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Welsh Government Consultation – summary of response

Our National Mission: A Transformational Curriculum

Proposals for a new legislative framework

July 2019

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Table of acronyms

Acronym	Expanded version
ALN	Additional Learning Needs
AoLE	Area of Learning and Experience
CfW	Curriculum for Wales
ECHR	The European Convention on Human Rights
FE	Further Education
ITE	Initial Teacher Education
LGBT	Lesbian, Gay, Bisexual and Transgender
MFL	Modern Foreign Languages
PSE	Personal and Social Education
PSHE	Personal, Social, Health and Economic
RE	Religious Education
RIA	Regulatory Impact Assessment
RSE	Relationships and Sexuality Education
STEM	Science, Technology, Engineering and Mathematics
UNCRC	The United Nations Convention on the Rights of the Child
UNESCO	The United Nations Educational, Scientific and Cultural Organization
WRE	Work-Related Education

Introduction

Arad Research was commissioned by the Welsh Government to analyse the responses received during the consultation on *Our National Mission: A Transformational Curriculum, Proposals for a new legislative framework*. This paper presents the key findings of the analysis, identifying the key messages and themes presented in consultation responses.

About the consultation

The Welsh Government's action plan, *Education in Wales: Our National Mission* aims to raise standards, reduce the attainment gap, and deliver an education system that is a source of national pride and public confidence.¹ The development of new curriculum and assessment arrangements (developed since 2016 in collaboration with a network of Pioneer Schools and other education stakeholders) is a fundamental element of achieving this mission. To support the new arrangements, the Welsh Government is also leading on the establishment of a coherent and consistent approach to assessment, focused on the individual learner and enabling everyone to maximise their potential.

Alongside this work, there is a need to update the legislative framework to implement the new curriculum and assessment arrangements. The White Paper consultation seeks views on the proposals for legislation on the structure of the new curriculum framework, with the four purposes at its core, the six Areas of Learning and Experience (AoLEs), the Welsh Language, the English Language, Relationships and Sexuality Education and Religious Education. It also explains Welsh Government's wider intentions for learner assessment and evaluation of schools.

The consultation, *Our National Mission: A Transformational Curriculum*, was launched on 28 January 2019 and closed on 25 March 2019. The full text of the consultation is available at:

<https://gov.wales/our-national-mission-transformational-curriculum>

Welsh Government received a total of 1780 responses to this consultation:

- 1606 were submitted through the online consultation
- 133 were submitted via e-mail
- 21 were submitted via post
- 20 were submitted in the easy read and youth format.

In addition, responses were received from two campaigns:

- 146 responses were received through a campaign organised by Cymdeithas yr Iaith; and
- 189 responses were received through a campaign organised by the Humanists.

Included in the 133 e-mail responses was a report from Young Wales, which consulted with over 180 young people to inform a representative report.

A total of 131 responses were identified as being from organisations and representative bodies and 43 from schools, governors or teachers (it is possible that other organisations, representative bodies or schools also responded but chose to remain anonymous).

¹ Welsh Government (2017), *Education in Wales: Our National Mission*.

It is important to note that not all respondents provided answers to every question. The number of both yes / no / don't know responses and written comments varied significantly between questions. The number of responses to each question is presented in relevant sections of this report.

Methodology

The quantitative data (i.e. data based on closed questions) from the responses which followed the structure of the consultation questions was analysed. These quantitative responses comprised of 'yes', 'no' or 'don't know' answers to some of the consultation questions.

A thematic analysis of the qualitative data (data based on open-ended questions) in the consultation responses was undertaken. The thematic analysis categorised the opinions, comments, statements and issues raised by respondents into overarching themes. The analysis aimed to identify the themes into which the consultation responses most frequently fall. The process for undertaking this analysis was as follows:

1. A random sample of responses for each question was reviewed by two researchers (each reviewing a different half of the sample). The size of the sample was determined by the number of responses received to each question and comprised at least 20% of the total responses per question.
2. The responses in the sample were coded thematically, to identify the themes arising most frequently.
3. One of the researchers then reviewed all the remaining responses to each question to ensure that the identified themes remained constant and to identify new themes arising. This included comparing the comments of those who had answered 'yes', 'no' or 'don't know' to relevant questions.
4. This process ensured that all consultation responses were reviewed during the analysis.

Some questions were posed as open questions, with no requirement for respondents to note whether they agreed or disagreed with the proposals. Other questions included closed 'Yes/No' questions or asked respondents to specify in their comments whether or not they agreed with the proposals. Where closed 'Yes/No' questions were asked, the results have been included under each relevant question. In addition, for some questions it is possible to organise responses into broad categories: agree, disagree, neutral or more nuanced responses.

Reporting findings

This report therefore presents key themes arising frequently within consultation responses. There is a wealth of evidence provided through the consultation which supports these themes and provides significant additional detail for use by Welsh Government.

Throughout the report the themes and points presented are drawn from comments made by consultation respondents and do not represent the views of the report authors. In order to clarify this, under each question the main body of text is introduced by the following statement (or variations thereof):

Among respondents who answered 'yes' / 'no' / don't know the themes raised most frequently were as follows:

Themes are presented in order of frequency under each statement.

For the purpose of brevity and to avoid excessive repetition in how findings are presented, the authors have not prefaced each theme or point with '*Respondents noted that...*'. Instead there is an assumption that the reader will understand that all themes presented are summaries or rephrasings of comments by individuals and organisations who contributed to the consultation.

Finally, interspersed throughout the report is a selection of quotes to illustrate the points and themes raised.

Summary of overarching themes and respondent trends

This initial section presents certain key themes which arose frequently across the consultation in its entirety. Although the consultation questions focus on different policy areas, the analysis has found overarching and recurring themes which are raised across multiple questions and/or are repeated on multiple occasions by respondents.

This section also draws attention to trends that appear in responses from different groups of respondents. These trends are only indicative and do not represent the views of every single individual within these groups.

It is to be noted that this consultation was published before respondents had the opportunity to view the new Curriculum for Wales 2022.

Overarching themes

There was **broadly consistent support for the principle of developing a more learner-centred approach to teaching and learning**, allowing teachers to respond flexibly to individual learner needs. There was also **fairly regular support for the principle of developing a more learner-centred approach to assessment** and progression. These key principles were seen to be in line with the vision and ethos of the new curriculum.

There was a clear emphasis on the importance of achieving **a balance between a learner-centred, flexible and practitioner-led approach**, and an **overarching structure or prescriptive foundation** upon which local curricula can be developed. While consultation responses often acknowledged the benefits of increased freedom in curriculum design and delivery, they emphasised that structures must be put in place to ensure appropriate moderation, monitoring and accountability arrangements. Consultation respondents also emphasised the importance of quality and consistency of provision.

There was seen to be **a need for much more detail and clarity on proposed curriculum content and structure**. This also applies to assessment proposals (particularly the way in which Achievement Outcomes and Progression Steps are defined). Respondents suggested that examples, good practice and guidance will need to be shared to ensure all key stakeholders have a clear understanding of the new curriculum and assessment approach.

Concerns were raised regularly about the **negative impact of the curriculum and assessment reform process on the workloads of education professionals**. The additional learning, planning, design and delivery associated with the new curriculum and assessment approach will place a significant burden on education practitioners, it was suggested. This was seen to exacerbate pressures on a teaching workforce that is already stretched.

Recurring comments were also made in relation to resources, with concerns expressed about the **lack of sufficient resources to implement new curriculum and assessment arrangements**. This includes a lack of sufficient funding for schools, a lack of suitably qualified teachers (including those able to teach Welsh / teach through the medium of Welsh) and a lack of time for professional learning and curriculum development.

Professional development for education professionals was seen as a necessary and core element of curriculum and assessment reform. Good quality, structured

professional development was seen to play a key role in ensuring education professionals understand and are equipped to deliver the requirements of the new curriculum and assessment arrangements.

Effective consultation and engagement with key stakeholders (including parents, schools and representative bodies) was seen as an integral element of future curriculum and assessment reform. Respondents often commented that such stakeholders can offer valuable insight and expertise to the reform process and that their views should be respected.

Certain respondents, in particular those who self-identified as parents, used the consultation as an opportunity to voice disagreement with RSE proposals. This disagreement was a common thread throughout their responses to multiple consultation questions, emphasising in particular the importance of maintaining parental rights to educate their children and respecting religious beliefs. This theme was evidently one which many parents felt strongly about.

The need to avoid an overcrowded curriculum was raised regularly. It was seen as important to ensure curriculum space is not allocated to particular subject areas at the expense of others (for example, increasing Welsh language provision at the expense of other subject areas). It was also seen as important to avoid overcrowding the curriculum by introducing certain subjects deemed as unnecessary in primary schools (including careers education and RSE).

On occasion, respondents faced difficulties in responding appropriately to consultation questions. At times, respondents reported or demonstrated difficulties in understanding consultation questions and/or a lack of awareness or understanding of the information contained within the consultation document. Unfamiliarity with particular policy areas was raised as a challenge, as well as difficulty in understanding some terminology. Difficulty in responding appropriately to certain question structures was also raised (in particular, the inability to provide separate responses on the right to withdraw from RSE, and from RE). These challenges created certain limitations regarding the quality of the consultation data as a whole.

Respondent trends

Below we summarise issues raised by various respondent groups. It is worth noting that some respondents may have chosen not to name any organisation which they may also represent.

Key education stakeholders

Key education stakeholders were those organisations and bodies with overarching strategic responsibility for, or interest in, education in Wales. Responses from these types of stakeholders had a tendency to be supportive of the proposals set out in the White Paper as a whole. However, they tended to focus their comments on the need for strong leadership and accountability structures to support new curriculum and assessment arrangements, as well as more detail on the exact content and structure of these new arrangements. These stakeholders also drew attention to implementation opportunities and challenges associated with the new arrangements, in particular the demands to be placed on the education workforce.

Third sector organisations and representative / special interest bodies

These respondents are those responding on behalf of a wide range of individual organisations, foundations, community groups and religious groups, who often represented a particular area of expertise. As such, there was a tendency for these organisations' views on the White Paper to vary depending on the extent to which they felt their particular area of interest or expertise had been sufficiently considered within the White Paper. Examples of such areas of interest or expertise include Welsh language, the non-maintained sector or mental health. These organisations also tended to make the case for their engagement in future curriculum development, as their expertise and knowledge will prove valuable.

Individuals

Individuals were those responding to the consultation independently or who did not clearly specify they were representing the views of a particular group, organisation or body. These respondents had a tendency to request more information and clarity about the new curriculum and assessment arrangements and on occasion expressed confusion regarding the new arrangements. Individuals on occasion raised concerns over the proposals in relation to RSE, RE and the Welsh language. Individual respondents also tended to emphasise the importance of parental engagement. However, individuals also understood the rationale for curriculum and assessment reforms and were often supportive of the key principles upon which the new approach is based. Individuals also tended to draw attention to the extent to which curriculum content is informed by, and prepares pupils for, wider society.

Teachers and other education practitioners

These respondents specified that they were (or had been) part of the education workforce (such as teacher or headteachers). There was a tendency for this type of respondent to be broadly positive about the principles informing the new curriculum and assessment arrangements, but also expressing a desire for more detail, clarity and support about how they will be required to implement changes. On occasion, these respondents raised concerns about workforce capacity and concerns over how they should be making judgements within the new curriculum structure (such as making a judgement on what is deemed developmentally appropriate and what are suitable Achievement Outcomes).

Young people

Young people are those identified as young people within their consultation response. In general terms, these respondents are positive about the changes happening with regard to curriculum and assessment arrangements, particularly with regard to making education more learner-centred and providing flexibility for teachers. Their queries and concerns tend to focus on how the new arrangements would look when implemented in practice.

Early years, non-maintained and further education sectors

One key emphasis of responses from these sectors was the need to ensure sufficient consideration of the impact of the new curriculum and assessment arrangements on these sectors and their practitioners.

Curriculum: structural proposals

Question 1

Do you agree with our approach to legislating for the new curriculum structure?

Response	Percentage (number)	Number who provided additional comments
Yes	20.8% (232)	78
No	64.3% (718)	333
Don't know	14.9% (166)	34
<i>No response to closed question</i>		21
<i>Total</i>	1116	466

It is worth noting that among those who responded 'no' to the closed question, it was often the case that the respondent expressed disagreement with a specific element of the approach to legislating, rather than opposition to the approach as a whole. Examples of such specific elements include RSE proposals, the approach to legislating with regard to MFL and Welsh language proposals. These specific elements are discussed further below.

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

The approach will support a more flexible model of curriculum design and delivery. Key education stakeholders tended to raise this theme. The approach was seen as being less prescriptive than previous curriculum arrangements, allowing schools and practitioners more freedom to design and deliver a curriculum appropriate to learners' circumstances. Respondents indicated that the professionalism and knowledge of practitioners will be emphasised, as they are provided with increased autonomy and independence to plan curriculum delivery creatively.

"Consistency, freedom to teach, teachers not constrained by content. Ability to plan and teach contextually and motivate pupils." [Education stakeholder]

An appropriate balance between statutory guidance or legislation, and curriculum freedom will be important. Key education stakeholders tended to raise this theme. While an approach which allows practitioners more autonomy and flexibility is seen as a positive improvement, responses also noted the importance of maintaining clear leadership and a clear structural framework to guide practitioners. Similarly, consideration should be given to the appropriate balance between statutory guidance or legislation, and more flexible guidelines to support practitioners.

The proposals will ensure a learner-centred approach to education. Responses agreed that the proposed approach will support schools and practitioners to build a curriculum and pedagogical approach that are tailored to learners' needs. Instead of adopting a target-driven approach to education, practitioners will be able to alter their teaching and Progression Steps to ensure learners are supported and enthusiastic about their learning.

“I feel the 4 aims and areas will develop the whole child and are very child centred. I think it will develop more independent learning and individuals for the ever changing working world.” [Individual respondent]

Particular attention will need to be given to certain elements of implementation.

Resources (both financial as well as staff capacity and wellbeing) will need to be carefully managed to avoid placing additional burdens on schools and teachers during implementation. The professional development of teachers will need to be encouraged, to ensure they are able to adapt to the new curriculum requirements and familiarise themselves with a less prescriptive model of delivery.

Additional themes raised by respondents self-identifying as organisations.

Respondents expressed support for the new curriculum structure and content.

Responses expressed approval of the proposed curriculum structure (in particular the AoLE structure, the four purposes and the cross-cutting themes), noting that it is an improvement on the current curriculum structure. Respondents referred to weaknesses in the current curriculum structure and felt that curriculum reform is timely. The proposed curriculum structure and content was noted as being relevant, modern, current and able to support learners to become rounded citizens.

“Successful Futures...offers a once-in-a-generation opportunity to modernise not just the content of what our children and young people learn but also the way in which they learn, whilst offering a broader platform/framework to develop a wider range of skills required for modern life.” [Education practitioner]

Other respondents expressed support for the approach to legislating for the new curriculum structure. Organisational responses tended to agree with the need to legislate to support the implementation of the new curriculum. Legislation was seen as a necessary foundation for curriculum reform and responses were generally supportive of the proposed approach to legislating.

“The new curriculum needs to be enshrined in legislation for: the avoidance of doubt about what should be taught in Welsh schools; how that teaching should be organised; and for clarification of the responsibilities of the various parts of the education system. Legislation is needed to repeal, alter, or augment current legislation referring to the previous curriculum.” [Education practitioner]

In addition, some organisations deemed it appropriate to legislate for the various curriculum areas, including RSE and RE. Responses noted that legislating for all aspects of the curriculum, including changes to how RSE and RE is delivered, is necessary to ensure learners can access a rounded education.

