

Qualifications Wales

Qualified for the future: The right choice for Wales

9 April 2021

1. The NASUWT welcomes the opportunity to comment on Qualifications Wales consultation - *Qualified for the future: The right choice for Wales*.
2. NASUWT - The Teachers' Union - represents teachers and headteachers in Wales and across the United Kingdom.
3. The NASUWT does not require that any part of this response should remain confidential.

GENERAL COMMENTS

4. The NASUWT notes that this consultation stems from the proposed introduction of the new curriculum for Wales and the future range of subjects that should be available as GCSEs, and which other made-for-Wales qualifications to help schools deliver their curriculum and meet the needs of learners.
5. The Union also notes that following previous consultations, Qualifications Wales decided that the main qualifications taken by 14-16-year-olds should still be called GCSEs, but that the content and assessment of GCSE qualifications should change to meet future needs.

6. 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.
7. The NASUWT believes that all children and young people have an entitlement to access a broad, balanced, relevant and engaging curriculum.
8. 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.
9. The NASUWT is of the view that a fundamental purpose of GCSEs is to evidence learners' achievements against demanding and fulfilling subject content. The Union is also clear that the qualifications framework should operate in way that supports work to maintain the world class status of the education system in Wales.
10. 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.
11. The NASUWT has submitted a detailed response to the Welsh Government consultation proposals on the implementation of a revised curriculum, setting out its concerns in a range of critical respects; the

proposals for the new curriculum have failed to reflect many of the key principles articulated in *Successful Futures*.¹

12. 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.
13. The failure by the Welsh Government to develop a coherent implementation plan for both the new curriculum and associated qualifications 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.
14. 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.
15. 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 undermine the new curriculum.
16. In this context, the NASUWT is concerned specifically that the apparent development of GCSE subject content requirements prior to finalisation of new curriculum programmes of study for 11–14-year-olds will result

¹ *Successful Futures - Independent Review of Curriculum and Assessment Arrangements in Wales*, Donaldson, 2015: <https://gov.wales/sites/default/files/publications/2018-03/successful-futures.pdf>.

in an inappropriately qualifications-led approach to curricular provision in schools. The NASUWT remains clear that a key purpose of the qualifications framework should be to provide a means by which pupils' learning in the context of the curriculum can be assessed and externally accredited. An approach established on this basis also allows for the development of curricular provision within a framework that supports coherent learning progression from the commencement of Foundation Phase through to Year 11 and beyond.

17. The Union also maintains that there is a need to ensure that the general qualifications framework provides an effective basis for further learning through, for example, study towards A-levels or qualifications accessed through participation in apprenticeship programmes.
18. The NASUWT continues to remain concerned that changes to GCSEs are being taken forward through processes separate to those associated with reforms to the curriculum and the school accountability framework, thereby undermining critical policy coherence. Qualifications Wales must ensure that these important and highly integrated elements of the education system are coherent.
19. The proposals in this consultation also pose risks if the ability for schools to recruit teachers with the right skills linked to a reformed qualifications framework cannot be realised. Many subject areas are already experiencing severe shortages, not least in Welsh-language provision. Qualifications Wales must take this into account with the design of the qualifications framework.
20. Turning to the specifics of the qualification framework, the NASUWT has noted in previous consultations 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.

21. 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 Responsibility Allowances and replacing them with posts focused on the Areas of Learning and Experienced.
22. 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.
23. The year-on-year redundancies that many secondary schools have faced over the past years have seen a narrowing of the curriculum, as efficiency savings have seen many non-core subject provisions either reduced or lost entirely in many schools.
24. These schools will face the challenge of being able to provide a broad curriculum and its associated qualifications with a reduced workforce. Unless there is a redress of school funding by the Welsh Government, the GCSE provision of many schools will remain narrower so as to lie within their financial constraints. This does not align with the narrative of these proposals.
25. The NASUWT is also concerned that further changes to the GCSE framework, coupled to the changes carried out in England, will undermine the commonality of qualifications frameworks across the UK, given that the GCSE remains the principal 16-plus qualification in Wales, England and Northern Ireland.
26. The NASUWT considers that the current health crisis owing to the pandemic of COVID-19, and the recovery phase that will be necessary,

is the wrong time to initiate wholesale changes to not only the curriculum and the accountability framework, but also the qualifications framework aligned to it. Space is needed to allow teachers and schools to recover from this time of extreme stress. Progressing at this time could lead to irretrievable mistakes being made.

