

Draft Curriculum for Wales 2022

guidance: feedback



Llywodraeth Cymru
Welsh Government

Introduction

We welcome your feedback on the draft Curriculum for Wales 2022 guidance.

The feedback period is open from 30 April and closes on 19 July 2019. We will review the feedback we have received and respond to the themes of the feedback following this time.

We will use this information to help us further refine draft Curriculum for Wales 2022 guidance ahead of making it available in January 2020.

There are both general and more detailed questions which you can feedback upon.

If you work in or support the delivery of education, you may wish to respond to more detailed questions around the new curriculum and assessment arrangements, and professional learning. These questions start broad and become more specific the further you progress.

We recommend you read the following before you respond:

- [A guide to Curriculum for Wales 2022](#)
- [The area\(s\) of learning and experience you want to feedback upon](#)
- [Assessment proposals to inform the development of statutory guidance](#)

If you complete this survey online you can save your feedback and return to complete it at any time. You will need to provide a name and email address for this purpose only. All published feedback will be kept anonymous. Keeping your personal information safe is important to us. Our website [privacy policy](#) explains how we use your information.

If you need assistance with this survey please e-mail
CurriculumForWales2022@gov.wales

General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer: Welsh Government Cathays Park Cardiff CF10 3NQ e-mail: Data.ProtectionOfficer@gov.wales	The contact details for the Information Commissioner's Office are: Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Tel: 01625 545 745 or 0303 123 1113 Website: https://ico.org.uk/
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Audience

The following questions help us to understand your relationship to the draft Curriculum for Wales 2022 guidance.

Do you work in or support the delivery of education?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If yes, what is your organisation? (if no continue below)

Welsh-medium school (Primary)		Higher education institution	
Welsh-medium school (Secondary)		Diocesan authorities	
Welsh-medium school (Special)		Regional consortia	
English-medium school (Primary)		Local authority	
English-medium school (Secondary)		Private training provider	
English-medium school (Special)		Third sector	
Bilingual school (Primary)		Government	
Bilingual school (Secondary)		Adult community learning	
Welsh-medium middle school		Awarding organisation	
English-medium middle school		Teaching union	x
Pupil referral unit (PRU)		Regulatory body (includes Inspectorate)	
Special school		Governing body	
Funded non-maintained setting		Other (please specify):	
Further education college			

What is your primary role?

Headteacher		Chancellor/Vice-chancellor	
Teacher		Lecturer	
Practitioner		Pioneer	
Newly qualified teacher		Governor	
Teaching assistant		Challenge Advisor	
Senior leader		School improvement officer	
Supply teacher		Inspector	
Principal/Vice-principal		Other (please specify): Senior Policy Officer	x

If you do not work in or support the delivery of education, in what capacity would you like to provide feedback?

Parent or carer		Employer	
Adult 18+ (not a parent or carer)		Apprentice	
Child or young person (under 18)		Other (please specify):	
Student/academic			

Are you providing feedback on behalf of an organisation or group?

Yes	x	No	
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If 'yes' please specify

National Education Union Cymru

About the National Education Union Cymru:

- The National Education Union Cymru stands up for the future of education. It brings together the voices of teachers, lecturers, support staff and leaders working in maintained and independent schools and colleges to form the largest education union in Wales.
- The National Education Union is affiliated to the Trades Union Congress (TUC), European Trade Union Committee for Education (ETUCE) and Education International (EI). It is not affiliated to any political party and seeks to work constructively with all the main political parties.
- Together, we'll shape the future of education.

Our response

NEU Cymru welcomes the opportunity to respond to this consultation. Our members believe education practitioners are best placed to direct learning for the children and young people in their various settings. We welcome the sense of autonomy for education professionals to shape the curriculum and the vision behind the new Curriculum in Principle.