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

Particular elements of the new curriculum should not be mandatory. Religious Education and Relationships and Sexuality Education, it was argued, should not be mandatory in the way set out in the legislation. Parents should maintain the right and responsibility to decide on their child’s access to RE and RSE. It is not developmentally appropriate for primary-school aged children to be introduced to the subject of relationships and sexuality. The RSE proposals were perceived to show a lack of respect towards

religious beliefs, including beliefs relating to LGBT education. This theme is discussed further in the analysis of questions 6-10 on pages 27 – 38.

Modern Foreign Languages require more prominence in the legislation. Respondents expressed concern that modern foreign languages (MFL) are side-lined in the new curriculum and legislative proposals, to the detriment of learners' language skills. MFL should be given prominence within the new legislation, particularly considering the increased emphasis on Welsh language education.

“If International Languages are not to be provided for in primary legislation specifically, there is a real risk that uptake of languages other than Welsh and English, already fragile, will decrease further or will disappear completely. This is likely to happen most frequently in areas with high levels of social deprivation, thereby increasing inequity across Wales.”
[Third sector organisation]

Expressions of general opposition to curriculum reform and associated legislation. These respondents noted their general opposition to curriculum reform. In particular, they noted that the reform is unnecessary and adds to the already excessive changes which have occurred within the education system in the recent past. The reforms will be detrimental to pupil progress and could be burdensome to schools, as well as limiting their freedom to develop their own curriculum.

More detail on the proposed curriculum reform and associated legislation is needed. Key education stakeholders tended to raise this theme. While broadly in agreement with the proposed approach, key education stakeholders reported that clarity would be needed about the detailed requirements of new curriculum and assessment elements. Individual respondents noted that it is challenging to express an opinion without seeing further detail on the curriculum structure and content, which is yet to be published.

Concerns that the approach to legislating for the new curriculum could lead to a lack of consistency and equity. There were concerns that the legislation will not necessarily ensure consistent quality of teaching across schools, as the flexibility embedded in the approach will lead to discrepancies in teaching approaches across Wales. This could lead to learners in certain areas or certain schools receiving a better or lower quality education and assessment changes will lead to a lack of parity with qualifications in other countries.

“My greatest concern here is around the level of autonomy that schools have to interpret the CfW. The lack of prescribed content means that the curriculum can mean anything to anyone. This will lead to a postcode lottery as some schools will invariably get this right and some will get it wrong...It is imperative that more prescription is given at the national level in terms of the content that should be every child's right to study. This could still leave room for clusters and individual schools to set out their own 'local' curriculum”. [Education provider]

There is scope to include further focus in the curriculum and associated legislation on particular key skills. Responses included views that the current proposals do not necessarily cover important key skills which are necessary for a rounded education. There is scope for an increased focus on life skills (such as financial literacy) and core skills (literacy and numeracy).

The language-medium of education should not be imposed on learners or parents. Parents should maintain the right to choose the language in which their child is educated, and the Welsh language should not be imposed on families through the new curriculum and

legislation. There were concerns that imposing a Welsh language continuum on all schools will disadvantage the learning of children from non-Welsh speaking backgrounds.

Additional themes raised by respondents self-identifying as organisations.

Concerns over the proposed structure of the curriculum, in particular AoLEs.

Concerns were raised regarding the potential dilution of subject-specific knowledge while teaching across an AoLE, including the requirement for teachers to teach outside their areas of expertise.

“We are very concerned by the suggestion in paragraph 3.31 that learning across the full range of scientific disciplines will not be compulsory for learners aged 14–16. The wording implies that a learner who chooses to specialise in other curriculum areas may only receive ‘experiences’ of Science and Technology, which does not guarantee learning to any significant depth or breadth.” [Education practitioner]

Early Years provision and the non-maintained sector has not been sufficiently considered within the proposals. The impact of the proposed curriculum reform and associated legislation on this sector has not been comprehensively considered. This is a missed opportunity, respondents suggested, as this reform process provides an opportunity to develop a continuum of child development from birth until adulthood.

The United Nations Convention on the Rights of the Child should be a prominent aspect of the proposals. Organisations commented on the importance of building an educational approach around children’s rights, the international consensus around education in relation to children’s rights, and building human rights into the curriculum.

Question 2

Do you agree we should impose a duty on schools and Funded Nursery Settings to provide a curriculum to help most learners to reach, or go beyond the Achievement Outcomes set by the school and to progress children along the continuum for the Progression Steps in accordance with their educational development?²

Response	Percentage (number)	Number who provided additional comments
Yes	46.4% (466)	139
No	35.0% (352)	112
Don't know	18.6% (187)	32
<i>No response to closed question</i>		20

² Welsh Government proposes that the new curriculum be organised as a continuum of learning from ages 3 to 16. Progression will be signalled through **Progression Steps** at five points in the continuum, relating. They will act as a road map for each learner’s development allowing for individual abilities, experiences and rates of learning. There will be a duty on headteachers to set **Achievement Outcomes** against each Progression Step for their pupils, which would take the form of statements which describe the type and range of achievements characteristic of children at each Progression Step. Headteachers would have the discretion to specify what the Achievement Outcomes are but would need to have due regard to the Achievement Outcomes set out by Welsh Ministers within statutory guidance.

Total	1005	303
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Among respondents who answered ‘yes’, or expressed neutral or positive views, the themes raised most frequently were as follows:

Respondents agreed with the principle of taking an ambitious approach to learner progress and challenging learners appropriately. Key education stakeholders tended to raise this theme. It is important for the education system to support learners to reach their full potential (including more able learners who may be able to progress beyond set Achievement Outcomes). The new duty was seen as positive in terms of its forward-looking and optimistic approach to learner progression.

“It is always sensible to support learners to achieve their optimal levels of achievement, and whenever children show themselves to be capable of reaching and exceeding expectations and core achievement outcomes, they should be encouraged and supported to do so.”
[Third sector organisation]

Progression Steps will support a learner-centred and developmentally-appropriate approach to progression. Key education stakeholders tended to raise this theme. Respondents noted that Progression Steps are likely to allow schools to adapt progress measurements to suit individual learning needs. This provides an opportunity for education to be relevant, inclusive and responsive to each learner’s potential. Progression Steps will allow learners to progress at a pace appropriate to their own development, rather than at the pace of inflexible assessment stages.

Progression Steps will measure progress consistently and appropriately. While Progression Steps support a more flexible, learner-centred approach to progression, they also provide a national structure which will support consistency across schools and a continuum of progression through key stages.

“This approach allows each learner to progress in accordance with their needs on an individual basis whilst still maintaining a national framework for achievement and progression.” [Religious organisation]

Progression Steps and Achievement Outcomes must be completely clearly and comprehensively set out. There are challenges in placing a duty on schools and Funded Nursery Settings to establish a new and unfamiliar progression structure. As such, very clear guidance on setting Progression Steps and Achievement Outcomes will be necessary, as well as methods of ensuring clear baselines and comparisons.

The curriculum developed should be holistic and comprehensive, to equip learners with suitable progression opportunities and life skills. The duty provides an opportunity for schools and Funded Nursery Settings to establish a broad curriculum which will be relevant to learners and will support their progression in life. Leaving the development of such a curriculum wholly to schools and Funded Nursery Settings poses a risk of inconsistency and so the holistic and comprehensive nature should be guided clearly by Welsh Government.

“It will be important for all schools to offer pupils in their care a rich, broad and innovative curriculum that is fit for purpose in order to equip them with the skills needed for the future.”
[Education stakeholder]

More detail on the proposed curriculum reform and Progression Steps and Achievement Outcomes is needed. In some cases, respondents were unable to state whether or not they agree with imposing this duty, as they do not feel they have sufficient information on the proposed approach. Responses also include views that note that it is challenging to express an opinion without seeing further detail on how the new progression approach will work.

Additional themes raised by respondents self-identifying as organisations.

The themes raised by respondents self-identifying as organisations did not include any additional points to those presented above.

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

Rather than necessarily imposing a duty on all schools, there is scope to trust in teacher’s professional judgement and use encouragement and guidance. Educational professionals should be trusted to undertake their work without the imposition of a specific duty as such, and encouraged and guided to do so. The imposition of a specific duty will limit freedom in curriculum design and delivery.

Progression Steps will not sufficiently address individual learner needs. Key education stakeholders tended to raise this theme. There is a risk that Progression Steps will simply replace key stage assessments or targets, leading to a continuation of a target-driven learning and assessment approach. Respondents noted that this duty should be tailored to different communities and learner backgrounds, and that learners should not be hurried along the progression continuum or left behind if they don’t meet the ‘target’ of a Progression Step. In particular, queries were raised about whether this duty would lead to learners being placed into sets or streams earlier. In addition, concerns were raised that any such assessment approaches could impact on learner enjoyment of their education.

“We further note the difficulties already reported by secondary schools in dealing with the differences in prior experience and attainment among learners arriving from different feeder primaries. The proposals risk exacerbating the differences in progression and therefore the need for secondaries to accommodate different learner needs. Some teachers have informed us that the proposals could lead to setting learners earlier than is currently the case, which in practice can embed rather than reduce inequalities in outcome.” [Education practitioner]

Progression Steps won’t necessarily measure progress consistently and appropriately. Adopting a more learner-centred and flexible approach to progression along a continuum will create difficulties in comparing progress and places too much emphasis on teachers using their own judgement to assess learners’ progress and their potential.

There is a need to ensure appropriate accountability structures for achieving outcomes. Key education stakeholders tended to raise this theme. There is a need to reduce the risk of Progression Steps being used as new ‘targets’ for pupils to reach and which will be used to compare school-level outcomes. There is a need to avoid schools either pushing pupils too quickly through Progression Steps, or not setting sufficiently high expectations. As such, a national accountability system must be in place to ensure Achievement Outcomes are being set and moderated effectively.

“Accountability measures have to be clear and equally allow for this context driven curriculum. There does have to be an agreed commonality across schools to ensure equity of standards across clusters so that no pupil is disadvantaged by the capability of a school.”
[Education provider]

Parents should be engaged in the process of designing a curriculum and Achievement Outcomes and, in particular, some elements of the curriculum should not be imposed. Parents should have some input in their child’s progress and should retain final decision-making about certain elements of the curriculum (particularly RSE). This view is further discussed in the analysis of questions 6-9 on pages 27 – 38.

There is a need focus on other skills and learning, other than traditional curriculum learning, and on establishing core skills. Life and social skills are an equally important element of learning, particularly as not all learners will be progressing at the same pace. Initial education should focus on providing a strong foundation in core skills (such as literacy and numeracy).

Schools need support and resources to act on this duty. Schools need additional resources (financial, staff and time) and guidance from education partners to enact this new duty. There are concerns that this duty will place a significant additional burden on the education profession, within the context of existing budgetary constraints.

“The Governments role in providing the base curriculum and guidance should not be entirely delegated to schools that may already be stretched and understaffed. If schools see a clear benefit in modifying aspects of the curriculum they should consult with the Government regarding these changes.” [Individual respondent]

There was some criticism of the question as unclear or unnecessary. It was noted that the question wording is unclear or that this duty seems to be a self-evident requirement for schools and Funded Nursery Settings.

Additional themes raised by respondents self-identifying as organisations.

There has been a lack of consideration of how duty applies to Early Years providers and other partners. Organisations would value clarity on how the duty either applies to them as education providers and would value a discussion on the impact of the new progression approach on their pedagogical approaches. Education partners would like clarity on their role in supporting the new duty.

Question 3

What actions should the headteacher and governing body take to satisfy this duty?

There was a total of 413 comments in relation to this question.

Summary of the themes raised most frequently in consultation responses.

Effective management of resources will be paramount. Careful management of resources is needed to ensure changes are implemented correctly and without placing an

additional burden on teachers. This includes financial resources, staff capacity, teaching resources and staff knowledge, all of which will need to be dedicated to developing a new school-level curriculum. There were concerns that responding to this duty will be extremely challenging considering the existing limitations on school budgets and existing burden on teachers.

Support for teachers' professional development must be provided, including engaging them in the reform process. Key education stakeholders tended to raise this theme. Teachers will need to be provided with high-quality professional development opportunities, including informal learning opportunities and engagement in the reform process. This is to ensure that they can successfully adapt to the new curriculum approach, which is significantly different from the more prescriptive current approach, and to ensure teachers are able to adapt to new assessment approaches. This includes ensuring governors have the necessary skills to lead during the transition.

“Additional INSET dedicated to supporting and equipping them for the challenges involved. Support and insight from the challenge adviser in regard to preparation and planning compared to other schools.” [Education provider]

It is important to establish and adhere to clear accountability and evaluation processes. Key education stakeholders tended to raise this theme. Schools and wider education partners should establish effective structures to monitor implementation of the new curriculum and assessment arrangements, manage teacher performance, evaluate changes and monitor learner progress. Such structures will be central to the complex transition to a new curriculum and will reduce the risk of inconsistency across different schools and regions.

Headteachers and governing bodies should establish high educational standards and high expectations through effective leadership. Key education stakeholders tended to raise this theme. Policies and leadership should prepare teachers and learners to achieve high standards under the new curriculum. They should ensure that Professional Standards are prioritised across the school and that teachers and learners have high expectations in terms of the quality of education and learner progress.

“Establish the schools as Learning Organisations, ensuring high quality pedagogy. Distributive leadership across the school, in order for all staff to be a proficient leader in their responsibilities...High quality self-reflection at all levels will ensure a self-improving system.”
[Education provider]

Headteachers and governing bodies should encourage a school culture that supports innovation and adaptation. It is necessary to establish a school environment that supports excellence in teaching and learning, in which teachers can trial innovative approaches and teach without feeling driven by targets. This culture should ensure that the curriculum developed at school-level allows practitioners to be flexible, creative and innovative in their approach to teaching, to best meet pupil needs

A learner-centred approach to curriculum design and delivery must be adopted. Schools must develop a curriculum and pedagogy which focus on the needs and experiences of learners, ensuring learning is tailored and considers the ability of individual learners. This includes ensuring learners have equal access to high-quality education regardless of geography.

Schools should ensure that parents are engaged in the process and their views respected. Schools should inform and consult parents on proposed curriculum changes, respecting parental choice in terms of the type of education their child receives and valuing their input. Elements of the curriculum such as RSE provision should not be imposed against the will of parents.

It is necessary to focus on developing a clear and proportionate approach to assessment, centred on progression steps. Key education stakeholders tended to raise this theme. Schools, with the support of education partners, must establish clear mechanisms (based on progression steps) to assess and track learner progress and achievement, taking into account individual learner progress. There were concerns that there is still a lack of clarity regarding the nature of assessment within the new curriculum and there were concerns that adopting a new approach will place additional burden on teachers.

Schools should develop a curriculum which is comprehensive and relevant to learners. The new curriculum should be wide-ranging and should prepare learners effectively for future progression and to make a valued contribution to society.

Headteachers and governing bodies should develop clear and effective processes to plan and implement curriculum and assessment changes. They must take a carefully planned approach to implementing new curriculum and assessment arrangements in the school, including establishing appropriate timescales, supporting staff to develop curriculum ideas and lesson plans and ensuring governors and senior leadership are prepared to lead change.

Schools must have access to effective support networks to help meet this duty. Support for school-to-school working must be prioritised, as well as engagement between different education tiers (the Welsh Government, regional education consortia, local authorities) to support schools to satisfy this duty and establish consistency in the quality of education provision. Sharing guidance and good practice is an important element of such a support network.

General opposition to curriculum reform was raised on occasion by respondents. Curriculum and assessment reform was seen as unnecessary and/or unnecessarily burdensome on the education workforce.

Additional themes raised by respondents self-identifying as organisations.

Ensure learners are engaged in the process of developing the new curriculum and assessment approach, to ensure their well-being. The well-being of learners should be supported through providing them with a sense of ownership of their education. This includes engaging them in the process of re-developing the school-level curriculum.