27. The Union has therefore called on the Welsh Government to delay the implementation of the new curriculum in the face of the disruption to schools and the education system, stemming from the health emergency.
28. Teachers and teaching will remain disrupted for the foreseeable future, and teachers and schools have learnt a whole new way of working online and have poured their efforts into secure blended learning opportunities for pupils. The NASUWT considers that it is entirely unreasonable to place additional burdens on teachers at this time.
29. The Union remains clear that in these circumstances, it would not be appropriate to proceed with implementation of the proposed curriculum by the start of the academic year 2022/23, and it has also insisted that the Welsh Government works with the NASUWT and other relevant stakeholders to address the concerns identified by the Union and to develop a realistic strategy for the implementation of reform. This should also include Qualifications Wales and the reforms to GCSEs.
30. 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.
31. Notwithstanding these concerns, the Union is clear that if the qualifications system is to make an effective contribution to ensuring that all pupils can reach their full potential, qualifications should be

designed in a way that continues to promote a culture of high expectations across the education system and that provides realistic but challenging objectives for learners.

SPECIFIC COMMENTS

32. The NASUWT offers the observations and comments that follow in relation to the questions posed on the consultation response form.
33. The Union has sought the views of NASUWT members and activists who are subject specialists, which provide some insight into the impact of qualification reform on schools, teachers and pupils.

Expressive Arts

Question 1. How far do you agree or disagree with our proposals to review and reform GCSEs in Art and Design, Drama and Music?

Please explain your answer.

The success of the proposals relies on the presumption that they will mirror, or at least they will be significantly based upon, current provisions. This would allow a seamless transition to the proposed qualifications that would be anchored by the specialism and expertise of the incumbent staff teaching these qualifications. The NASUWT would be concerned to see the proposed qualifications as well as the possible assessment mechanisms be so radically different to the current provisions, as it would create significant workload for those staff.

Question 2. How far do you agree or disagree with our proposal to create a new GCSE in Film and Digital Media?

Please explain your answer.

The uptake and success of the proposed qualification is dependent on staffing numbers as well as the available specialism within the school. Whereas proposed qualifications that relate to currently existing qualifications can rely on existing resources, new qualifications would require new resources and, potentially, staff redeployment, recruitment or training. These factors all require adequate funding, and the NASUWT remains concerned that the financial situation of many schools and educational sites is a barrier to the success of these proposals. It may be the case currently that one GCSE is more viable for schools than the other due to the technical aspect and its associated costs. Combining both into one would have to be done with consideration to its viability within the aforementioned financial constraints.

Question 3. How far do you agree or disagree with our proposal to make sure that a choice of qualifications that assess dance continues to be available to learners and schools?

Please explain your answer.

The statement in the consultation that dance is a peripheral subject across the nations due to take-up is not expanded upon with detail as to why this may be the case. Whilst the proposals align with the breadth of choice enshrined in the new curriculum, the new GCSEs must be influenced by pragmatism. The proposal to continue to ensure that the qualification is obtainable for those wishing to undertake it is reasonable, but any further development with this qualification should

be researched upon before taking any further steps since the uptake and success of any proposed qualification is dependent on staffing numbers as well as the available specialism within the educational site.

Question 4. How far do you agree or disagree with our proposal to continue to give schools a choice of qualifications in Expressive Arts that offer a multidisciplinary approach?

Please explain your answer.

