strong commitment from businesses and employers' organisations to equality of access to high-quality, practical, hands-on, work-based learning opportunities.
14. The NASUWT insists that the qualification framework and the new curriculum should be developed in parallel. However, the nature of this consultation has the potential to pre-empt the outcome of the consultation on the curriculum and therefore undermine it.
15. Turning to the specifics of the qualification framework, the NASUWT notes that, since 2015, general qualifications in Wales have been subject to significant reform. These reforms have placed significant pressures on the teaching workforce. The Union continues to work to protect teachers and school leaders from excessive and unnecessary qualifications-related workload.

16. The Union is extremely concerned that the turbulence caused by the flawed implementation of the new curriculum will be exacerbated by a badly thought out further reform of GCSEs.
17. This will only increase the stress and workload of an already overburdened workforce. The NASUWT has been warning for some time that there is a recruitment and retention crisis in the teaching profession, and the further reform programme of the Welsh Government, coupled with qualification changes, has the potential to drive more teachers, particularly in the secondary sector, out of the profession. This is also being aggravated by staff restructuring in secondary schools, removing subject-specific Teaching and Learning Responsibilities (TLRs) and replacing them with posts that are focused on the Areas of Learning and Experience.
18. The Union is very concerned that this may lead to a further reduction in properly qualified and experienced teachers in secondary subjects, many of which are already suffering from shortages.
19. The NASUWT will continue to ensure that the impact of the reforms for learners and teachers is reviewed and evaluated effectively and, where necessary, to address the concerns of the workforce in terms of qualifications content, structure and manageability. The Union has stressed the importance of learning from the experience of recent reforms in the development of future qualifications policy.

SPECIFIC COMMENTS

20. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form. The Union does not require any part of this response to remain confidential.

Guiding principles to help shape the qualification offer

Q4. Qualifications Wales should take steps to ensure that publicly funded qualifications taken at 16 relate to, and support, the new curriculum for Wales.

Please explain your answer in the space below.

As noted above, the NASUWT has raised serious concerns about the current proposals for the new curriculum in Wales. Whilst agreeing that the qualifications system must relate to the curriculum, and vice versa, the Union insists that Qualifications Wales (QW) should be cautious in its forward work programme until the curriculum has finally taken shape and been agreed.

The Union is unsure as to precisely how QW will be able to set the parameters of the qualification specifications if the curriculum is, to all intents and purposes, 'content free'. There is a significant possibility that the examination specifications could lead the curriculum at the previous 'key stage 3' level to restricting pupil and teacher choice on the specifics of the curriculum. This should not be the aim or purpose of the qualification framework.

The curriculum should be broad and balanced. The qualification framework must enable this and not restrict it. Whereas the NASUWT understands QW's perspective that the principles proposed could lead to less relevant qualifications being removed, the Union considers that this should only be the case when qualifications are completely *irrelevant*. The qualification framework must reflect the curriculum, not shape it.

Furthermore, the assessment approach is still at an embryonic stage and the NASUWT therefore, cannot see how any firm decisions could be made at this point on the nature of examinations at age 16.

The Union also notes that the qualification framework is to some extent already out of step with the other UK jurisdictions in that the participation age in Wales remains at 16, whereas elsewhere formal education does not end until 18. The NASUWT believes that this must be considered in

future and, whilst not a matter directly for QW, the question must be posed whether the main focus of examination should take place at 16, or whether moving to a qualification framework that matches the end of formal education at 18 is now more appropriate.

The NASUWT notes in this regard that there are no proposed or predicted changes to A-levels. Currently, A-levels are supposed to build on the skills and knowledge that learners gain during their GCSE study. In turn, the content of GCSEs is supposed to reflect the requirements of the National Curriculum. If GCSEs are to change radically, as they would need to do to reflect a radically changed curriculum, and A levels are not to change at all, significant incoherence would be the inevitable result.

This serves to highlight the profoundly disordered nature of current proposals for curriculum and qualifications reform and emphasises the NASUWT's call for the Welsh Government to press the pause button on the curriculum reform and work with the Union to develop a more rational approach.

Q5. Qualifications Wales should require awarding bodies to make all publicly funded qualifications taken at 16 available in both Welsh and English.