“Enabling participation in the development of assessment for learning, of learning and as learning helps to ensure that assessment is experienced positively by children and young people rather than as a threat to their wellbeing.” [Education stakeholder]

There has been a lack of consideration of what should be expected of those responsible for provision in the Early Years / non-maintained sector. There has been a lack of consideration for the impact of the duty on this sector and, accordingly, consideration of the corresponding actions which key actors in the sector should undertake.

Question 4

What support would be required to enable schools to take those actions?

There was a total of 381 comments in relation to this question.

Summary of the themes raised most frequently in consultation responses.

Schools will need additional resources to support them to take action under the new duty. Key education stakeholders tended to raise this theme. There will need to be an increase in funding allocated to schools to allow them to deliver and evaluate a new curriculum and assessment approach. Schools will also need an increase in funding to ensure suitable staff capacity to undertake such work and to deliver suitable training. A key element of this is ensuring a sufficient and skilled workforce (including teaching support staff) to manage the increased workload, including improving teacher recruitment and retention.

Schools will need sufficient time to familiarise themselves with, and plan, the new curriculum. Schools will need a reasonable period of time in which to start trialling and implementing changes, allowing them to take a considered approach to implementation. Adapting to the new duty will take time and the process is complex; it cannot be hurried and needs to be incremental. Teachers will need sufficient time to understand the new requirements and develop and evaluate a new curriculum.

“Ensure all staff have sufficient directed time to create a purposeful, creative curriculum that embraces the design of AoLEs.” [Education stakeholder]

Professional development for teachers will be required. Key education stakeholders tended to raise this theme. Schools and other education stakeholders will need to provide support for practitioners’ professional development. Professional learning opportunities will need to increase to ensure teachers are equipped to design a curriculum and adapt new pedagogical approaches. Professional learning opportunities should be maintained as the new curriculum is phased in.

“This is a transformational shift and schools will need specialist professional learning, mentoring, skills-sharing opportunities and other support both in developing their localised responses to the new curriculum and in implementation. It is essential that the professional learning that is delivered to support the new curriculum uses the practices embedded in the new curriculum i.e. modelling the methods that will need to be seen within schools.”
[Third sector organisation]

Support from the network of education stakeholders. Key education stakeholders tended to raise this theme. Schools will need a strong, accessible support network (comprising other schools, local authorities, regional education consortia, Welsh Government and other stakeholders) to guide them through their new duty. This also includes specialist or expert support for certain areas of curriculum development (such as the sciences within the Foundation Phase and Key Stage 2 curriculum).

Sharing good practice and the provision of guidance. Key education stakeholders tended to raise this theme. Mechanisms will need to be established for sharing good

practice between schools and regions (such as case studies and visits) and guidance will need to be developed to support schools to implement this duty (such as templates, curriculum content guidance). Sharing good practice and guidance will need to be comprehensive and clear, in order to minimise the workload of teachers, avoid duplication of work and ensure a level of consistency in curriculum planning.

A robust approach to evaluation and accountability must be established at a national level. Key education stakeholders tended to raise this theme. A well-defined approach to evaluation and accountability will need to be established, to ensure good outcomes are achieved and to ensure consistent quality of education across Wales. Schools will need to be supported to evaluate any school-level changes.

Strong leadership and governance must be provided to ensure curriculum and assessment developments are given clear, detailed strategic direction. Key education stakeholders tended to raise this theme. There is a need for strong leadership from key education stakeholders (such as Welsh Government, regional education consortia, headteachers and governors) to drive change. This will ensure that good progress is made, and the schools feel confident in making changes within a clear framework.

An appropriate balance should be struck between detailed direction from education leaders, and freedom or flexibility for teachers to innovate. While it is important that clear, specific guidance is needed to support the development of appropriate and consistent curriculums, the core principle of allowing teachers the freedom to trial new approaches and adapt their learning approaches should be maintained. The experience and knowledge of teachers, and other education practitioners, should be trusted and respected.

“Clarity in terms of the core expectations of the curriculum (on a Wales-wide national basis) to ensure consistency across all schools whilst enabling individual settings to also develop contextually relevant curriculum that meets the needs of their pupils.”

[Education stakeholder]

Assessment arrangements must be made completely clear and sufficiently detailed to allow schools to develop their own assessment arrangements with confidence. Clear guidance and expectations should be provided to guide schools’ development of Achievement Outcomes and Progression Steps. It will need to be clear how Achievement Outcomes should look and how progress will be monitored consistently.

Parents must be engaged and allowed to support or provide views on the new curriculum arrangements. Parents should be informed about developments and engaged in the process of making important curriculum decisions which will have an impact on their children. In particular, elements of the curriculum (RSE) should not be imposed on parents without consultation. This theme is discussed further in the analysis of questions 6-9.

Opposition to curriculum reform was raised on occasion, or respondents commented on the need to focus on other types of learning, skills and support. Some of the responses emphasised opposition to curriculum reform in general and/or emphasised that other types of learning and skills (such as life skills and one-to-one support) are more important than curriculum reform.

Additional themes raised by respondents self-identifying as organisations.

Organisations provided more detail about expectations which should be placed on wide range of key education partners. Organisations, including key education partners, discussed in more detail the expectations which should be placed on key stakeholders within the education system. It was emphasised that schools are entitled to support from regional and national partners and appropriate structure for collaboration must be in place.

“Clarification of purpose and responsibility is essential if schools are to focus on these actions. The responsibilities of other parts of the education system including but not limited to the Welsh Government, Consortia, Local Authorities, Estyn, and Qualification Wales need to be clear. Schools need to be able to highlight quickly and effectively when they are not receiving the support they need from these agencies.”
[Education practitioner]

Organisations provided more detail on the nature of professional development opportunities which should be established. Organisations made the case clearly for a defined and organised regional or national approach to professional development, ensuring that all teachers are fully competent to deliver the new curriculum.

“Professional development opportunities need to be coherently planned, locally, regionally and nationally to ensure that all school staff are clear about the case for change, the scale of reform and their role in delivering this for our children and young people.”
[Education stakeholder]

Organisations provided more detail about the type of subject-specific support which would be needed, relevant to their areas of expertise. This includes noting the requirement to provide leadership development support and support to develop a new curriculum for particular subjects, such as the sciences, IT and religious education.

Careers and Work-Related Experiences

Question 5

Do you agree that age appropriate careers education and work-related education should cover the age range 3-16, in line with the AoLEs?

Response	Percentage (number)	Number who provided additional comments
Yes	36.7% (354)	121
No	46.9% (452)	180
Don't know	16.4% (158)	24
<i>No response to closed question</i>		14
<i>Total</i>	964	339

Among respondents who answered 'yes', or expressed agreement with proposal set out in the consultation document, the themes raised most frequently were as follows:

Respondents believe that careers and work-related education (WRE) will have a positive impact on students' future careers choices and aspirations. Careers education can demonstrate the relevance of learning to the wider world, helping to motivate learners. Awareness of careers and employability skills can be developed from an early age. The responses included references to international research that evidences that providing careers and work-related education in primary schools can help to broaden children's horizons, building their confidence and knowledge of possible career paths, and to nurture children's awareness of the breadth of opportunities open to them.

These respondents supported the idea of embedding work-related education across the six AoLEs, helping to develop learners' essential and transferable skills. It was suggested that the proposals could encourage more positive attitudes to learning and help develop entrepreneurial skills.

"...work-related education can not only bring the curriculum alive but also demonstrates more realistic expectations of the world of work for young learners. This can act as a motivating factor... If done in an age-appropriate way, careers education and work-related education should be central to efforts in developing well-rounded citizens."

[Education stakeholder]

A number of organisational responses made the link between the provision of effective (and age-appropriate) careers education and the vision for the new curriculum in Wales. Specifically, there are opportunities within careers education to support the development of ethical and informed citizens by raising awareness of, and introducing young people to, a wide range of career opportunities in different sectors, including the third sector and social enterprises. In addition, careers education and WRE should link to global citizenship education that can help develop skills that employers are looking for in the global economy.

Careers education and WRE can support greater inclusivity and promote equality, helping to challenge stereotypical thinking about gender roles and career choices. Respondents emphasised the importance of ensuring that learners know from an early age that any career is open to all genders. It is also important that this message is conveyed

from a young age so that girls and young women, in particular, can make informed choices about the subjects they choose to study during later stages of education. (It was also noted that the same applies for boys and young men, in terms of promoting career options in female-dominated sectors).

There is a need to build on the knowledge gained through previous research and initiatives delivered by organisations in Wales to promote girls' involvement in subjects where, traditionally, take-up has been low, notably STEM subjects. Respondents cited numerous previous programmes that have focused on this area, including a programme of support and training for primary schools which aimed to challenge stereotypes from an early age. Respondents noted that this was also key to supporting the purposes of the Curriculum for Wales.

"Factors that influence our careers decisions begin early, for example, our sense of identity and self-esteem can be influenced by how gender roles are presented from very early in life and certainly by nursery (e.g. gender stereotyping in the early years). Presenting positive role models and opportunities for a range of experiences that reflect the four pillars is essential." [Third Sector Organisation]

"...learning needs to be inclusive of the wide diversity of jobs in society, and avoid gender, racial or religious bias. It is important to develop new generations that see work as something they can enjoy as well as a way to earn a living, and to include less traditional roles – such as enterprise, alongside employment. [Third Sector Organisation]

Respondents put forward additional suggestions for curriculum content to further strengthen careers education and WRE. There is a need for schools to engage with employers and to work together in the planning and delivery of careers and work-related education. Employers can add value to curriculum delivery by supporting a range of activities, including aspiration days, workplace visits, enterprise days and a range of other engagements which, it was noted, help develop skills and prepare learners for the world of work.

"The evidence indicates that careers education and work-related education can play a useful role in helping to develop learners' essential skills such as problem-solving, team work, and communication which employers value as much as literacy and numeracy skills. Effective practice has also been evident where schools have enabled learners to understand the links between education, qualifications and careers."
[Education practitioner]

Respondents also noted the need for greater emphasis on workplace apprenticeships and the promotion of vocational subjects through careers and work-related education.

Some respondents expressed conditional agreement with the proposals. They agreed with the proposals but outlined potential issues relating to their implementation.

Work-related education should be age-appropriate and introduced at suitable stages. Some respondents felt that introducing work-related education for children from the age of 3 was too young (see further comments below on this issue from respondents who were opposed to the proposals).

Respondents indicated support for the proposals, on the condition that there were arrangements in place to ensure provision was relevant to the needs of the economy.

It was felt by other respondents that the proposals were acceptable, as long as parents were also included in discussions about the content of work-related education.

Finally, responses included support for the proposals on the condition that it was proportionally balanced with the rest of the curriculum and that careers education and guidance remained impartial and independent.

Those who answered ‘don’t know’ raised the following points most frequently:

Respondents included expressions of concern that careers education and work-related education would not be relevant for children in primary school. Some respondents were unsure the wide age-range of the proposal was appropriate (see further comments below on this issue from respondents who were opposed to the proposals).

During Foundation Phase and Key Stage 2 priority should be given to ensuring learners acquire other skills. Respondents believed that younger children should focus on acquiring basic skills before considering careers and work. (see further comments below on this issue from respondents who were opposed to the proposals).

Respondents highlighted concerns that incorporating careers education across the curriculum would overburden teachers. The majority of respondents who ticked ‘Don’t Know’ expressed concern that the addition of work-related education would overburden what is perceived to be an already crowded curriculum. This would impact on teachers’ ability to deliver the rest of the curriculum. It is believed that it would, in effect, demoralise teachers who could then decide to leave the sector.

Further, this concern is also coupled with the belief that its inclusion would overburden learners. Some respondents suggested that while career education is important, it should not be implemented to the detriment of academic achievement in other areas of the curriculum, and should not overburden children’s timetables:

“Careers education is important, but time spent on this should be a very small proportion of curriculum time.” [Individual respondent]

Respondents included suggestions that a lack of specialism in careers could lead to content being biased towards individual teachers’ own knowledge of the local economy, rather than providing more rounded and impartial provision. Several respondents highlighted concerns that work-related education could be biased based on the employment experience of the teacher delivering the curriculum. Thus, learners would only be exposed to the narrow experience of the teacher and not introduced to a broader spectrum of options.

In addition, it was also suggested that the curriculum would focus on the needs of the local economy; for instance, learner would centre on agricultural careers if the school is based in a rural area. This would prevent learners from being exposed to other potential careers which exist outside of their local area and do not contribute directly to the local economy. This concern is connected to the fact that children would be prepared for jobs which might not exist when they entered the work place, and their education would not be wide-ranging enough to accommodate jobs or careers which do not exist now but will exist in the future.

Among respondents who answered ‘no’, or expressed concern, the themes raised most frequently were as follows:

Careers education is not appropriate for young learners in the Foundation Phase. The main line of opposition to the proposal revolved around the age learners should be when introducing the idea of work and careers. Many respondents believed that younger children should not be required to think about ‘adult’ matters of careers and life beyond education. From within this group of responses, most opposition was directed at the inclusion of learners aged 3-11. It was suggested that children in the Foundation Phase and Key Stage 2, particularly children aged 3 years, were far too young to understand the concept of a career. Teaching and learning in the Foundation Phase, it was argued, should be focused on acquiring basic skills such as language, numeracy, and social skills before introducing the idea of careers and work. However, several respondents extended this age-range to those in Key Stage 3, prior to learners choosing and undertaking GCSEs.

“During their formative years, children have no concept of a career, nor its broader implications.” [Individual respondent]

Several respondents also expressed the concern that introducing work-related education would risk children being ‘pigeon-holed’: that they would be categorised and restricted in the career choices and this would have a negative impact on the child’s overall development.

It should be the responsibility of parents to guide and educate children on their careers, rather than the school or the government. Several respondents opposed the proposals on the basis that it was the responsibility of parents and guardians to guide and advise on children’s career choices, and that the government should not be involved with this area.

Additional themes raised by respondents self-identifying as organisations.

Careers and work-related education risks being seen as a lower priority by schools under the new curriculum arrangements. ‘Career management competencies’ are not included in the ‘wider skills’ listed on page 22 of the White Paper. It was noted that Estyn has reported weaknesses in careers advice and guidance and too much variance in the time dedicated to implementing the Careers and the World of Work Framework. Organisations argued that careers guidance should be a statutory part of the new curriculum.

“unless guidance is made statutory this trend will continue and may be exacerbated by the increased expectation of delivery by non-specialists within AoLEs”. [Education stakeholder]

A lack of clarity and consistency in terminology used in the consultation document.

The following terminology is used in the White Paper: *Careers and Work-Related Experiences, careers education and work-related education, work-related learning*. It was suggested that this may cause confusion among non-careers specialists. In addition, it was noted that it is unclear what is meant by ‘age appropriate’ careers education.

There is a need to clarify how the Gatsby Good Career Guidance Benchmarks will link to the planned guidance for careers and work-related education. The Benchmarks will be piloted with a view to being used to drive improvements across Wales, however it

was suggested that the status of the Benchmarks (which are statutory in England) should be clarified.

Relationships and Sexuality Education

Question 6

Do you agree with making age and developmentally appropriate RSE compulsory for 3-16 years? Please give reasons.

Response	Percentage (number)	Number who provided additional comments
Yes	10.2% (166)	92
No	87.5% (1428)	512
Don't know	2.3% (38)	19
<i>No response to closed question</i>		21
<i>Total</i>	1632	644

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

Society is driving the need for compulsory RSE. Expectations for the development of responsible citizens is a key driver for the delivery of compulsory RSE; with the need for tolerance in society providing a rationale for learning about healthy relationships and issues affecting learners' future participation in society.