The proposal to continue to give schools a choice of qualifications in Expressive Arts that offer a multidisciplinary approach will cater for schools of all shapes and sizes, whilst a distillation to one encompassing qualification may well alienate many schools restricted by available specialism and funds. The NASUWT feels that the financial situation of many schools and educational sites will be best met with the proposal to continue to give schools a choice of qualifications in Expressive Arts that offer a multidisciplinary approach.

Health and Wellbeing

Question 1. How far do you agree or disagree with our proposal not to create a new qualification intended to support the delivery of the whole of this Area?

Please explain your answer.

The current provisions allow schools of all shapes and sizes to choose what qualifications to provide according to their available specialism, funds and learner needs. The NASUWT feels that the financial situation of many schools and educational sites will be best met with the proposal to continue with a suite of qualifications. For example, a

similar process has already happened when GCSE Child Development was combined with GCSE Health and Social Care. This not only prevented learners from acquiring two separate GCSE's leading the way to a caring employment pathway, but the replacement course, WJEC GCSE Health, Social Care and Childcare, became a very legislation-heavy, abstract, evidence-intensive and content-heavy qualification that as a result alienated many of the target audience of 14-16-year-olds.

Question 2. How far do you agree or disagree with our proposals to review and reform GCSEs in Food and Nutrition, Physical Education, and Health and Social Care, and Childcare?

Please explain your answer.

The success of the proposals relies on the fact that they should mirror, or at least they will be significantly based upon, current provisions. This would allow a seamless transition to the proposed qualifications that would be anchored by the specialism and expertise of the incumbent staff teaching these qualifications. The NASUWT would be concerned to see the proposed qualifications be radically different to the current provisions, as it would create significant workload for those staff. Specifically, a review of Health and Social Care, and Childcare would be welcomed by our members, not least for the reasons set out in the Question 1 response above.

Humanities

Question 1. How far do you agree or disagree with our proposals to review and reform GCSEs in Business, Geography, History and Religious Studies?

Please explain your answer.

It is probably a necessity to reform the present Humanities subjects GCSEs – not least so as to be in line with the requirements of the new curriculum, but also so as to address practitioner issues. For example, in terms of the teaching of GCSE Geography, the current content is very broad, and the process of creating a portfolio for non-exam assessment based on limited days of fieldwork is laborious, taking more than the 20% value of the qualification to complete time-wise.

Thought also needs to be given to the workload impact of qualifications reform coming at a time when KS3 new curriculum reforms will still be bedding in. This will be particularly difficult for schools where restructuring has removed departmental leads in these subject areas. The work in these schools will fall back on lone AoLE Heads of Humanities and these staff members will not be subject specialists in all of these areas, so they will inevitably struggle. Short-sighted schools that have conducted this restructuring will have to face these problems.

Question 2. How far do you agree or disagree with our proposal to create a new GCSE in Social Studies, if feasible?

Please explain your answer.

Whilst there are merits of offering a new GCSE in Social Studies, the community challenge qualification within the existing Skills Challenge Certificate currently meets this provision. Having both pathways for Social Studies may cause the GCSE to be offered by fewer schools as a result – especially since Qualification Wales wants to confirm

whether there will be enough demand from schools and learners to make this proposed qualification viable for an awarding body to develop and deliver.

Whilst the new GCSE '*may replace*' Citizenship, Sociology and Law as stated elsewhere of the consultation document, the NASUWT believes that a firmer commitment is required before any extensive work is to be done on these three distinct subjects only to find them removed a few years down the line.

Question 3. How far do you agree or disagree with our proposal to create a new integrated GCSE in Humanities, if feasible?

Please explain your answer.

The NASUWT does not agree with the proposal. Offering a more holistic and integrated GCSE that is based on a selection of the content of the existing humanities subjects would dilute the content, skills and knowledge required by learners to progress their post-16 career.

Further, the resultant loss of History and Geography as distinct subjects would be extremely controversial and it would be a major education and cultural disaster for History and Geography not to be available as examination subjects in Wales.