Please explain your answer in the space below.

This is an essential element of the qualification system in Wales. However, QW should ensure that applying this principle to qualifications developed outside of Wales does not result in these being withdrawn so as to potentially limit schools' and pupils' choices. QW should work with other providers to continue to make these available and to encourage bilingualism.

However, if there is evidence that the qualification is not and will not be required in Welsh, then QW should be able to make exceptions.

QW must ensure that previous mistakes over the publication of materials and resources in the Welsh language are not replicated, and that all such elements are available at the same time as those in the English language.

To this end, specifications and materials in English and Welsh should be developed in parallel.

Q6. 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.

Please explain your answer in the space below.

Whilst the NASUWT agrees that qualification offers should be equitable and coherent, the Union would not wish this to be achieved by limiting or restricting the number of subjects available.

As noted above, the NASUWT firmly believes that pupils must have access to a broad and balanced curriculum offer. *Successful Futures* states:

‘Young people should all leave school having experienced a broad education that equips them to thrive in an increasingly complex and rapidly changing world.’

And:

‘The structure of the curriculum should...embody the entitlement of all children and young people, including those with severe, profound or multiple learning difficulties, to a high-quality, broad and appropriately balanced education throughout the period of statutory education’

The Welsh Governments *Education in Wales: Our National mission* states that the Curriculum should:

‘extend and promote learners’ wider experiences so that it is rich and varied as well as being inclusive, broad and balanced’

The availability and range of qualifications must not, therefore, in any way place limits on the curriculum offers in schools. While it may not be possible to always achieve an ‘everything for everybody’ approach, neither should there be artificial limits.

The NASUWT recognises that a large proportion of the qualifications available to 16-year-olds in Wales are not or are rarely used. Nevertheless, the awarding bodies clearly feel that these qualifications are valuable and necessary. QW must therefore use caution before removing apparently unused qualifications from the list.

The NASUWT remains of the view that QW must be extremely careful that in basing any new framework on the reformed curriculum, it does so first and foremost in the sound knowledge that the curriculum itself will have wide acceptance and agreement and will actually deliver on its proposed purposes. This is not an insignificant or straightforward matter; it is fundamental in ensuring that the qualification framework is built on firm foundations. Although it can be argued that the *purposes* of the curriculum are clear, the actual content remains vague beyond the ‘what matters’ statements and is likely to remain so, being shaped and firmed up only by the schools and teachers themselves.

This leaves the specifications for examination in a difficult place as the experience of pupils may vary widely from school to school, maybe even from class to class. Will the situation then revert to a curriculum driven by the qualification specification rather than the needs and aspirations of the pupil?

If the drawing up of principles to make the qualification offer coherent and equitable were a straightforward matter, it would raise the question as to why it has not been done before and why there is now a proliferation of redundant qualifications. The NASUWT reiterates that any steps towards this need to be undertaken with significant caution and only when the curriculum and the assessment approach are agreed and accepted.

Q7. 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.

While the NASUWT has concerns regarding QW's ability to apply the currently proposed principles, the issue lies with the underlying curriculum, particularly as it is yet to be finalised. Until such time as the curriculum is in place and shown to be appropriate and successful, it would be foolhardy to propose any firm principles to formulate the qualification framework.

GCSEs fit for the future

Q8. 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.

Please explain your answer in the space below.

The NASUWT maintains that any reforms to the nature of GCSEs must retain the public confidence, currency and universal recognition of the quality of the qualifications. Simply retaining the name 'GCSE' is an insufficient guarantee to the continuation of standard. What lies beneath is critical to the continuity of approval. A radical change to the nature of the qualifications could easily undermine their credibility in the minds of the public, employers, universities, schools and the students themselves. No-one would wish to follow a course of study that will end in a worthless qualification. The name itself will not save the currency of GCSE if the qualification itself is radically changed. Making them so unlike the current specification risks losing their currency, comparability and portability. QW therefore needs to do more than just 'keep this in mind'.

This is not to say that the NASUWT advocates relinquishing the GCSE brand, only that QW must ensure that the qualification remains reliable and comparable.