Specific topics need to be included in the delivery of RSE. Responses supporting compulsory delivery provided detail for specific content e.g. the inclusion of 'consent', 'respect' and 'healthy relationships' needed and the possibility of drawing on the expertise of appropriate outside agencies. Respondents referred to the Health and Well-being AoLE as an appropriate delivery mechanism for RSE.

"It needs to be more than the previous basic sex education, it has to cover relevant topics such as consent and relationship information. It is important that parents and governors should not be allowed to restrict this information." [Individual respondent]

Appropriate training for teachers, and teaching resources are required. Key education stakeholders tended to raise this theme. Professional learning for teachers and teacher trainees will ensure consistency within and between schools across Wales. This would improve teachers' confidence to deliver sensitive topics. Clarity of expectations for delivery also need to be explicit for schools to be confident and suggested guidelines followed; a minimum standard could be considered; and clear guidance for schools regarding what is age and developmentally appropriate for learners. The development of Welsh language resources is also required. The input from experts (specialist organisations) could also support subject content delivery.

RSE content needs to be age and developmentally appropriate for all learners. Key education stakeholders tended to raise this theme. Respondents emphasised the importance of guaranteeing that the content delivered is both age and developmentally appropriate. The approach adopted also needs to meet the needs of each individual setting, and at the same time support learner's individual life choices; it would be useful to share examples of good practice. It is important to make sure parents are consulted on the specific subject content and information is delivered to learners in an impartial manner.

“It is essential that it is set in a holistic context of healthy relationships and that parents are provided with the opportunity to understand that it relates to a much wider range of subject matter than previous iterations of this element of the curriculum.” [Education stakeholder]

Mandatory delivery of RSE will safeguard children. The delivery of good quality RSE will ensure that children are able to ‘speak out’, should the need arise, thus providing an important tool to safeguard children. RSE will ensure children develop their understanding of relationships and sexuality.

Additional themes raised by respondents self-identifying as organisations.

Specific curriculum content was recommended for inclusion in RSE. Human rights and equality issues should have a prominent role within the subject content of RSE. Other more focused topics were also noted such as ‘pregnancy’ and ‘consent. In order to develop resilience, there is also a need for mental health to be awarded equal status to RSE.

Delivering mandatory RSE will support the United Nations Convention on the Rights of the Child. Ensuring RSE is a mandatory element of the curriculum fulfils the provisions of the UNCRC providing children with accurate information which will contribute to their future decision making.

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

Parental’ responsibility and the right to withdraw needs to be retained. Parents and not schools should decide on whether their child is taught RSE; the right to withdraw needs to remain and the rights of parents need to be assured. Parents understand the developmental stage of their child and need to be able to decide what is appropriate and at what age. This would also allow for any beliefs parents hold to be taken into consideration and for parents to bring their children up as they wish. Parents should have the responsibility of teaching their children RSE topics; ‘one size fits all’ is not appropriate.

“RSE should normally take place inside the family unit, taking into account that family’s religious and moral beliefs. The school should only step in when there is a clear breakdown at home.” [Individual respondent]

Children are too young to understand the topics in compulsory RSE. There was a range of responses regarding the exact age it would be appropriate for children to experience RSE. Early Years and Primary school aged children were considered too young to understand RSE topics. The materials delivered were thought to be inappropriate for younger children, this could cause children to become confused, during a stage in their development where there should be a focus on ‘play’. There is also limited contact time during the nursery stage for such delivery. RSE should be led by children asking, instead of delivering a curriculum to children too early in their development. Upper primary and secondary school is a more suitable age for children to experience RSE. Other areas of the curriculum, such as literacy and numeracy, life skills and subjects with a more academic focus were suggested for schools to prioritise.

“Whilst children should learn about families, caring friendships and respectful relationships this does not need to include sexuality education. However, focusing sex education at

secondary school through the lens of relationships education is a very positive change.”
[Individual respondent]

Children need to be allowed to be children and experience an innocent childhood.

Delivering RSE to very young children would take away the innocence of their childhood. Respondents proposed that such topics should be taught much later either in school or by parents. During their childhood children should not be exposed to inappropriate materials, there are social pressures for children to become sexualised and children must be able to enjoy their childhood.

“Young children should be allowed to have a childhood free from sexualisation. Parents can best decide what and when to discuss such things with their children. Ideas of what constitutes a family and the relationship between biological sex and gender are contested areas. Children should not be presented by schools with ideas in these areas when they are too young to consider the issues critically.” [Individual respondent]

Children experience social pressure to be sexualised and schools should not add to this. Children experience social pressure from the media and society regarding sexualisation and it is important that school does not add additional pressure to this by exposing children to ideas they do not understand and are inappropriate.

“Media and society seem to exert huge pressure on children in terms of sexualisation / exposure to inappropriate material, but while children are too young to think critically through the issues, confronting these pressures directly leaves children no space in which to escape. The role of the school should be more subtle / supportive, modelling positive behaviour rather than focusing directly on issues which children are arguably not yet ready to tackle.” [Individual respondent]

Schools have an important role in deciding the content taught. Schools and governing bodies, along with consultation with parents, and their knowledge of their local community can make informed decision regarding the nature of the content taught.

“Regards [to] primary schools, I believe the schools themselves should be able to decide whether sex education will be provided, and if so, only suitable age appropriate material should be used as it is very important that children are allowed to be children. Keeping control within the school and with the school governors allows for the parents to be more fully involved with the syllabus. It is very important that teachers are not compelled to teach something that they morally are not in agreement with.” [Individual respondent]

Teachers may be forced to teach about issues that oppose their own beliefs.

Teachers' rights must also be considered. Teachers should not be forced to teach topics they do not agree with; their freedom of conscience needs to be considered. As a consequence of being forced to teach material they are opposed to some teachers may decide to leave the profession.

Question 7

Do you agree with the proposed changes to the guidance making power so that it is designed to secure that RSE is provided in a way that is age and developmentally appropriate to the children receiving it?

Response	Percentage (number)	Number who provided additional comments
Yes	22.9% (236)	76
No	64.1% (661)	233
Don't know	13.0% (134)	32
<i>No response to closed question</i>		14
<i>Total</i>	1031	355

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

Ensure a learner-centred approach to RSE curriculum design and delivery. Key education stakeholders tended to raise this theme. Schools and teachers need to ensure that the individual needs of learners are met and ensuring age and developmentally appropriate content is important. Working with learners to develop such resources can be effective. Issues must not be presented that are unsuitable for the learner's age.

"In line with the 'whole school approach' the curriculum needs to be co-produced with children and young people to ensure that it connects directly to what children and young people are experiencing around them. This ensures that content is developed with and for young people, attuned to children and young people's evolving capacities, enabling all children and young people to see themselves and each other in what they learn."

[Education stakeholder]

Guidance for schools is important. Key education stakeholders tended to raise this theme. With sensitive topics to be delivered, care is needed regarding how these topics will be taught. Expert input is required to develop guidance, and this would provide opportunity to engage with parents and learners as well. Further guidance to support the delivery to ALN learners was also proposed.

"... age will still be a factor in making decisions around provision, schools will need to consider the physical and cognitive development of their learners, including taking into account the experiences of learners when making decisions regarding planning RSE content. There should also be appropriate consultation with key stakeholders in the preparation of this guidance." [Education stakeholder]

Teachers will need further professional learning. Due to the sensitivity of the issues covered by RSE, teachers will need access to training and appropriate resources to ensure the delivery of "*the high-quality learning experience their pupils deserve*".

Parental involvement is important. A few responding 'yes' noted that parents' views and rights were still important, and their beliefs should be considered.

Additional themes raised by respondents self-identifying as organisations.

Existing expertise should be sourced to develop specific curriculum content.

UNESCO's guidance provides clear progression and guidance, which could be used by schools to support their RSE planning.

Among respondents who answered 'no', or expressed particular concerns, the themes raised most frequently were as follows:

The role of parents was viewed as very important. Parents should be able to decide what is best for their child, it is their responsibility to decide what is appropriate for their child to learn. Therefore, parents need to be informed of the content of the curriculum and parents need to retain their right to withdraw their child if they wish. Parents understand what is appropriate for their child, depending on their age and rate of development. Parents need to be consulted regarding the proposals to ensure a fully inclusive approach is adhered to.

"Parents need the right to withdraw their children from RSE lessons. We still have the right to withdraw our children entirely from schools and home-school them. It is hypocritical to say parents can't choose to withdraw their children from certain lessons."

[Individual respondent]

Children are too young to understand the topics in RSE. Respondents noted that teaching RSE from the age of 3 was not appropriate. Children mature at different rates and the delivery of topics needs to be sensitive to this. Children's childhood innocence needs to be preserved, they may find the topics taught confusing. It is important to ensure the topics are age and developmentally appropriate, but who is able to decide this as children develop and mature at different rates. Anything decided centrally would not be as effective as individual school governing bodies deciding what is appropriate for their learners, along with input from parents. Respondents proposed different ages for children when they believed the delivery of RSE would be acceptable. Some noted that including RSE is acceptable once children are in secondary school, with others commenting that children needed to be older than 16 years before being introduced to it.

"I think "age and developmentally appropriate" is a subjective statement. What one person thinks is age appropriate could be contrary to the values and views of someone else."

[Individual respondent]

Teachers' beliefs must also be considered. Teachers need to be confident that they will not have to teach issues that are not compatible with their own personal beliefs.

Freedom of religion needs to be respected. The curriculum content may conflict with parents' beliefs, and the principles and ideals associated with a family's religion should be respected. The teaching of RSE could infringe on these beliefs.

Concerns were raised about specific RSE curriculum content. An over emphasis on 'sexuality' is not required as this is not age appropriate and the inclusion of LGBT content also raised cause for concern for some parents who felt this topic was inappropriate to introduce to young children. Topics need to be applicable to the local community and

receive approval from the parents. Some of the current material delivered to children is inappropriate, particularly sexually explicit material for primary-aged children.

It is important to note that some respondents misinterpreted RSE to mean RE and focused their comment on Christianity needing to be the main focus for RE in schools.

Question 8

Do you agree with our proposals to make RSE optional for learners in sixth forms?

There were a total of 1177 responses to this question. Unlike other comparable questions in the consultation, this question did not provide respondents with the option of answering a closed question with a series of options (Yes / No / Don't Know). Nevertheless, 950 responded 'Yes', 140 responded 'No' and 18 'don't' know'; the remainder did not include a clear 'Yes/No' in their response; 179 respondents provided additional comments.

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

Learners are now mature enough to make their own decisions. By sixth form learners have matured and can make their own decisions, and they have also received relevant content earlier in their education. The curriculum content should have been covered earlier in school; not all learners stay on to study in sixth form. Learners need to be assured that their choices are respected, and they are never forced to study a subject they do not wish to undertake. Some 'drop-in' / 'optional' sessions for topics could be an applicable approach. Learners are at a critical stage in their development and the topics covered would be supporting this, and this age is more suitable for such topics than earlier in school.

"Sixth formers should be allowed to specialise in areas of interest to them where they have time to learn and develop their interests in depth." [Individual respondent]

There must still be access to relevant support services for sixth formers. Even with RSE being delivered as an option, it is expected that external agencies will be signposted to sixth formers, in order to provide advice and support, recognising young peoples' independence and autonomy at this age.

"It is important that young people in this age group still have access to relationship and sexuality support from their school whether or not they are formally accessing RSE. School services designed to support young people experiencing challenges with relationships and sexuality need to also be developmentally appropriate and accessible to all students. It needs to be clear to young people of all ages what support is available and how they can access it." [Third Sector Organisation]

Parents should still be consulted. Parental support and engagement with any decision is still required, and parents should still have the right to withdraw their child from RSE.

The Welsh Baccalaureate could support the delivery of content. There were suggestions for RSE to be included within the Welsh Baccalaureate content. Delivering the Welsh Baccalaureate as an optional qualification instead of being compulsory was also raised.

Academic studies should be the main focus for learners during sixth form. All aspects of sixth form should be optional, the competition for university places should be the priority and learners should be able to focus on their academic subjects.

Additional themes raised by respondents self-identifying as organisations.

Optional RSE in sixth form reflects the new curriculum arrangements. Schools should still be able to deliver RSE taking into consideration learners' views of their expectations and preferred subject topics.

Among respondents who answered 'no', or expressed particular concerns, the themes raised most frequently were as follows:

RSE topics are important for sixth formers to learn. Young people are vulnerable at this age and additional guidance and support would be of benefit. Some learners may be struggling with particular issues regarding their sexuality and maintaining compulsory RSE in sixth form may be a viable option. If the topics are worth teaching, they should be relevant to all learners, and during sixth form RSE is particularly important, as relationships are developing at this age. There could be an option to deliver some mandatory sessions for aspects such as 'consent'. Learners should not be able to opt out at this age, later experiences in adulthood, society and the workplace underline the continued need to deliver compulsory RSE.

"No. I would have thought that most people would consider this to be the very age that young people would need to be provided with guidance of this nature and particularly in the complicated world we live in, to be told what is and is not appropriate in the way of sexual encounters and the consequences of underage sex, the necessity of consent, the dangers of pornography and so on." [Individual respondent]

RSE is important for the development of informed citizens. Social pressures were emphasised as providing the rationale for the need for learners to continue to be educated in RSE during sixth form.

There needs to be consistency with earlier RSE learning. If RSE is worth delivering, then there needs to be continuity with earlier education experiences and consultation with parents applies to this consistency too. If it is not compulsory, learners of this age are more likely to opt-out. A progressive curriculum would enable sixth formers to develop their knowledge further.

Additional themes raised by respondents self-identifying as organisations.

Compulsory RSE in sixth form supports the United Nations Convention on the Rights of the Child. Aspects of RSE are more age and developmentally appropriate for sixth form learners than when they are younger; learners' needs differ as they are now over the legal age of consent. The curriculum content should be 'needs led'. If the right to withdraw is retained for 3-16 year olds, mandatory RSE delivered during sixth form may be the only opportunity for some learners to receive such education.

"The right of parents to withdraw their child from sexuality education must be counterbalanced against the right of young people to receive a full education and to make their own decisions about what they learn." [Third Sector Organisation]

Religious Education

Question 9

Do you agree with the proposed approach to RE?

Response	Percentage (number)	Number who provided additional comments
Yes	22.5% (242)	72
No	63.7% (684)	323
Don't know	13.8% (148)	26
<i>No response to closed question</i>		27
<i>Total</i>	1074	448

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

Learners need to be prepared for a diverse and multicultural society. RE prepares learners for the multicultural nature of society, this includes understanding different faiths. Respondents noted the importance of children developing tolerance, acceptance, and learning about more than one religion can also encourage critical thinking skills. Including non-religious views resulted in mixed responses, as it demonstrates 'compliance with Human Rights and UNCRC' on the one hand, whereas others noted non-religious worldviews should not be included.

"RE should be limited to Christianity and other world religions, not non-religious worldviews such as Humanism. There are enough opportunities to raise non-religious perspectives in the rest of the curriculum." [Individual respondent]

There is a need to modernise the content of RE. The delivery of RE as part of the Humanities AoLE was supported, with RE requiring parity with the other Humanity subjects. It was commented that the Health and Well-being AoLE also has reference to spirituality. There is potential to explore philosophy and ethics as the route for subject content, potentially an alternative name – as 'RE' fails to encompass all the content (e.g. morality, ethics). Some respondents suggested alternative titles including 'Religions and Worldviews; Beliefs and Values; Ethics'.