Languages, Literacy and Communication

Question 1. How far do you agree or disagree with our proposal to create new combined language and literature GCSEs in English and Welsh to replace the existing separate GCSE qualifications?

These new combined GCSEs would each be roughly the size of 1½ GCSEs.

Please explain your answer.

Whilst the proposals help to secure equity of provision for learners within and across schools, and offer greater flexibility for learners to have more choice about which other qualifications they want to study, the combined one and a half Language and Literature GCSE would have to be equally accessible to all learners. There are currently issues about the quantity of reading that additional learning needs (ALN) learners have to attempt (even with ALN support) with the literature GCSE – especially since the removal of tiered examinations. Historically, GCSEs have been presented and taught in quanta of year or two-year long courses. Whilst this obviously fits in with the academic calendar, the proposal of 1½ or ¾ length GCSEs will present schools with challenges in how they timetable such courses.

Question 2. How far do you agree or disagree with our proposal to discontinue GCSE Welsh Second Language and create a new, bigger GCSE designed for learners in English-medium contexts? The new qualification would be roughly the size of 1½ GCSEs.

Please explain your answer.

The proposal clearly aligns with the Government's *Welsh language continuum*, which itself feeds into the Cymraeg 2050 Strategy. What is not clear is the subject content for the proposed GCSE. If the proposed GCSE requires more knowledge or different skills that the current

GCSE requires, then the NASUWT would expect that relevant training would be provided and funded to those teachers that might require it.

The document confirms that: *'Across the system, more suitably qualified teachers are required in schools to deliver more Welsh language teaching.'* Consequently, the Union seeks assurances from the Government that it will militate against the possibility of the proposals impacting adversely on the education workforce where schools attempt to recruit rather than re-skill.

Question 3. How far do you agree or disagree with our proposal to create a set of small Welsh language skills qualifications that can be taken in addition to a GCSE to support progression along the Welsh language continuum?

Please explain your answer.

The uptake and success of the proposed qualification is dependent on staffing numbers as well as the available specialism within the educational site. Whereas proposed qualifications that relate to currently existing qualifications can rely on existing resources, new qualifications would require new resources and potentially staff redeployment or training. The same caveat set out in Question 2 above would apply here as well.

Presumably, these proposals would be optional rather than mandatory. These factors all require adequate funding, and the NASUWT remains concerned that the financial situation of many schools is a barrier to the success of these proposals. There is a real risk with such proposals to unintentionally create a two-tier education system of those that can afford to run these courses and those who cannot.

Question 4. How far do you agree or disagree with our proposal to review and reform made-for-Wales GCSEs in French, German and Spanish?

Please explain your answer.

The uptake and success of the proposed qualification is dependent on staffing numbers as well as the available specialism within the educational site. Whereas proposed qualifications that relate to currently existing qualifications can rely on existing resources, new qualifications would require new resources and potentially staff redeployment, recruitment or training. These factors all require adequate funding, and the NASUWT remains concerned that the financial situation of many schools is a barrier to the success of these proposals.

Question 5. How far do you agree or disagree with our proposal to create a set of small, made-for-Wales qualifications in a range of international languages to support engagement and progression in language learning?

Please explain your answer.

Assuming local needs, the uptake and success of the proposed qualification is dependent on staffing numbers as well as the available specialism within the educational site. Whereas proposed qualifications that relate to currently existing qualifications can rely on existing resources, new qualifications would require new resources and potentially staff redeployment, recruitment or training. These factors all require adequate funding, and the NASUWT remains concerned that the financial situation of many schools is a barrier to the success of these proposals.

Question 6. How far do you agree or disagree with our proposal to make sure learners and schools can continue to access a range of British Sign Language qualifications, including any new GCSE developed for learners in England?

Please explain your answer.