Overall, however, our members are supportive of the plans. But they need the aspirational rhetoric to be matched with funding and resources. They have a series of concerns which need addressing to ensure the new Curriculum is fit for purpose:

- Why does it stop at 16? If we are serious about creating ambitious and capable learners ready to learn throughout their lives, and confident of the changes, why does the curriculum end at 16?
- How do we ensure that the new GCSE franchise does not replicate the test-focused traps of the current system;
- There needs to be a workload and wellbeing impact assessment of the changes for both education professionals and learners alike;
- Education professionals need clarity, especially around the role of Estyn and the Consortia;
- Needs to value experience- not replace experienced teachers, but give the new ethos and culture time to bed in;
- No reorganisation of staffing around the new Curriculum, this is demoralising and unhelpful;
- More information is needed on assessment and accountability arrangements as this is unclear.

Our members seek reassurance that this is not a short-term change. Since devolution, education has been subject to many changes and reforms and our members are concerned this has the possibility of being another Welsh Government initiative. They would ask that there be an independent assessment of the outcomes and wellbeing of young people who have been through the education system since devolution, to learn lessons from previous changes.

Section A – General questions

A1. To what extent do you agree that the [draft Curriculum for Wales 2022 guidance](#) will help children and young people to become:

- ambitious, capable learners
- healthy, confident individuals
- ethical, informed citizens
- enterprising, creative contributors?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
		x		
<p>Comments:</p> <p>Whilst a lot of work has been put into drafting the guidance around the curriculum, this alone will not change the education system. There needs to be funding and training opportunities to match the ambition. Our members believe that like the Welsh Baccalaureate before, the curriculum risks not being successful because of the barriers in place.</p>				

A2. Looking at the *what matters statements*, to what extent do you agree that these sum up the priorities for children and young people’s learning?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
		x		
<p>Comments:</p> <p>See comments above.</p>				

A3. Do you think the [draft Curriculum for Wales 2022 guidance](#) could be improved?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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If yes, how do you think it could be improved?

Education professionals need:

- Clear communication from WG, LAs, Estyn and the Consortia;
- Time to co-construct the curriculum with colleagues;
- Opportunities to meet and share best practice
- Opportunities for high-quality training (please don't put training on if it isn't of high quality);
- Funding to match the level of aspiration;
- Assurances this does not require staff re-organisation (and redundancies).

AoLEs

Primary education practitioners are concerned that they cannot respond to the document, as it is too broad. Whereas secondary colleagues are likely to have in depth subject knowledge on a narrower range of subjects, to respond to, primary practitioners are expected to have a broad range of knowledge. The AoLEs are presented separately, whereas it may help primary colleagues to present them together. In the current format they feel it is too difficult to respond.

Autonomy

We are opposed to a prescriptive curriculum, so broadly welcome the plans. Although we are concerned areas of the curriculum may be squeezed out, in favour of other areas. For example, Physical Education (PE) is not a statutory area of the curriculum, and as it rarely has an associated performance measure can be disadvantaged by timetabling of other subjects. If we are serious about wellbeing, PE needs to be an important subject, to avoid the biases which happen with the current curriculum.

We believe greater emphasis needs to be given to learning from and with each other. Whilst we welcome greater autonomy for education professionals to shape the curriculum to their local context, we recognise this is not something which professionals should be doing alone.

A4. To what extent do the [assessment proposals](#) support settings and schools to identify a learner’s strengths, achievements and areas for improvement so they can support a learner’s progression by identifying next steps?

Extremely supportive	Very supportive	Moderately supportive	Slightly supportive	Not at all supportive
			x	
<p>Comments:</p> <p>Workload Whilst we are supportive of formative, rather than summative, assessment, we believe the assessment criteria are going to create excessive workload, and do not reduce the current demands on producing too much data for different purposes. The level of moderation seems excessive if we are truly trusting education professionals. There needs to be a workload impact assessment, and clear information about what education professionals are to stop doing.</p> <p>GCSEs The GCSE franchise needs to be addressed asap. It is inevitable that the tests at the end of the process will shape the learning which goes on beneath it, unless GCSEs are radically and thoughtfully remodeled. Members are concerned that the curriculum will inevitably be reshaped to meet the GCSE criteria at the end.</p> <p>We would also point to concerns raised by our members that Russell Group universities are currently down grading Welsh GCSEs, when compared to English ones. i.e. an A* equivalent in England is worth more to a student than the Welsh A*. This is disadvantaging Welsh students and must be addressed.</p>				

A5. In relation to reporting to parents and carers, please tell us your views on:

- **the role of the learner in contributing to the reporting process**
- **the role of the parent/carer in the reporting process**
- **the information you would want to include.**

We are concerned this has not been workload impact assessed. It seems sensible to keep the current reporting arrangements around parents evening and reporting home.