"In line with encouraging 'wider skills' such as critical thinking, religious viewpoints should be subject to reasoned challenge, particularly where religious viewpoints are presented that contradict fundamental human rights, in particular relating to equality. RE is valuable at all ages from nursery onwards. Schools should be required to ensure that religion is explored from not just a Wales or UK perspective but from the perspectives of people from around the world who hold those beliefs. We believe this approach should apply equally in faith schools." [Third Sector Organisation]

Professional development is important to ensure teachers understand the subject's requirements. Key education stakeholders tended to raise this theme. Respondents commented on the expense of resourcing RE and the importance of delivering quality staff development. RE subject specialists are needed across Wales to support this, with primary teacher training courses also including focus on RE. Guidance is needed to support

practitioners' interpretation of 'age and development appropriate', and examples of good practice should be made available to support improvement. There are implications for training particularly for the Foundation Phase, as there needs to be consistency between Early Years and other age groups.

Additional themes raised by respondents self-identifying as organisations.

It is important for RE to be given statutory status. Key education stakeholders tended to raise this theme. RE must not get lost within the Humanities AoLE, it is important for it to be identifiable at all ages in school, particularly in light of the 'right to withdraw'. RE teaching must not be confused with recounting historical events but focus on understanding Christianity and other world beliefs and non-religious views; consistency across Wales needs to be assured and terminology in the legislation must be clearly defined. Voluntary aided schools should ensure the RE element of the Humanities AoLE is taught in addition to their denominational RE.

There needs to be consistency in the Welsh language terminology for non-religious. 'Nad ydynt yn grefyddol' should be adopted as the Welsh term for 'non-religious', to ensure consistency across education.

Among respondents who answered 'no', or expressed particular concerns, the themes raised most frequently were as follows:

A clear focus on Christianity is needed. Christianity needs to provide the main focus for RE, due to the significance of Christianity to the history and heritage of Wales, and as a reflection of today's society. The apparent lack of understanding of Christianity in society provides motivation for this focus.

"This country was founded on Christianity and it is still the main religion of the majority of people therefore Christianity should be the main focus of teaching in this area and not a mish-mash of many beliefs that will only confuse children. At least 58% of people in Wales declare themselves to be Christian and receiving teaching of this is fundamental for them to understand how and why their country developed in the way it has." [Individual respondent]

Views were mixed regarding the inclusion of a range of faiths and non-religious views in RE teaching. It was proposed that by including a range of different faiths in RE teaching, this could cause confusion for children. Whereas, others supported including other world religions in RE, with the subject not including 'other philosophies' / 'non-religions'. Clarification proposed that RE is about religion 'not about non-religious belief'. Humanism was singled out as not appropriate to be included in RE teaching.

Parental rights need to be respected. Parents understand how best to approach RE with their children and the right for parents to withdraw their child from RE needs to be assured. Parents' beliefs must be considered and for some parents they would prefer to teach their child about their religion.

"The parents should be notified of the defined curriculum and should be their choice to let the child in the class or not. The parents should be able to understand the way the schools will teach RE to a 3 year old and a 12 year old." [Individual respondent]

RE should not be compulsory. Parents and learners should be able to choose to study RE, this is particularly important for older learners (14-16 years); as there are limited

choices available for GCSE options and forcing RE delivery here results in learners unable to study other subjects. Nursery-age children are too young to be included in compulsory RE. They are unable to understand the issues and are not in nursery long enough to include compulsory RE along with other curriculum requirements that need to be delivered.

RE should be part of the Humanities AoLE. RE can be covered within all aspects of Humanities and the subject needs to be viewed as an opportunity to develop learners' skills in 'research, debate, and discussion'.

Question 10

Do you agree with our proposals to make RE optional for learners in sixth forms?

Response	Percentage (number)	Number who provided additional comments
Yes	63.1% (640)	147
No	23.9% (243)	78
Don't know	13.0% (132)	18
<i>No response to closed question</i>		20
<i>Total</i>	1015	263

The majority of all responses to this question, provided limited additional information beyond emphasising their agreement/disagreement reflecting their Yes / No response.

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

Learners are mature enough by sixth form to make their own decisions. It is important that learners are able to make their own decisions about they want to study during sixth form. By the age of 16 years learners are mature enough to choose whether they access RE or choose an alternative. A small number of respondents commented that the decision needed to be taken in partnership with parents and learners.

"Sixth form learning is necessarily limited in scope given the need to specialise to some degree. Those genuinely interested can find multiple ways of informing themselves on religious matters. School input is not necessarily the best and most effective of these."

[Individual respondent]

There needs to be parity between the learning experiences of those in sixth form and those attending Further Education Colleges. Key education stakeholders tended to raise this theme. Learner choice is important at this age and there needs to be equity with the learning experience in FEIs. RE provision prior to sixth form on different religions and beliefs is sufficient.

During sixth form learners need to focus on their academic subjects. Learners need to be able to focus on their Post-16 subjects. Learning between 3-16 will have provided learners with sufficient knowledge and understanding in RE. Compulsory subjects are not needed at this stage in a learner's education; this would provide flexibility for schools to be

able to develop and deliver relevant activities to address 'ethical' issues, should they be required.

"Because if everyone follows the recommendations learners will have had a substantial introduction along their journey up to 16. Time to specialise in areas of their choice."
[Translation] [Individual respondent]

In consultation with learners there should be supportive guidance available during sixth form. Enhancement of the curriculum could be provided, following consultation with learners, in order to reflect local priorities. It was commented that learners would still need access to appropriate support and guidance. Strengthening the Welsh Baccalaureate Qualification could support such delivery.

Additional themes raised by respondents self-identifying as organisations.

There should be an option for learners to gain a RE qualification. Should learners wish to complete a qualification in RE during sixth form this should be available to them.

Quality of delivery needs to be guaranteed should RE be delivered. It is important that sufficient guidance is provided to ensure the quality of RE for sixth formers.

Among respondents who answered 'no', or expressed particular concerns, the themes raised most frequently were as follows:

RE should be taught throughout each stage of a child's education, including sixth form. Delivering Christianity curriculum content during sixth form, supports the values of the society. Learners are more able to understand topics covered and be able to discuss concepts as they are older. If the subject is made optional it could imply that it is not important. Learning about different beliefs is important to ensure there is respect in society.

"Young people will also be exposed to new people and new ideas as they embark in the workplace or university and beginning to examine these in safe and familiar surroundings can only be beneficial in preparing our young people for life after sixth form/FE."
[Individual respondent]

There is still a need for young people to receive guidance during sixth form. A few responses emphasised the need for RE to remain compulsory during sixth form, or that there was no need to change the current guidance, as the transition to adulthood is a critical time when moral guidance is still needed. Potential to incorporate RE within the Welsh Baccalaureate was suggested as a possible means for learners to develop deeper understanding.

"I think it is regrettable to talk of allowing this when the sixth form is the very venue where issues of faith/science can be intelligently discussed." [Individual respondent]

Improved guidance for sixth form provision is needed. Current guidance is broad and there is a need for this to be strengthened.

RE should not be taught during sixth form. A few respondents qualified their negative response, specifying that they were objecting to the teaching of RE in sixth form, regardless of whether it is optional or compulsory.

The Right to Withdraw from RE and RSE

Question 11

Should the right to withdraw from RE and RSE be retained?

Response	Percentage (number)	Number who provided additional comments
Yes	88.7% (1421)	438
No	9.2% (148)	73
Don't know	2.1% (33)	10
<i>No response to closed question</i>		33
<i>Total</i>	1602	554

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

The rights and responsibilities of parents need to be respected and retained. Key education stakeholders tended to raise this theme. Parents' understanding of their own child's development and maturity means parents are best placed to decide what is appropriate for their child to learn and at what age they should learn it. Involving parents in the decision, by including sharing lesson content with them, means parents can ensure their children are not taught information/values that oppose the parents' beliefs/religion. A trusting relationship between school and parents is important. It may be that parents wish to withdraw their child from particular aspects of content. Parents have ultimate responsibility for their child and their right to withdraw their child should remain.

"Children are not able to make decisions at school age on subjects such as this as they have very little understanding of what it will involve and will often just follow their peers."

[Individual respondent]

The European Convention on Human Rights supports the rights of parents. It is not appropriate for the government or school to force any curriculum on children, this is reflected in the European Convention on Human Rights, and the views of parents should be respected. The Education Act (1996) was also cited; referring to pupils being educated in accordance to their parents' wishes.

Specific RSE subject content may confuse young children. Elements of RSE could confuse young children, and parents are in a better position to teach younger children. The sensitive nature of some of the RSE topics involved means parents views must be considered. However, there were mixed views regarding what the subject content for RE and RSE involved e.g. RE – 'factual information', RSE – 'personal values and beliefs' or RSE 'factual information and religion or culture would not provide reasons for withdrawal'.

The right to withdraw should be addressed separately for RE and RSE. A number of responses addressed RE and RSE separately, responding with mixed views; e.g. RE - should remain compulsory; RSE – should be optional / RSE – should be mandatory, in some cases more detail was proposed e.g. breaking the right to withdraw down by age; such as RE compulsory up to 16 years and RSE compulsory for sixth formers.

An increase in home schooling may result if the right to withdraw is removed. If the right to withdraw is removed, schools may lose the support of parents and the decision may prompt some parents to home school their children.

Additional themes raised by respondents self-identifying as organisations.

There is support for parents' right to withdraw. Respondents approved of retaining the right to withdraw and parents' engagement with their child's education. Sharing curriculum content with parents should be encouraged, and a robust process is needed for any request to withdraw. This would ensure parents are fully informed and aware of the impact on their child's education, evidence was cited; involving parents in curriculum discussions means they are less likely to withdraw their children (e.g. this could take the form of a parent council in a school).

"Delivery would clearly need to be age and development appropriate. A key element of this will be around promoting the benefits of this to parents and families to ensure they have a clear understanding of what is being delivered and how. Resources to support in this area would be welcomed by the sector whether the right to withdraw remains or is removed."
[Early Years Stakeholder]

Concerns raised about the practicalities of withdrawals with the new AoLE delivery approach. Delivering the curriculum using AoLEs may make it difficult to meet any request for withdrawal, due to the integrated approach to the proposed delivery for the new curriculum. Particular elements of RE and RSE are very important for all children's safety. A full understanding of the current numbers withdrawing and the consistency of approach across Wales is needed. The rights of teachers to withdraw also need to be considered.

Among respondents who answered 'no', or expressed particular concerns, the themes raised most frequently were as follows:

If learners are withdrawn this will negatively impact their access to a broad curriculum. Key education stakeholders tended to raise this theme. If RE and RSE are compulsory, learners will experience a range of topics, broadening their knowledge about the world. There are expectations for the new curriculum to drive learners' appreciation of a breadth of perspectives and this is to be delivered with an integrated approach. However, there may be disagreement as to the exact content of the RSE/RE to be delivered. Delivering the information in school is 'a safe place', as opposed to learning it 'outside'.

"Children must be exposed to a wide range of ideas and attitudes so that they can learn to think critically and come to their own conclusions. If we allow withdrawal, we are preventing this." [Individual respondent]

Children need to learn about RE and RSE topics to be able to participate in an inclusive society. Having RE and RSE as compulsory subjects would positively impact the development of individuals, contributing to their understanding and participation in a diverse and democratic society. The new curriculum and RE emphasise the role of an ethically informed citizen; with RSE focusing on positive relationships. Children have a right to access important education and parents should not be able to withhold that right based on their own personal views.

There will be staffing and curriculum implications if learners are withdrawn from RE and/or RSE. There will be staffing implications to ensure all learners are taught, including

those being withdrawn from lessons. There will be a wider impact on the educational offer if learners are withdrawn from the new curriculum; as the new curriculum requires RE to be embedded and delivered in a more thematic way. If the right to withdraw remains schools will encounter challenges to deliver RE in an integrated way.

RSE and RE subject content need to be age appropriate. Education is optional for children younger than five and as long as material is age appropriate parents will not withdraw their 3-5 year old from RSE/RE.

Additional themes raised by respondents self-identifying as organisations.

Withdrawing learners from RE and RSE opposes children’s rights. Withdrawing from RE and RSE is viewed as contrary to the UNCRC and ECHR, and the integrated approach of the new curriculum could mean that learners would not have access to other areas of the curriculum if withdrawn. There is support for RE and RSE to be compulsory, with anecdotal evidence of withdrawals being based on prejudice about other religions; stronger guidance for schools to help deal with such withdrawal requests was proposed. Stronger guidance regarding the separate requirement for collective worship was also suggested.

RE and RSE are key to developing ethical and informed citizens. The topics included in RE and RSE promote important life skills and will enable learners to value diversity and inclusivity.

Learners have limited understanding of ‘healthy relationships’ and RSE should be compulsory. The existing limited understanding learners have of ‘healthy relationships’ is highlighted, and compulsory RSE should be delivered by staff confident and able to engage with the differing cultural issues. Effective engagement with parents would address any concerns parents may have on any compulsory content.

“Whilst we recognise the importance of education around RE and RSE, we understand that this is a sensitive area, and therefore can see why the right to withdraw might be considered reasonable. However, we also think that it is important to retain “breadth” for all learners as well as being mindful of the wishes of parents.” [Education stakeholder]

Question 12

If the right to withdraw is to be retained, should it remain with the parent (parent includes those with parental responsibility or those who have care of the child)?

Response	Percentage (number)	Number who provided additional comments
Yes	90.9% (1443)	433
No	5.3% (84)	44
Don't know	3.8% (60)	25
<i>No response to closed question</i>		37
<i>Total</i>	1587	539

The majority of additional comments re-emphasised agreement with the right to withdraw remaining with the parent, many referred to/reaffirmed their response to question 11.

Among respondents who answered ‘yes’, or expressed neutral or positive views, the themes raised most frequently were as follows:

Parents need to retain their rights to withdraw their child. Key education stakeholders tended to raise this theme. Parents should be in control of their child’s learning, particularly at a young age. When children are older, they may make their own decisions (e.g. range of ages suggested aged eight; older than 15; sixth form). Parents understand their child’s development and whether they are mature enough to understand subject content. The European Convention on Human Rights and Education Act 1996 were quoted and referred to in supporting these parents’ rights.

“Some sex education views will conflict with parent’s conscientious convictions therefore it is vitally important that the right to withdraw their children is maintained.” [Individual respondent]

The learners’ views also need to be considered. Key education stakeholders tended to raise this theme. Even with parents retaining the right to withdraw, the views of children need to be taken into account and there should be agreement between parent and child. Criteria established in school policy would need to be met. The decision must not rest solely with the learner, nevertheless the views of older children need to be considered.

“The right to withdraw should remain with the parent but could be expanded to allow children/learners who display sufficient competence to make that decision for themselves. This should therefore be discussed openly with both the child and parents where possible.” [Early Years Stakeholder]

There are differing views regarding the right to withdraw for RE and RSE. Differences between RSE and RE preferences (similar to those noted in question 11) were raised. RSE should be compulsory, whereas RE optional; alternatively, RSE delivered in the home and RE in school.

The implementation of any withdrawals will need to be managed. The current right to withdraw should be amended to ensure parents provide alternative learning for their child.

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

The views of learners need to be considered. Key education stakeholders tended to raise this theme. Respondents noted that the views of learners, particularly over the age of 15 years, needed to be taken into account, as learners should be able to make the decision themselves. This would support the UNCRC, recognising learner’s maturity to make decisions.

RE and RSE need to be compulsory. Delivering mandatory RE and RSE would ensure all learners receive a ‘broad and balanced curriculum’. Some responses reiterated the need to look at RE and RSE separately regarding the right to withdraw.

Question 13

If the right to withdraw is removed, what alternative, if any, should be in its place?

There was a total of 479 comments in relation to this question.

The themes raised most frequently were as follows:

The right to withdraw needs to be retained. Key education stakeholders tended to raise this theme. The importance of retaining parents' right to withdraw was confirmed with the acknowledgement of children's rights also raised. The need to respect families' religious beliefs was also mentioned.

"The right to withdraw should remain with the parents of children as they are in the best position to decide what is best for their children. This is backed up by the 1996 Education Act which says that education authorities have a duty to educate children 'in accordance with the wishes of the parents' as well as the European Convention on Human Rights which states that 'the State should respect the right of parents to ensure education in conformity with their own religion'." [Individual respondent]

Communication with parents about the specific curriculum content is important.