The NASUWT broadly supports the proposal. However, the proposal fails to recognise that British Sign Language (BSL) is being taught in Welsh in the nursery sector.² Whilst there are a good number of years before the fruits of this are seen in the secondary sector, any BSL GCSE developments should be Wales-specific rather than a straight transposition of English BSL GCSEs that does not pre-empt the potential of BSL taught in Welsh.

² <https://www.bangor.ac.uk/news/archive/dwylo-n-dweud-speaking-hands-35688>.

Mathematics and Numeracy

Question 1. How far do you agree or disagree with our proposal to create a new combined GCSE Mathematics and Numeracy qualification to replace the two existing GCSEs in Mathematics and Mathematics-Numeracy?

The new GCSE would be roughly the size of 1½ GCSEs.

Please explain your answer.

The proposal would clearly be a selection from the current two specifications. The choice of what to teach should be taken following consultation with teachers. Historically, GCSEs have been presented and taught in quanta of year or two-year long courses. Whilst this obviously fits in with the academic calendar, the proposal of 1½ length GCSEs will present schools with challenges in how they timetable such courses.

Question 2. How far do you agree or disagree with our proposal to create a new small qualification that can be taken in addition to the GCSE to assess a learner's numerical proficiency, using an on-screen assessment method?

Please explain your answer.

The success of the proposal may rest on what contribution the resulting grades may have on the school's mathematics grades overall. If such a proposal would reinforce the Mathematics and Numeracy GCSE results, then it may see favour as a pathway to support certain learners. If not, then the decision to undertake such a qualification may depend on staff, funding and timetable requirements.

The proposal may work best as a subset of the Skills Challenge Certificate rather than part of the GCSE Mathematics suite.

Question 3. How far do you agree or disagree with our proposal to create a made-for-Wales Level 2 qualification in Additional Mathematics?

Please explain your answer.

Whilst the proposal provides a subject-specialism route to A-Level and beyond, such a provision relies heavily on schools having enough staff and resources to provide such extra GCSEs. In general terms, the large secondary schools tend to have enough staff and teaching time to offer these courses, whilst the smaller ones do not. This unintentionally creates a two-tier education system of those that can afford to run these courses and those who cannot. This goes against the leading principles of the new curriculum and has to be a consideration in the debate.

Science and Technology

Question 1. How far do you agree or disagree with our proposal to review and reform GCSEs in Computer Science, Built Environment, Design and Technology, and Digital Technology?

Please explain your answer.

Since Science and Technology are going to be closely aligned as described by the new curriculum, then one would expect some common themes that apply across all these subjects and that they also share some relevance with the Science proposals. In reviewing and reforming these existing GCSEs, one needs to consider the financial impact on schools of making such changes (including introducing the brand new courses); the existing resources that schools may have at their disposal - including staff to deliver the qualifications to learners. The resulting assessment needs to be carefully workload impact assessed. Any practical work involved should not become a burden to

the point that staff and learners have to spend excessive time outside of the normal school day to ensure coursework tasks are fully completed.

Question 2. How far do you agree or disagree with our proposal to create a new Engineering and Manufacturing GCSE?

Please explain your answer.

Detailed proposals for the content and assessment of this new qualification do not yet exist. It is not clear if this qualification involves the study of heavy engineering like ship building and steel production or light engineering and small businesses manufacturing from small, local industrial units. It does not appear to be the type of qualification that can be entirely school-based or taught entirely through classroom-based lessons. Developers of this qualification would need to carefully consider how they can create a learning experience that is not only engaging and stimulating for young people, but also acknowledges the fact that taking pupils out of schools to visit such places presents additional challenges for teaching staff. As already mentioned elsewhere, the NASUWT remains concerned that the financial situation of many schools is a barrier to the success of such proposals.

Question 3. How far do you agree or disagree with our proposal to create a new GCSE Science qualification to replace the existing set of science GCSEs?

This qualification is likely to be roughly the size of two GCSEs.

Please explain your answer.