Section B – Detailed questions

B1. How helpful would you find the [draft Curriculum for Wales 2022 guidance](#) in developing a curriculum for your learners?

Extremely helpful	Very helpful	Moderately helpful	Slightly helpful	Not helpful at all
		x		
Comments: As commented above, funding and training are critical to making this work.				

B2. How well do you think the [draft Curriculum for Wales 2022 guidance](#) allows for all children and young people to gain a broad range of learning experiences?

You may want to consider learning across the different disciplines and subjects which form part of an area of learning and experience.

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		x		
Comments: As the curriculum is not prescriptive, it will allow learning across different disciplines. However, the funding and resources to support this provide an enormous limitation.				

B3. How well do you think [draft Curriculum for Wales 2022 guidance](#) allows for all children and young people to specialise from age 14 in a particular discipline or subject?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

B4. The [draft Curriculum for Wales 2022 guidance](#) is intended to support practitioners and teachers to design a curriculum specific to children and young people. To what extent will practitioners and teachers have the flexibility and support to do this?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
		x		
<p>Comments:</p> <p>Whilst there is clearly some flexibility built into the system, we believe that accountability and the role of Estyn, the Consortia and Local Authorities will have a key role into whether this happens.</p> <p>As already stated, funding, training and resources are key to making this happen, as is time. Whilst the secondary sector is concerned about teaching different curricula at the same time, primary practitioners are concerned that there is not enough time and the curriculum is not phased in, as it is in secondary settings.</p> <p>Members also question how children moving between schools will fit into the curriculum, since it is tailored so locally. Will there be any touchstones which are common across Wales, other than at the end of primary and secondary phases?</p>				

B5. How well do you think the [draft Curriculum for Wales 2022 guidance](#) supports learners to develop skills in the cross-curricular responsibilities (literacy, numeracy and digital competence) and other cross-cutting themes (e.g. Welsh dimension and international perspective, wider skills, careers and work-related experiences, relationships and sexuality education)?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		x		
<p>Comments:</p> <p>This question seems strange to us – it is not the curriculum which will ultimately support this, but education professionals, with enough funding, training and resources.</p> <p>Careers service</p> <p>The need for a high quality and impartial careers services in schools and colleges is more important than ever yet funding an adequate infrastructure to provide such a service has been continually cut back or removed entirely. Our education system is clearly broken, and the Government needs to do some serious rethinking about the short-sighted and narrow vision of education they are providing for our future generations.</p>				

B6. How could the *cross-curricular frameworks* ([National Literacy and Numeracy Framework](#) and [the Digital Competence Framework](#)) be refined to support the development of literacy, numeracy and digital competence across the new curriculum?

Workload

This need to be reconsidered in light of the philosophy of the new curriculum. These seem too prescriptive and also are workload intense – workload impact assessment is key.

Welsh language

We have particular concerns about Welsh language and the capacity of the workforce to deliver Welsh across the curriculum. The ‘offer’ needs to be consistent across Wales, in terms of opportunities to learn Welsh.

Welsh teachers are also concerned that they are being asked to run ‘bilingualism’ across the school. Being a Welsh teacher is not the same as this, and training opportunities for new roles need to be included.

There needs to be active recruitment of Welsh Language teachers, and greater clarity around consistency in the Welsh Language.