Schools need to keep parents informed of the content to be delivered, providing reassurance and opportunity for parents to discuss topics at home. Parents could attend lessons to observe the content.

"Schools should consult parents as to how they want their children to be taught, for example about LGBT, and provide lessons sensitive to the child's faith and values." [Individual respondent]

Alternative lesson delivery ideas were suggested. The alternative can be provided by the school or by parents. However, schools can encounter difficulties in providing supervision for the learners who are withdrawn. Parents could provide a programme of study to suit their child, but monitoring of alternative delivery would be needed and accountability during the school day rests with schools. Some ideas for alternative lesson delivery were suggested, these included; a faith lesson delivered by the parents or appropriate faith community, free study periods; core subject lessons, PSHE; Welsh, Work experience, life skills, Ethics and Philosophy; revision, Humanities without the religious aspect, and counselling opportunities for children.

"Perhaps an alternative citizenship course for groups who might otherwise withdraw as an extension of PSE would ensure all pupils are 'ethical, informed citizens' regardless of their preference." [Education provider]

There could be unintended consequences if the right to withdraw is removed. Parents may remove their child from school during the delivery of sessions or the child may be removed long term, and the number of learners educated at home may increase. Certain faith groups may become disengaged with schools.

Learners need to be consulted. Respondents noted that learners need to decide what they want to study, and individual needs and requirements must be considered.

“If students are involved in the design and delivery of curriculum it ensures it is covering topics pertinent to their lives.” [Education stakeholder]

RE and RSE should be compulsory. Respondents re-emphasised the need for mandatory RE and RSE. This would ensure learners receive a broad curriculum and are prepared for society; in doing so one of the four purposes for the new curriculum (ethical and informed citizens) is addressed. RE is included in the Humanities AoLE and cross-curricular themes are applied with RE forming part of this delivery. The mandatory requirement could be for secondary schools only, it was also proposed that RE is not delivered during the upper years of secondary school.

Curriculum content must be age appropriate. Sex education should not be delivered in primary schools.

There is a need to develop clear guidance and training for schools. To ensure an unbiased approach clear guidance and training for the teaching of RE is needed, ensuring all faiths are given equal attention.

“If the right to withdraw is removed there is a need for professional learning opportunities to ensure that high quality, critical, objective and pluralistic RE is delivered.” [Education stakeholder]

Additional themes raised by respondents self-identifying as organisations.

There is a need for a more robust procedure for withdrawal. Schools need strong guidance regarding the right to withdraw and this needs to be communicated clearly to parents. Teachers may experience an additional burden when supporting the right to withdraw.

Welsh and English Language

Question 14

What are your views on the proposed approach for ensuring that the learning and teaching of Welsh is an integral component of the curriculum for Wales?

As with Question 8, this question did not provide respondents with the option of specifying in a closed question whether they agree or disagree with the proposed approach. However it has been possible to determine in most cases whether respondents agreed, disagreed or provided more neutral or nuanced views on the proposals in relation to the Welsh and English languages.

A total of 491 respondents commented on this question. Of these, 233 provided comments which indicated they agreed with the proposed approach; 122 provided comments which indicated they disagreed with the proposed approach; 82 presented neutral or mixed views. The remainder provided comments that were either unclear or not relevant to the question.

Among respondents who agreed with the proposed approach, the themes raised most frequently were as follows:

Ensuring Welsh is an integral component of the new curriculum supports and is consistent with wider strategies to strengthen the Welsh language. Key Welsh language stakeholder organisations raised this theme. Respondents noted that the proposed approach is central to supporting and strengthening the Welsh language. There was recognition that embedding the Welsh language as a core part of the curriculum is essential to support the Welsh Government's long-term vision set out in its strategy *Cymraeg 2050: a million Welsh speakers*.

Including Welsh as an integral component of the curriculum is important to preserve and support Welsh culture, identity and heritage. Respondents argued that Welsh culture and history are intrinsically linked to language and Welsh language learning should be promoted through the curriculum.

There was support among respondents – particularly among Welsh language stakeholder organisations - for the proposal that learners will follow a single curriculum for learning Welsh along a continuum. The Welsh second language programme of study, it was suggested, has not enabled the creation of a bilingual Wales, due to the poor quality of teaching and status of the subject. Removing the distinction between Welsh first and second language programmes of study was seen to present advantages in terms of curriculum planning, recording attainment and progression across all phases of learning. There was qualified support among respondents in some cases who underlined the need for differentiation and sensitivity to the different language learning abilities and contexts: it was noted that the single continuum should not be interpreted to mean a single level of assessment.

“Assessment and examinations [in Welsh] should reflect the prior learning and ability of the student in order to ensure fairness and equal opportunity to succeed.”
[Education stakeholder]

Others cautioned that the move to a continuum of language learning must not weaken standards in Welsh-medium education. Respondents who agreed with the proposed approach nonetheless pointed out a number of challenges specifically associated with language skills among the teaching workforce in English medium schools; and the need to provide support and resources to schools in the English-medium sector to encourage bilingual innovations and increased bilingual provision.

Schools and funded nursery settings should continue to apply Welsh language immersion as a teaching model. Stakeholder organisations were firmly of the view that the current immersion model used by Welsh-medium schools and funded nursery settings, including Cylchoedd Meithrin, is seen as a proven and effective model for enabling bilingualism. Respondents pointed out that it is recognised internationally. Immersion methods also enable learners in Welsh-medium schools to be assessed in both English and Welsh against the same level descriptions by the end of the primary phase.

Some stakeholder organisations felt that proposals could be strengthened by promoting Welsh language immersion at other stages (i.e. beyond the Foundation Phase) as a means of creating more bilingual learners in schools across Wales (including in bilingual and English-medium schools). Extending opportunities for learners to benefit from the immersion model could enable learners to make significant progress in developing their Welsh language skills and opt into Welsh-medium schools if they desired.

“The success of the immersion method is based on the fact that children are effective and capable learners. It is a method that benefits from the child’s desire to learn about the world and an intrinsic interest in play.” (Translation) [Early years stakeholder]

Responses collected from a campaigning organisation supported the proposal to continue Welsh as a compulsory subject in the curriculum. A campaign by one organisation collected the views of 145 people. The responses collected through this campaign were focused particularly on the Welsh language in the curriculum and agreed with the proposal to provide opportunities for teaching and learning Welsh for all. Responses received via this campaign supported a single continuum of language learning, with the need for a school categorisation system that supports this. The campaign, however, disagreed with the proposal to legislate to make English compulsory in the curriculum, noting that English is ‘bound to be taught’ in schools, without the need for specific legislation to make it compulsory.

A small number of responses were received from young people. Among those who supported the proposals, they felt that Welsh language skills can help connect young people to their culture and heritage and boost future employment prospects. The proposed approach could also ensure people view Welsh and English as equal, which may motivate more people to learn Welsh. Other young people disagreed with the proposals (see below).

A proportion of respondents were supportive in principle but expressed reservations about key aspects of the proposals, specifically:

Respondents expressed concern about the capacity of the teaching workforce to deliver the proposals. Referring to the proposal that English-medium schools will be required to focus more on Welsh language provision, respondents expressed concern that there are limited Welsh language skills among teachers in the English-medium sector.

“...given the concerns regarding Welsh language standards in many schools (particularly under the previous Welsh second language approach) and the current levels of Welsh language expertise and resource available across the wider system, much work will be required to deliver the proposal in practice.” [Education stakeholder]

It was suggested that there are shortages among the current workforce and that ITE institutions are experiencing difficulties in reaching targets for Welsh-medium trainee teachers. Both individual respondents and key stakeholder organisations highlighted the ‘unresolved challenges’ for the education system in Wales in terms of recruiting sufficient numbers to meet future demand and deliver the proposals set out.

The percentage of people able to work through the medium of Welsh varies greatly between phases and between consortia areas and it is important that sufficient time and financial resource is put into areas where it is needed most.

Respondents also referred to the need to ensure appropriate provision and support for teachers who move to Wales so that they are able to teach the curriculum effectively.

Some felt that delivering the proposals was impractical, noting the need for significant investment in retraining teachers who are not fluent in Welsh to equip them with the skills and confidence to teach it well.

“This is an excellent idea but the shortage of teachers confident and able to teach Welsh needs to be addressed as a matter of urgency otherwise this ambition will fail.”
[Education stakeholder]

In addition to developing Welsh language skills, there will be a need to develop wider language teaching pedagogies among the teaching workforce.

Although Welsh should be an integral part of the curriculum, provision should take account of different learners’ needs and the differing linguistic contexts. Respondents noted that provision, assessment and accountability arrangements should reflect the differences in language levels, linguistic context and individual learners’ needs. It was also noted by some respondents that children with additional learning needs should not be required to learn Welsh if this presents further difficulties to their learning.

“Consideration must be given during inspections to areas on the border or areas where little Welsh is spoken in the home. How can we compete with areas where Welsh is widely spoken?” [Education provider]

Geographical (and socio-linguistic) context was raised as a theme: respondents noted that the proposals should take into consideration that children in some parts of Wales are not exposed to the Welsh language as those living in areas where Welsh is spoken as a first language by a larger proportion of the population. This, it was suggested, would lead to some pupils feeling disadvantaged.

“I believe that forcing Welsh second language pupils to sit Welsh first language exams, will result in a profoundly unfair examination system. The unintended consequences will include demotivating Welsh second language pupils to make an effort (as they know they will not be able to compete with fluent Welsh speakers).” [Individual respondent]

Among those respondents who disagreed with the proposed approach or which expressed opposition to certain aspects of the proposals in relation to the Welsh language, the themes raised most frequently were as follows:

Parents should have a right to choose to study Welsh and learning Welsh should not be imposed on pupils. The most frequent argument put forward by individual respondents who disagree with the proposed approach is that Welsh should be optional, and parents should have a right to choose.

"I do not agree that Welsh should be compulsory if English is not. Choice is crucial. Children and parents should choose...and not have a language imposed, particularly when there are simply not enough Welsh language specialists in the system. Focus on literacy skills in a language that is utilised for business across the UK and the world." [Individual respondent]

Respondents noted that all learners already have the opportunity to learn Welsh and cautioned that imposing the Welsh language as an integral component of the curriculum will lead to resentment among learners and parents.

Many respondents expressed agreement that pupils should learn Welsh up until 14, but that from that age onwards they should be able to decide for themselves whether to continue studying Welsh.

"Parents should have a choice to send their children to Welsh or English-medium schools. The Welsh language should be an option for pupils in English-medium schools, probably from about 14 years' old." [Individual respondent]

Welsh should not be prioritised at the expense of other subjects or skills. Some respondents who disagreed with the proposed approach felt that other subjects should be prioritised, with English, maths, science and MFL cited repeatedly. It was felt that putting a greater focus on these subjects, instead of requiring schools to deliver additional Welsh language teaching, would do more to increase Wales' economic performance and raise the nation's profile in the UK and internationally.

The proposal could impact negatively on standards in education, particularly among more disadvantaged and less able learners. Requiring that the learning and teaching of Welsh is an integral component of the curriculum may divert attention and resources from efforts to closing the attainment gap.

"As the majority of disadvantaged pupils are not in Welsh-medium schools it is likely to make the gap in achievement even larger." [Individual respondent]

Others, including individuals and some organisational representatives, made the link between standards and the lack of workforce capacity to teach Welsh. Two issues linked to the workforce were raised: firstly, due to insufficient numbers of teachers in the English-medium sector that Welsh risks being taught to a low standard, thereby not providing the "best opportunities for learners to become fluent", as set out in the consultation document.

"there will be a generation of children taught by people who are learning on the job, a job where there's no time as it is." [Individual respondent]

Secondly, standards in education could be negatively affected as a result of schools prioritising the recruitment of teachers with Welsh language skills, rather than their other teaching skills or experience.

“If Welsh must be delivered in other subject areas in an English medium school will it mean that the best teachers are overlooked if they are unable to speak Welsh?” [Individual respondent]

Respondents expressed concern that some teachers will leave Wales to teach in England. It was argued that the pool of teachers in Wales is already small. Some respondents speculated that the proposed approach could encourage some to seek work over the border in England, exacerbating some of the challenges facing the teaching workforce in Wales.

Young people who disagreed with the proposed approach cited many of the same reasons. Some felt that making Welsh compulsory disadvantages young people who are not Welsh speakers or do not go to Welsh-medium schools.

“I think that it will be very difficult for young people who don’t go to a Welsh-medium school to get good grades under this system. How can they if they are marked against Welsh speakers? This will discriminate against non-Welsh speakers. If Welsh GCSE is compulsory it will mean that they can’t achieve their potential - e.g. there would be no way for them to get all As.” [Individual respondent]

Learner Assessment Arrangements

Question 15

What are your views on the legislative proposals to enable the new assessment arrangements?

There was a total of 325 comments in response to this question.

Among respondents who expressed neutral or positive views, the themes raised most frequently were as follows:

The proposals will support a more learner-centred approach to assessment. Key education stakeholders tended to raise this theme. A more personalised, learner-centred assessment is welcomed with greater emphasis on formative assessment for learning; diagnostic marking and focus on the development of individual learner progress. There was support for a progressive learning continuum with progression steps welcomed and seen to support personalised, learner-centred assessment.

“We welcome the development of an assessment and evaluation framework that keeps the learner at the centre of the system, and which is focused on development at all levels to improve teaching and learning.” [Religious organisation]

The proposals will support increased school assessment autonomy and practitioner flexibility. Key education stakeholders tended to raise this theme. The move towards flexibility and increased teacher autonomy in relation to assessment was seen as a positive improvement, where practitioner’s judgement will be a valued component in supporting target setting for pupil progress. Respondents welcomed a balance between statutory guidance and legislation, and more flexible guidelines to support practitioners.

Respondents expressed support for reducing the burden of accountability. Key education stakeholders tended to raise this theme. There was support expressed towards headteachers setting Achievement Outcomes against each of the Progression Steps and a move away from referring to externally-defined criteria as part of a high-stakes accountability framework. Respondents also noted the importance of providing a clear structural framework and specific guidance for headteachers in order to establish consistency and equity in assessment provision across schools.

“The decision to reduce the impact and unintended consequences of the current high stakes accountability framework is essential if the new curriculum and assessment arrangements are to be successfully implemented.” [Education stakeholder]

Attention will need to be given to support implementation of new proposals.

Respondents noted that professional development for practitioners including support, time and training will need to be provided to ensure teachers are clear on the new curriculum and assessment requirements and to implement and imbed the changes to ensure clarity and consistency of approach.

“Welsh Government needs to find a way for schools to be competent in delivering the new curriculum and also ensure there are appropriate levels of consistent guidance, support and

training nationally for schools. The key will be to achieve a suitable balance for the benefit of learners.” [Education stakeholder]

Additional themes raised by respondents self-identifying as organisations.

Respondents expressed support for legislative proposals to enable new assessment arrangements. Respondents expressed approval of the proposed curriculum structure (in particular the move towards formative assessment and personalised assessment), the proposed assessment structure and content is seen as relevant and suitable in relation to the new curriculum.

“We strongly agree with the legislative proposals and believe that that the primacy of formative assessment is the best approach.” [Education practitioner]

There is recognition of the need for collaboration with other agencies and practitioners. Communication and sharing of assessment information between a range of settings and stakeholders including school clusters will be necessary to support new assessment arrangements and transition particularly during the early years and secondary transition periods.