The Double Award Science qualification has been regularly changed over the years. When changes were made in 2011, they were

influenced by England's decision to make GCSE Science more rigorous. Further changes imposed in 2016 (due to the fixation of the Government on PISA scores) resulted in the introduction of more new content and longer questions. Much of these changes are now too difficult for many learners who are following the qualification. Consequently, we are currently in a position where many of our less able learners have been effectively disenfranchised by the GCSE Double Award Science course because some topics are too difficult for them to understand, and they are being completely demoralised by the style of questions they have to face.

Also, the subject content in Science has crept upward over the years and to date, it is one of the densest GCSEs by content. This creep has to be checked by any review as well as a review of the content itself.

The proposals also suggest a review of the current practical examination provisions. Currently, the practical examination is externally set and externally marked. This minimises workload as well as reduces the possibility of individual or centre malpractice. Any future assessment system needs to continue to follow to the principle of being externally set and assessed.

Question 4. How far do you agree or disagree with our proposal to create a set of small science qualifications that can be taken in addition to the proposed new GCSE Science qualification? These units are likely to be equivalent in size to either one-third or two-thirds of a GCSE.

Please explain your answer.

Small, optional qualifications must be sympathetic of the level of demand presented by the new, mandatory Double Award qualification, as would the accessibility of the examination itself. Developers would need to consider any financial implications likely to arise for centres delivering these new qualifications, as they could involve the

purchasing of equipment and resources that have not previously been required by centres when delivering the traditional qualifications that have been in place.

This proposal would require adequate funding, and the NASUWT remains concerned that the financial situation of many schools is a barrier to the success of this and similar proposals. Whilst the proposal provides a subject-specialism route to A-Level and beyond, such a provision relies heavily on schools having enough staff and resources to provide such extra GCSEs. In general terms, the large secondary schools tend to have enough staff and teaching time to offer these courses, whilst the smaller ones do not. This unintentionally creates a two-tier education system of those that can afford to run these courses and those who cannot.

Integral Skills

Question 1. How far do you agree or disagree with our proposal to reform the Schools Challenge Cymru (SCC) to make it simpler and more manageable, with a focus on assessing the integral skills of:

- Creativity and Innovation
- Critical Thinking and Problem Solving
- Personal Effectiveness
- Planning and Organising

Please explain your answer.

The NASUWT agrees with the proposal to reform the SCC to make it simpler and more manageable. The SCC is a popular and its design means it can be an inclusive qualification. There currently tends to be a patchwork approach by schools to the SCC in that it can be seen as a bolt-on qualification to more traditional GCSEs, but that may be in part due to its current unwieldiness.

On reform, the qualification must retain its accessibility for all learners. Also, its subject content must not deviate far from the inherent subject

specialisms currently found in secondary schools for it to remain viable for schools of all sizes.

Impact assessment questions

Question 1. In relation to the impacts that we have identified, are there any additional steps that we could take to reduce potential negative effects?

Please explain your answer.

The NASUWT would insist that any further consultations must include the teaching workforce who will be designing, implementing and assessing these qualifications. The NASUWT would also insist that any centre-led assessment (be it course work or non-examination practical work) be workload impact assessed.

Question 2. Are there any other positive or negative impacts for individuals or groups who share protected characteristics that we have not identified?

Please explain your answer.

There are no obvious impacts on individuals or groups who share protected characteristics.

Question 3. Are there any positive or negative impacts on opportunities for people to use the Welsh language that we have not identified?

Please explain your answer.

Historically, there have been issues with parity of resources. There has been a delay in provision of Welsh language text books in many

subjects which have disadvantaged learners who study in their native language. In turn, this has created a workload burden on members who have to improvise to fill in these gaps so that the learners do not suffer because of it.

Question 4. Are there any positive or negative impacts in relation to treating the Welsh language no less favourably than the English language that we have not identified?

Please explain your answer.

It is essential that both languages of Wales are given parity so as not to disadvantage learners in either medium.

Question 5. Are there any other positive or negative impacts that we have not identified?

Please explain your answer.

None that we can identify.



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