B7. How well do you think the guidance for each [area of learning and experience](#) will support children during the Foundation Phase years?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

B8. How well do you think the [draft Curriculum for Wales 2022 guidance](#) supports and enables learners to progress at an appropriate pace for their development within the area of learning and experience from ages 3 to 16?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
			x	
Comments:				
<p>Again, we believe it is not the curriculum in itself which will help learners progress, but properly trained and resourced education professionals.</p> <p>With particular regard to children and young people with Additional Learning Needs, we are concerned that an ‘inclusive curriculum’ is being articulated as mitigating the impact of ALN, and the need for ALP. Some children with ALN will be able to learn better with an inclusive curriculum. However, individually tailored and fully funded support will also be needed. And it is critical that the ALNET Act helps children and young people, and their schools and colleges, access the support they need.</p>				

B9. How well do you think the [draft Curriculum for Wales 2022 guidance](#) will provide a basis to help young people progress beyond the age of 16?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
				x
<p>Comments:</p> <p>We believe that this should have been planned for as a 3-19 curriculum, and only then would it fully equip children and young people for their learning journey. If children are seriously going to be ‘ambitious and capable learners, ready to learn throughout their lives’ there needs to be a range of options for post-16.</p>				

B10. Formative assessment should be given primacy in the new curriculum. How well do the [assessment proposals](#) promote this principle?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
		x		
<p>Comments:</p> <p>This is welcome. But needs to be workload impact assessed, be less prescriptive, and as mentioned above, be more trusting of education professionals.</p>				

B11. [The assessment proposals](#) propose a broader approach to moderation – *supporting professional dialogue regarding the nature of progression, the selection of appropriate learning and assessment activities, as well as ensuring a shared understanding of what achievement looks like in the context of the achievement outcomes.*

How would you envisage your setting /school putting this approach into practice? What further support do you think would be needed?

<p>Whilst a focus on formative assessment is welcome, we are very concerned that as described there is insufficient detail to undertake any meaningful work on the assessment proposals. This goes alongside changes to Estyn inspection, and self-evaluation. It is extremely difficult to view these in isolation.</p> <p>As drafted it seems to imply light touch assessment, which we would welcome. However, more needs to be seen from Qualifications Wales in terms of review, and as we have said, a better understanding of Estyn’s proposals is needed, to ensure that the system is fit for purpose.</p> <p>Assessment for learning is absolutely critical to this, but without trust in, and support for, education professionals, the proposals will not fit the plans for the new Curriculum.</p>

B12. What practical issues for settings and schools do we need to be mindful of if the [assessment proposals](#) are to be made a reality?

There are many implications for the proposals. Without more detail it is difficult to really comment.

Adaptive online assessments do have some benefits, though they need to ensure they learn lessons from this years' cohort taking the assessments. We would welcome a review of the assessments this year.

It is also critical that assessment means assessment for learning, and that any changes are workload impact assessed.

B13. What implications do you see from the [draft Curriculum for Wales 2022 guidance](#) for you and your colleagues' [professional development](#) needs in respect of the:

- **impact on pedagogical practice**
- **implications of planning for a purpose-driven curriculum**
- **professional learning requirements linked to pedagogy**
- **developing in-school and cross-school collaboration**
- **specific areas of professional learning aligned to the areas of learning and experience**
- **opportunities for professional enquiry approaches support delivery of the new curriculum?**

As we have already stated, there will be development needs in relation to the new Curriculum. Our members point to these development needs as important, but need not only the training, but the time to develop practice and plan the curriculum.

We would also caution against reorganisation of schools which risk losing critical expertise. Every member of staff have something to contribute, and it is critical training opportunities include support staff too.

B14. What are the professional learning challenges and opportunities to enact the principles in the [assessment proposals](#)?

The professional learning offer must imbed the principles of assessment for learning and a formative assessment process.

Section C – Specific: Areas of learning and experience

C1. If you would like to provide specific feedback relating to one or more specific areas of learning and experience, please make a selection and add your comments below.

Expressive Arts		Language, Literacy and Communication	
Health and Well-being	✓	Mathematics and Numeracy	
Humanities		Science and Technology	

Comments (if you choose more than one area of learning and experience please label each comment):

We have chosen to provide feedback on the Health and Wellbeing AoLE as it relates to evidence we have provided to Welsh Government earlier this year. In principle, however, our comments relate to all areas covered. The guidance needs to be up to date and ensure best practice is shared amongst our schools, to ensure children and young people receive learning which is fit for purpose.