“There is a need to ensure that any non-statutory assessments carried out in the non-maintained sector or nursery school classes are valued by those undertaking the assessment on entry to reception. The successful transition of children between non-maintained settings and schools is paramount and partnership working, and mutual respect is key to this success.” [Education practitioner]

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

More clarity on the proposed assessment reform and associated legislation is needed. Key education stakeholders tended to raise this theme. Respondents noted they would like further information about the proposed assessment approach in order to express their views on the legislative proposals. There is a requirement for general clarity on the proposed assessment arrangements as well as specific clarity about Achievement Outcomes set by the school to make assessment principles transparent. There is also clarification required on the structure and content of personalised progressive steps along a continuum particularly in relation to e-portfolio’s and the assessment continuum from baseline to GCSE.

“I am not sure how Achievement Outcomes differ from Levels given to children at the end of each key stage. How will schools be assessed? E-portfolios will be available for schools to use but without statutory guidance schools will differ in their use of these as an assessment tool.” [Individual respondent]

Respondents expressed concern that the legislative proposals for new assessment arrangements could lead to a lack of consistency. Key education stakeholders tended to raise this theme. There were concerns that the legislation could lead to discrepancies in assessment judgements across Wales. There is need for a consistent assessment continuum and a parity of approach to assessment in order to maintain consistency with qualifications in other countries. Respondents expressed the need for practitioner guidance to support standardisation and moderation of learner portfolios. There

were concerns the proposals are too broad, open to interpretation and schools may be working to different levels of learner progression.

“This is an area that needs further consideration and set centrally so that there is consistency, nationally. There needs to be far more specific guidance on the use of the progressive steps and outcomes.” [Education stakeholder]

There is a need to establish clear accountability processes for assessment procedures including internal and external quality assurance. Comments referred to a need for clarity of accountability within new assessment proposals, in particular the use and interpretation of Achievement Outcomes and progression steps as a process of self-evaluation by individual schools and how these will be monitored for transition and national consistency. There were some concern that if headteachers are setting achievement outcomes this will mean less equity for pupils. There was also recognition of the need for external assessment and consideration of the role of other agencies such as WG and Estyn.

“Presumably, schools will still be required to assess and report on pupil outcomes for internal and external scrutiny until they match the new curriculum roll-out dates. This will entail more work at school level in order to subsume that which was previously undertaken by the WG.” [Other stakeholder]

Consideration of resources, in particular the impact of additional workload, will be necessary. It is imperative to ensure assessment changes are implemented without placing an additional burden on teachers' workload. Clear guidelines for new assessment procedures including Progression Steps must be provided to simplify the process, support consistency across schools and minimise paperwork. There is a need to enable time for new proposals to be implemented and in particular provide guidance on how e-portfolios will be prepared, implemented and monitored in terms of workload.

“Agree with them in principle, but need to be mindful that assessment arrangements are not overly burdensome to the point that it is actually a hindrance with regard to paperwork. Assessment needs to be vastly simplified.” [Individual respondent]

Additional themes raised by respondents self-identifying as organisations.

General opposition to assessment reform was raised on occasion by respondents. Assessment reform is seen as unnecessary and/or unnecessarily burdensome on the education sector. Current proposals are seen as similar to those in place and the current assessment procedures are considered sufficient.

“Schools already have assessments in place therefore if they are expected to develop new assessments based on the Achievement Outcomes described at each Progression Step in an already ever changing system then this task will become onerous and unnecessary.”
[Education practitioner]

There is a need for clarification of terminology used to explain new assessment procedures. Key education stakeholders tended to raise this theme. There were some requests to clarify some of the wording used in relation to Achievement Outcomes, Progression Steps, and terminology such as 'best fits'. In addition, there is a need to explain the extent to which headteachers are given discretion to specify the meaning of these terms within individual schools.

Evaluation Arrangements

Question 16

Do you agree with the proposed approach outlined for evaluating the effectiveness of curriculum and assessment arrangements?

Response	Percentage (number)	Number who provided additional comments
Yes	24.2% (191)	46
No	33.7% (266)	48
Don't know	42.2% (333)	50
<i>No response to closed question</i>		23
<i>Total</i>	790	167

Among respondents who answered 'yes', or expressed neutral or positive views, the themes raised most frequently were as follows:

The proposed assessment arrangements support a move towards schools' self-evaluation. Key education stakeholders tended to raise this theme. Respondents expressed support that the indicated model of a self-assessment framework currently being developed is a good idea and should allow for consistency of approach within schools. These responses noted that the move to a focus on validated self-evaluation will provide flexibility and freedom for schools and support school improvement through a focus on the four purposes.

"[w]e agree that all tiers will benefit from self-evaluation based on a broad range of qualitative and quantitative information and that peer engagement should create greater transparency in the future." [Education stakeholder]

The proposed assessment framework will support a learner-centred approach to assessment. Key education stakeholders tended to raise this theme. Respondents expressed support for a pupil-centred assessment approach with greater emphasis on the development of the child and use of formative assessment to support pupils through progression steps. A progressive learning continuum was welcomed and seen to support personalised, learner-centred assessment.

"I agree with the statements: these arrangements will form an Assessment and Evaluation Framework that keeps the learner at the centre of our system and focused on development at all levels to improve teaching and learning." [Religious organisation]

There is general support for the proposal that school self-evaluation will be quality assured through inspection by Estyn. Respondents agreed on the role of Estyn to report on the quality and standards from an independent perspective, to quality assure school-level improvement processes and support clarity of roles and responsibilities across partnerships within the middle tier.

"We support the continued strong role of Estyn to report on quality and standards, provide external accountability to schools and reflect on their implementation of the new curriculum (Ref: 3.151 and 3.152)." [Third Sector Organisation]

Additional themes raised by respondents self-identifying as organisations.

There is some awareness of the changing role of headteachers within the proposed assessment arrangements. A clear framework and guidelines need to be provided for headteachers to establish consistency of understanding of Achievement Outcomes and e-portfolios across schools and to avoid a 'tick box' approach to progression steps and evaluations.

“It is vitally important that headteachers in schools should be responsible for their school’s self – evaluation in order to work towards a self-improving system.” [Education practitioner]

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

More detail on the proposed approach for evaluating the effectiveness of curriculum and assessment arrangements is needed. Key education stakeholders tended to raise this theme. Respondents noted an inability to state whether or not they agree with the assessment approach as further detail is required such as how progression steps will be implemented in schools, the introduction of e-portfolios and accountability and impact of new assessment arrangements.

“Progression points, appropriate tracking, transition of very large cohorts is still unclear and too much of a risk for it all to be left to school guidance. Still lack of clarity of how the curriculum will blend with assessment arrangements.” [Education provider]

There was some general opposition to assessment and curriculum reform and associated legislation. These responses noted their general opposition to curriculum reform as a whole. In particular, noting that reform is unnecessary and that there is an over-emphasis on assessment in education. There were concerns that the legislation will not necessarily be beneficial for children and assessment changes will lead to a lack of parity with qualifications in other countries.

“Be careful not to put children in Wales at a disadvantage by creating a new system not recognised by the rest of the country.” [Individual respondent]

There is a need for clarification of evaluation and accountability process involving support networks. Key education stakeholders tended to raise this theme. There is a need to establish effective structures to monitor implementation of the new curriculum and assessment arrangements. This includes clarifying the role of – and engagement among – different education tiers (Welsh Government, Estyn, regional education consortia, local authorities) as part of a long-term evaluation process. There is a need to provide a timescale to clarify the school self-evaluation process.

“It is important that self-evaluation forms the basis of the new arrangements and that these arrangements are agreed through a system of subsidiarity. The new national self-evaluation and improvement framework which is being developed by Estyn, OECD and the profession is a good example of this.” [Education stakeholder]

There is need for careful consideration of resources, in particular the impact on time and workload. There is a need to ensure assessment changes are implemented without

placing an additional burden on teachers' workload. There is also a need to provide clear guidelines for new assessment procedures including progression steps to simplify the process, support consistency across schools and minimise paperwork. In addition, it is necessary to enable time for new proposals to be implemented and in particular provide guidance on how e-portfolios will be prepared and monitored in terms of workload.

“Once again, it will be essential for time and resources to be included within the professional learning offer not simply for schools but also for Governors and members of organisations that are currently referred to as the Middle Tier.” [Religious organisation]

It is necessary to develop clear and effective processes to plan and implement curriculum and assessment changes. There were responses expressing concern at the amount of consultation and implementation time for the consideration of new assessment arrangements.

Additional themes raised by respondents self-identifying as organisations.

Respondents expressed the need for inclusion of Early Years input and provision in the assessment proposals as part of the learning continuum of child development. There were requests for clarity of the role of non-maintained settings in relation to feedback on curriculum and assessment proposals and future evaluations.

Question 17

What are your views on the proposed approach to the publication of learner assessment data and any risks you foresee?

There was a total of 264 comments in relation to this question.

Among respondents who expressed neutral or positive views, the themes raised most frequently were as follows:

Publication of learner assessment data is welcomed as a tool for external evaluation of school effectiveness. Respondents noted general support for the proposed approach to the publication of standardised learner assessment data particularly at Key Stage 4. This publication enables schools to consider their performance in the context of other similar schools in the authority and consortia and also provides information for parents at a national level.

“Publication of assessment data below national level i.e. at consortia, local authority and individual school level must be available for public consumption in the same way as GCSE data is available.” [Education practitioner]

Support for learner-centred approach to assessment instead of a high stakes accountability assessment framework. Key education stakeholders tended to raise this theme. Respondents noted belief that the proposals for publication of learner data strike a balance between transparency and use to improve outcomes for learners through using a learner-centred approach and progression steps. This has positive implications for the improvement of teaching and learning as assessment can support the implementation of the curriculum rather than being used as an accountability tool.

“The new proposed approach to the publication of learner assessment data is the correct one, particularly when considering some of the unhelpful school-level behaviours caused by high-stakes accountability of the past.” [Education stakeholder]

Ensure parents remain informed of pupil progress through use of published data.

There was recognition of the need to inform and consult parents on proposed changes, respecting parental input into assessment proposals and recognition of the need to continue to make standardised data information available to parents and carers.

“The quality and transparency of progress reports to parents is key here and we welcome the commitment made by the Government regarding future advice and guidance provided to schools in this area.” [Religious organisation]

Additional themes raised by respondents self-identifying as organisations.

Schools welcome the involvement of support networks to implement the new proposals.

Respondents welcomed a continuation of the positive support generated by the ‘family of schools core data sets’ and cluster collaboration with external quality assurance for the implementation of new assessment procedures.

“Going forward, regional consortia / school improvement services need to be given the remit to assist schools in maintaining the positive collaborative approaches established under the old system and incorporating them into the new approaches in order to further enhance the self-evaluation / school improvement system required.” [Education stakeholder]

Among respondents who expressed particular concerns, the themes raised most frequently were as follows:

Respondents expressed concern at the publication of learner assessment information. Key education stakeholders tended to raise this theme. In particular, that it will lead to data being used as part of a high-stakes accountability framework and as a judgement tool for school comparison. This was seen as an outdated summative approach which is not in line with the ethos of the new curriculum.

“I do not think that learner assessment data should be published. Successful futures rightly raised the issue of summative data being used for the wrong reasons. I agree that teacher assessment data should be used primarily to “support progress at an individual pupil level rather than being misused for accountability purposes. “Publishing learner data at an individual level would not be acceptable and publishing summative data would introduce and accountability that is not intended.” [Education provider]

Caution required when sharing data due to complexities with interpretation and reliability. Key education stakeholders tended to raise this theme.

Respondents expressed the need for caution when publishing pupil performance data due to the challenges in drawing objective conclusions and the blurred lines between accuracy of learner assessments and accountability. There is a need to establish and adhere to clear accountability processes, as well as effective external structures to monitor pupil assessment and to support interpretation of data.

“As an ex-teacher I know full well that “data” can be negligent, misleading, or incomplete. To “publish” one vouches for its objective value. If it can’t fulfil such criteria, it should not be published.” [Individual respondent]

There is a need to ensure security and awareness of data protection when using online data systems. IT systems must support GDPR regulations and the publication of pupils' personal information. There were concern expressed about the security of storing e-Portfolios remotely and the considerations of reliable access for schools to online systems.

“Digital portfolios leading to assessment data will have to be stored securely and are subject to the same vulnerabilities as any other organisation which has a presence online.”
[Education stakeholder]

More detail on the proposed approach to the publication of learner assessment data is needed. Key education stakeholders tended to raise this theme. Respondents noted an inability to state whether or not they agree with the approach to publish learner assessment data without further information about the suggested content and delivery of the new assessment processes.

“There is not sufficient supporting argument or information to answer this question with any degree of confidence.” [Education provider]

Question the requirement for the publication of learner assessment data. Responses questioned the purpose of the publication of learner data and how it will inform different education tiers (regional education consortia, local authorities, Welsh Government). There were some suggestions that current data entered onto school recording systems (starting with pupil entry to school) is sufficient.

“We need to ask why learner assessment data is being published and be clear about its purpose. How will it inform support required, at learner, teacher, school, cluster, consortia and national level?” [Education provider]

There were concerns that the publication of learner assessment data could portray inconsistencies of approach. Key education stakeholders tended to raise this theme. Respondents express a requirement that arrangements for data publication are transparent and consistent across Wales. There were concerns that publication might lead to inconsistency across the education system, such as through school to school variation or interpretation of progression steps (recognising a need for national sampling of key priorities). There were also concerns that assessment changes will lead to a lack of parity with qualifications in other countries.

“Unless guidance is made available by Welsh Government, there may be significant variation in the manner in which assessment data is presented causing confusion for parents and wide variation across the system.” [Religious organisation]

Additional themes raised by respondents self-identifying as organisations.

Respondents question whether publication of learner assessment data is in line with the vision of the new curriculum. These responses questions on the necessity of pupil assessment data publication following findings in Successful Futures that assessment should support progress at an individual pupil level. There was recognition of the need for assessment to relate to individual progression steps rather than being carried out for accountability purposes.

“Appears contrary to other proposals within Successful Futures and ensuring that pupils continue as lifelong learners and make progress.” [Education provider]

Impact Assessments

Question 18

Do you agree with our approach for the RIA? Is there anything else you think we should take account of?

Response	Percentage (number)	Number who provided additional comments
Yes	12.7% (93)	27
No	34.7% (254)	30
Don't know	52.7% (386)	44
<i>No response to closed question</i>		14
<i>Total</i>	733	115

Among respondents who answered 'yes', 'no', or 'don't know', there were particular themes which arose frequently across all responses:

Careful consideration is needed of the financial implications of undertaking such large-scale reform, including the value added of such reform. Key education stakeholders tended to raise this theme. The RIA does not sufficient take into account the significant resources (financial, producing resources, staff capacity and training) needed to design and implement the new curriculum and assessment arrangements. This issue is particularly important to consider given the already limited budgets within which schools operate.

“Due to the significant loss of funding for schools over the last few years, there are now fewer staff working longer hours in schools, and less money available to schools to implement the proposals. Although there is additional funding identified as a part of this process, we are concerned that it does not represent sufficient investment to ensure that schools are able to implement the new curriculum successfully. This represents a genuine risk that needs to be addressed.” [Education stakeholder]

Careful consideration is needed of the impact on the workload of education professionals, and their associated well-being. Key education stakeholders tended to raise this theme. Alongside the impact on resources in the education sector, the impact of the new arrangements on the workload and well-being of education professionals has not been sufficiently considered. The process of designing and delivering new curriculum and assessment arrangements will place a significant burden on teachers.

“RIA for school-level policy needs to take into account the impact upon financial resources (school budgets), staff mental health and wellbeing (as well as pupils), current workload implications and the timetable for implementation within the context of the scale of current reform.” [Education stakeholder]

Additional consideration of the impact on particular groups or sectors is needed. Particular groups and sectors have not been given sufficient consideration within the RIA approach. These groups include children from families on low incomes; further and higher education institutions; the non-maintained and early years sector; children cared for by

foster parents or grandparents; young people with protected characteristics and their carers; children from non-Welsh speaking families; and diocesan authorities.