Any poorly thought-through and implemented reform could result in institutions abandoning GCSEs and adopting better recognised and secure qualifications.

Q9. 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.

As previously stated, the NASUWT does not believe that it is possible or sensible to attempt to define the specific nature of GCSE qualifications until the new curriculum has completed its consultation stage, is fully embedded and is accepted by the profession and the public.

The Union has called for a radical overhaul of the current design, and in these circumstances the NASUWT does not believe that QW should embark upon wholesale changes.

The proposal implies that the curriculum will move away from traditional subject boundaries and that the current model of GCSEs will in some way follow, despite being fully embedded in current practice.

It is unclear as to how schools and, particularly, secondary subject teachers will manage this change. The Union does not believe that the vast majority of the profession have been engaged with the so-called co-construction, which has been limited to a handful of, generally, senior staff.

The NASUWT believes that the new curriculum may be treated with some scepticism by many teachers and it may not be universally accepted. It is

therefore difficult to make any suggestions at this early stage in the process.

A qualification to assess wider skills

Q10. 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.

Please explain your answer in the space below.

The NASUWT again recommends proceeding with some caution until the final curriculum is known and fully understood. It is unclear at this time whether this requires a stand-alone qualification or whether a broader approach should be taken.

The Union notes the proposal to include 'innovation' in the wider skills element of the curriculum. True innovation and originality are extremely rare and there must be a detailed analysis undertaken to understand the real meaning of this and how it can be incorporated into a qualification.

Q11. 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 NASUWT reiterates that until the full details and impact of the curriculum is known, it is not possible to make any clear suggestions or to take any final decisions.

The NASUWT welcomes the recognition by QW that there will be an impact on stakeholders, including (in particular) teachers, in developing proposals. As previously stated, the Union believes that this must be at the forefront of any qualification design and each step must be properly workload assessed.

Impact assessments

Q12a. Are there any further regulatory impacts that may arise from any of our proposals? If so, please explain your answer in the space below.

The NASUWT notes that QW has identified that changing the curriculum and the qualification framework at the same time would result in there being no easily used benchmarks against which progress on the reform journey can easily be made. The Union cautions against using external sources, such as PISA assessments, in lieu of this.

The Union, therefore, considers that QW should proceed with caution before making radical changes to the framework as this may have a serious impact.

Premature action to reform the qualification framework could be a significant risk if the new curriculum is perceived to be deeply flawed and there is a speedy return to the status quo.

The Union also notes that the regulatory impact statement recognises that: '*major changes to existing qualifications would likely require time to gain the understanding and confidence of all stakeholders*'. The NASUWT does not believe that the consultation document itself fully recognises this fact and that the proposal takes this into account.

The NASUWT also does not consider that there are significant risks in a 'do nothing' approach regarding the '*subsidiarity approach adopted in the curriculum development process*' as the Union maintains that this, on the whole, did not occur.

Q12b. 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.

The NASUWT does not have any further suggestions.

Q12c. Do you have any other comments on the regulatory impact of these proposals? If so, please explain your answer in the space below.

The NASUWT does not have any further suggestions.

Integrated Impact Assessments

Q13a. 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?

Please explain your answer in the space below.

The NASUWT considers that there will be a positive impact on the opportunities for people to use the Welsh language if the principles in the consultation document are adopted and implemented.

Ensuring that qualifications and support material are available bilingually can only have a positive effect.

Q13b. 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?

Please explain your answer in the space below.

The potential negative result of the proposals would be that some qualifications may be withdrawn as a result of the implementation of the proposals. This may actually have a negative impact on the English language provision.

Q13c. 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?

Please explain your answer in the space below.

The NASUWT is unaware of any impacts on protected groups from these proposals.

Q14. If you have anything else you would like to say about the information outlined in this consultation document, please use the space below.

The NASUWT has no further comments to make.



Chris Keates (Ms)

General Secretary

For further information on the Union's response, contact Neil Butler, National Official for Wales.

NASUWT Cymru
Greenwood Close
Cardiff Gate Business Park
Cardiff
CF23 8RD
029 2054 6080
www.nasuwt.org.uk
nasuwt@mail.nasuwt.org.uk