Since the introduction of the Eatwell guide ¹ and according to the Child Measurement Programme 2017/18 ², obesity rates in 4-5-year-old children in Wales have gradually increased from 11.3% in 2012/13 to 12.4% in 2016/17, with a slight reduction of 0.4% in 2017/18. Wales also has the highest rate of obese and overweight children in the UK with 26.4% being in this category.

Public Health Wales' report "The case for action on obesity in Wales" ³ states that 18% of children aged 11-16 years were classified as overweight or obese in 2013/14. The most recent report figures haven't yet been published.

The Student Health and Wellbeing In Wales: Report of the 2017/18 Health Behaviour in School-aged Children Survey and School Health Research Network Student Health and Wellbeing Survey ⁴ mentions that "*obesity in adolescents can significantly affect psychological health and wellbeing, leading to body dissatisfaction and low self-esteem, as well as bullying and peer rejection*".

The above needs to be considered and addressed under three of the What Matters statements, namely 'Developing physical health and well-being has lifelong benefits', 'How we process and respond to our experiences affects our mental health and emotional well-being', and 'Our decision-making impacts on the quality of our lives and the lives of others'.

Welsh Government need to guide schools to ensure that when they plan and develop the new Health & Well-being Area of Learning and Experience, that they are aware of the content of these reports.

In our response to the Welsh Government's recent Healthy Weight Healthy Wales consultation ⁵ (Question 6), we stated "Embedding daily physical activity is welcomed and to ensure this happens Welsh Government need to guide schools to ensure that when they plan and develop the new Health & Well-being Area of Learning and Experience, that they consider enough time is allocated in the curriculum for physical activity. In recent years, the number of Physical Education (PE) lessons for pupils has decreased significantly, with many Key Stage 2, 3 and

4 pupils only getting one PE lesson per week (for between 45 minutes and an hour), when, under current national curriculum guidelines, pupils should ‘engage in frequent and regular physical activity beneficial to their health, fitness and well-being’. One PE lesson per week is not frequent and regular enough to benefit pupils.”

As mentioned above, Welsh Government needs to guide schools to ensure that when they plan and develop the new Health & Well-being Area of Learning and Experience, that they consider enough timetabled physical activity time within the curriculum during the Foundation Phase and Key Stage 2 (based on the Child Measurement Programme 2017/18 above), but also in Key Stage 3 and 4 (based on The Student Health and Wellbeing In Wales Report above) so that teachers can fully engage pupils in the benefits of being active which will then encourage them to stay active. However, the Daily Mile and other similar activities should not be used to replace Physical Education lessons on the timetable. This is essential if Welsh Government wants schools to fully address the first What Matters statement, “Developing physical health and well-being has lifelong benefits.”

The Health and Well-being Area of Learning and Experience in the new curriculum will play an important part in creating a whole school healthy weight environment. Schools must be guided by Welsh Government to re-enforce a diet of real, natural food together with a healthy amount of regular physical activity.

1 <http://www.fao.org/3/a-as838e.pdf>

2 <http://www.wales.nhs.uk/sitesplus/documents/888/CMP%20report%20%28Eng%29.pdf>

3 <http://www.wales.nhs.uk/sitesplus/documents/888/150119%20The%20case%20for%20action%20on%20obesity%20in%20Wales%20ae%20FINAL1.pdf>

4 http://www.shrn.org.uk/wp-content/uploads/2019/05/SHRN-HBSC-NR_31.05.2019.pdf

5 <https://gov.wales/healthy-weight-healthy-wales>

C2. How well do the progression steps within the Mathematics and Numeracy Area of Learning and Experience articulate the proficiencies illustrated in the principles of progression?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

C3. How well do the learning sections within the Languages, Literacy and Communication Area of Learning and Experience provide for learners to develop translinguaging skills?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

C4. How well does the guidance within the Languages Literacy and Communication Area of Learning and Experience provide for the development of language acquisition and learning?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

C5. How well does the Health and Well-being Area of Learning and Experience guidance support a whole-school approach to supporting health and well-being?

Extremely well	Very well	Moderately well	Slightly well	Not well at all
Comments:				

Is there anything else you would like to add or feedback on?

Please see comments in the introduction.
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Return by 19 July 2019

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