Additional consideration of impact of particular education themes or curriculum areas is needed. More consideration of the impact of the reform on digital security, on core provision and on the provision of modern foreign languages is needed.

There are expressions of support for the proposed approach. Key education stakeholders tended to raise this theme. These expressions of support either noted general support (without further explanation) or noted that the process of designing the approach seems comprehensive and/or will sufficient assess the impact of the reform on schools and learners.

“It considers the positions of many external agencies which encompass the breadth of our communities.” [Translation] [Individual respondent]

Further consideration should be given to the practical implications of the reforms. Respondents expressed concern over the tight timescales for implementing curriculum reform and the way in which key principles of the new curriculum will be implemented in practice.

Additional themes raised by respondents self-identifying as organisations.

As the RIA approach develops, better use could be made of existing evidence to inform a more in-depth impact assessment. There is a need to undertake a more comprehensive impact assessment, using a good range of evidence and independent expertise, to assess the impact on particular sectors and groups.

“As the RIA develops, analysis should make robust use of the available evidence (including the results of consultation) to provide a more detailed understanding of the benefits and risks for each of the options. This will help to assess the potential positive/negative impacts and help Welsh Government further justify its preferred options. For example, the RIA could have identified some risks associated to the proposal to make Relationships and Sexuality Education a statutory part of the curriculum.” [Education stakeholder]

Organisations provide extensive detail on the particular groups or sectors which have not been considered fully in the RIA approach. This includes the way in which the Four Purposes and other curriculum changes (such as RE and RSE reforms) will have an impact on children’s rights and the particular impact on children from low-income backgrounds and on gender disparities.

“The Children’s Rights Impact Assessment is a missed opportunity and suggests that the relationship between the proposals and the rights of children and young people is not fully understood by Government.” [Other Stakeholder]

Among respondents who answered ‘no’, or ‘don’t know’, there were particular themes which arose frequently in responses:

There is a need for further detail on the proposed approach. Respondents reported feeling unable to express an opinion without further detail on the proposed approach for the RIA and/or further detail on the reform process itself.

There were also comments noting an inability to express an opinion on this subject or re-iterating points made earlier in their submissions regarding the right to withdraw learners from RSE.

There were criticisms of the question and the terminology used. There were responses noting that they do not understand the question, often due to the use of an unfamiliar acronym (RIA).

Some Respondents provided negative comments not directly associated with the question. This included a general opposition to curriculum reform (and noting the reform will not address the most significant weaknesses in the education system) and commenting that the right to withdraw learners from elements of the curriculum should be retained.

Question 19

Do you agree with our approach for the Impact Assessments? We would particularly value your view on the proposed impacts on groups with protected characteristics.

Response	Percentage (number)	Number who provided additional comments
Yes	20.3% (143)	33
No	29.5% (208)	28
Don't know	50.3% (355)	32
<i>No response to closed question</i>		18
<i>Total</i>	706	111

Among respondents who answered 'yes', or expressed positive views or further commentary, the themes raised most frequently were as follows:

There were broadly positive responses that impact assessments are comprehensive and should sufficiently support equality and diversity. Key education stakeholders tended to raise this theme. Responses commented that the approach has considered a wide range of themes and groups which may be affected by the reform and has done so in a fairly comprehensive manner. They noted that the approach should provide a good foundation on which to assess the overall impact of the new curriculum and assessment approach.

“There are a number of significant developments in relation to the White Paper which can be advantageous in terms of "normalisation" and providing a vision of a pluralistic, progressive and diverse Wales (which would be clearly positive in terms of impact on individuals or groups and characteristics protected).” (Translation) [Early Years Stakeholder]

On occasion, respondents noted that the impact assessments could be strengthened by addressing particular gaps in their coverage. Key education stakeholders tended to raise this theme. While these respondents broadly agreed with the approach taken, attention is also drawn to gaps that should be addressed in order to strengthen the approach. These included an increased focus on the social environments of groups with protected characteristics, the impact of Welsh language proposals (and the impact of

proposals on the Welsh language) and the provision of further detailed evidence to support the approach.

Additional themes raised by respondents self-identifying as organisations

Organisations discussed in detail the need to consider the way in which the reforms impact upon and support children’s rights. Key education stakeholders tended to raise this theme. They noted that the impact assessment should give careful consideration to the way in which the curriculum and assessment reforms contribute to the articles of the United Nations Convention on the Rights of the Child (UNCRC). This includes assessing the extent to which the Four Purposes realise the provisions of the UNCRC. They therefore noted that the Children’s Rights Impact Assessment must be strengthened.

“In terms on assessing impact, it is clear the policy change will positively contribute to the United Nations Convention on the Rights of the Child (UNCRC), in particular to Articles 28 and 29. However, stronger analysis of each of the proposals and the different policy options would have helped Welsh Government to articulate more strongly how curriculum reform gives further effect to children’s rights in Wales than as currently described.” [Education stakeholder]

Organisations discussed in detail the need to give increased consideration to the impact on the groups they represent. For example, the need to give sufficient consideration of the impact on the early years and non-maintained sectors, religious bodies and black and minority ethnic learners, as well as the involvement of their respective sectors in the impact assessment (such as third sector organisations).

Organisations were broadly positive about the way in which the approach support wider policies within Wales. This included expressing support for the way in which the impact assessment reflects the Well-being of Future Generations (Wales) Act.

Among respondents who answered ‘no’, or expressed particular concerns, the themes raised most frequently were as follows:

Respondents drew attention to particular gaps in the coverage of the impact assessment. These responses reported that particular groups or sectors had not been sufficiently considered in the approach to the impact assessment. Respondents noted that stronger consideration must be given to: Learners from disadvantaged backgrounds; LGBT groups; families of faith; learners with additional learning needs; learners with English as an additional language; black and minority ethnic learners; non-Welsh language speakers; religious groups and bodies; disabled groups; and all protected characteristic groups.

“There’s a clear need to do an impact assessment on children from disadvantaged backgrounds – this group has traditionally not been best served by the arrangements we are set to replace, and this replacement is partly inspired by a determination to do better by our disadvantaged learners.” [Individual]

Respondents criticised the clarity of the question or noted their lack of understanding. Respondents noted that they didn’t understand the question or didn’t have sufficient knowledge to respond (including because they have not been able to read through or understand the associated section of the consultation document).

On occasion, respondents criticised certain principles on which equalities impact assessments are based. These responses queried the appropriateness of impact assessment which focus only on particular minority groups and queried the general need to undertake any curriculum reform and associated impact assessment.

Additional questions

Question 20

We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on:

- i) Opportunities for people to use Welsh
- ii) Treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 21

Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) Positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) No adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

There was a total of 274 comments in relation to question 20 and 179 in relation to question 21.

It is worth noting that many responses (particularly those in response to question 20) did not refer to effects on the Welsh language. They provided views on Welsh-medium education more generally and on the principle of 'treating the Welsh language no less favourably than the English language'. It should also be noted that many of these themes echo issues raised in response to question 14 (Welsh and English Language).

Among respondents who were supportive of the proposals, the themes raised most frequently were as follows:

The proposals will extend opportunities for people to use the Welsh language. By ensuring Welsh is a compulsory element of the new curriculum for Wales for all learners of compulsory schools aged 3-16 years, the proposals will increase exposure to the language and, if taught effectively, increase standards and skills. It was also suggested that the proposals will lead to new, 'creative' approaches to using Welsh as a medium of instruction in English-medium settings.

“Gives renewed focus on learning Welsh primarily as a means of communication, particularly oral communication and understanding.” [Third Sector Organisation]

The proposals could foster more positive attitudes to the Welsh language. If implemented successfully, respondents suggested the proposals could help normalise the use of Welsh across the education system. It was recognised that, in order to support the wider use of the language more generally, the new curriculum arrangements should be supported by wider strategies to encourage and incentivise young people to continue to use the language beyond compulsory schooling.

The proposals will help support greater equality between the English and Welsh languages. The proposal will help promote the status of Welsh across all communities in Wales (however it should be recognised that not all respondents were supportive of the proposal, see below).

Respondents who were supportive of the proposals overall voiced concern regarding the ‘duty on all schools and funded nursery settings to teach English as a compulsory element of the new curriculum’. Respondents noted that the proposal set out originally in the consultation document would undermine the immersion model for teaching the Welsh language in many Welsh-medium settings.

Among respondents who expressed opposition or concern about the effects of the proposals, the themes raised most frequently were as follows:

Parents should have a right to choose to study Welsh and learning Welsh should not be imposed on pupils. Respondents noted that learners and parents should be able to choose whether to receive their learning in Welsh. Parents who do not speak Welsh will have difficulty supporting their children, it was suggested. Welsh, like MFL, should be an opt-in subject. Imposing the language will lead to resentment and could have a negative effect on attitudes towards the language.

“Ensure that the curriculum is not disproportionate, that it allows us to be inspired, follow the interests of learners and develop citizens of the world as well as Wales. The compulsory aspect seems to be at odds with this underpinning principle.” [Education provider]

Respondents noted that imposing Welsh language learning will lead to resentment, resulting in negative effects on the public’s perception and use of the language. A proportion of those who responded to this question were of the view that the proposals would not have the desired effect, but rather would discourage the use of the language.

Some responses referred to how negative effects could be mitigated: this included actions to promote language learning in fun and engaging ways in order to win the ‘hearts and minds’ of learners and parents. This could include using language specialists to visit English-medium schools or clusters to help pupils “engage with the language” in a way that leads to an appreciation of its importance and relevance.

The Welsh language is already treated favourably, and the proposals could have the effect of disadvantaging English speakers. Respondents stated that the Welsh language is already compulsory for learners in primary and secondary education. It is also promoted through public services and in business. Consequently, some felt that it is given sufficient preferential treatment and that sufficient resources are allocated to support the language. Linked to the point above, some responses indicated a perception that the new curriculum discriminates against the rights of children to learn in a language of their choice. Some respondents felt that the proposals were divisive as it could make non Welsh speaking people feel disadvantaged.

There was concern that there are insufficient teachers able to teach Welsh. It was suggested that there are insufficient specialist teachers with Welsh language skills to be able to increase the amount of Welsh language learning in the English-medium sector. In order for the plans to be delivered there will be a need to ensure a large-scale programme of professional development is available for teachers who have received education through the medium of English. Others noted the need to ensure that any training to develop practitioners' Welsh language skills is offered to supply teachers.

“More information needed on how teacher training programmes and upskilling existing staff to prepare for this change, not just in relation to increased use of the Welsh language but overall. Also impacts on senior leaders and Headteachers who will now need to manage new and probably ongoing complications in staffing.” [Individual respondent]

Echoing comments in response to Question 14, respondents noted that the teaching profession, which is already facing challenges in terms of recruitment and retention, will be further impacted.

“The profession is in crisis in terms of recruitment: this will have a negative effect in attracting non Welsh speaking staff.” [Individual respondent]

Moving to a single continuum of language learning could discourage learners in English-medium schools. Removing Welsh second language study and qualifications, it was suggested, could impact negatively on progress in learning and teaching of Welsh due to learners in the English-medium sector feeling that they are less competent than their counterparts in Welsh-medium schools.

“A positive attitude and a sense of success is crucial for learner engagement. If English medium students' progress and attainment in Welsh is below their progress and attainment in other subjects, they will not engage with the learning and will not continue to learn beyond the end of compulsory education.” [Education provider]

Teaching Welsh should not be a priority as part of the new curriculum arrangements. Respondents suggested that other subjects should be given a higher priority.

The proposals will have a negative effect on standards in education. Respondents voiced concerns that promoting Welsh-medium education in some courses (English language and literature, science, vocational subjects) could have a negative effect on

standards in these areas, by reducing the amount of time learners can dedicate to these subjects.

Respondents questioned how effective the proposals would be in helping learners move towards fluency and increase the use of the language. It was suggested that the proposed curriculum arrangement may lead to a marginal increase in opportunities to use the language (based on knowledge of specialist, subject-related vocabulary), but that this may not produce fluent Welsh-speakers in keeping with the Welsh Government's vision. Some respondents felt that the proposals should go further in order to help achieve the target of a million Welsh speakers by 2050.

“If we are serious about increasing the number of Welsh speakers then we have to move towards establishing Welsh-medium schools as the only provision for state education although this will have to be a gradual process.” [Individual respondent]

Question 22

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

There was a total of 202 comments in relation to this question.

Certain key themes raised within questions 1-21 of the consultation were re-emphasised in further detail.

Respondents re-iterated their disagreement with the proposal to make age and developmentally appropriate RSE compulsory for 3-16 years. It is not developmentally appropriate for primary-school aged children to be introduced to the subject of relationships and sexuality.

Respondents also re-iterated their disagreement with RE proposals. This included responses stating that their religious beliefs had not been taken into account and that there should be a clear focus on Christianity within RE.

There were also responses expressing their support for the key principles around with the new curriculum and assessment arrangements are based. These respondents were generally supportive of a learner-centred approach to teaching and learning, allowing teachers more freedom to teach creatively in a cross-curricular way.

"I have seen how the curriculum has become less balanced, more narrow and students are under greater stress than ever before. To move the emphasis away from performance indicators that classify schools to putting each child and every teacher at the heart of the learning process can only be a good thing." [Education stakeholder]

Concerns were raised about the impact of Welsh language proposals on teaching and learning. Respondents raised concerns about the impact of Welsh language proposals on educational attainment and on the impracticability of implementing such changes within the current education system.

"There is hardly anything in this White Paper to suggest how English-medium schools are supposed to increase the standard of Welsh, apart from regional consortia supporting an improved "ethos and culture" towards the language. The only advice for English-medium schools is that they will "focus more" on their provision of the language. This is vague, to say the least. What is classed as more focus?" [Individual]

Concerns were also raised about the difficulty or impossibility of achieving curriculum and assessment reform under existing resource constraints and high teacher workloads. Respondents noted that there are insufficient financial and workforce resources to implement the significant changes required, without placing an increased burden on teachers.

There were criticisms of the quality of Welsh education in general, noting that the reforms proposed will not be effective in addressing wider systemic issues. Respondents expressed concern that standards and educational attainment are in decline and the reforms will not address core education challenges in Wales.

Respondents raised concern over how the new curriculum and assessment arrangements would be implemented in practice. Key education stakeholders tended to raise this theme. This included how assessment and qualification structures would change and how parity could be ensured with other UK countries.

There were also comments relating to the type of curriculum structure and content which would be most appropriate. This included expressing concern about a potential loss of core skills within the new curriculum, as well as querying how the AOLE structure will maintain subject expertise.

Respondents also criticised the way in which the consultation had been designed and communicated. These responses reported a lack of awareness of the consultation among stakeholders and members of the public, that some elements were difficult to understand and that the question wording suggests that Welsh Government has already made decisions on certain issues.

Certain new themes were also raised in response to this question, as well as certain themes which were elaborated upon in more detail than had been provided in earlier consultation questions. Respondents self-identifying as organisations provided much of the commentary around these themes.

There is a need to give more detailed, careful consideration to the way in which learners with ALN will be supported through the new curriculum and assessment arrangements. Key issues for consideration included: The accessibility of the new curriculum; the awareness and understanding of educational practitioners relating to learners with ALN; specific consideration of ALN within inspection and quality assurance frameworks; the way in which changes to data collection and reporting would impact on ALN monitoring; opportunities to include British Sign Language within the new curriculum.

“Learners with ALN can face particular barriers in accessing the curriculum. Given that the emphasis within the reforms is on teachers and practitioners having the freedom to create and adapt the curriculum, it is imperative that awareness is raised of such access requirements. To this end, we strongly recommend that the Welsh Government develop ALN guidance to sit alongside each AoLE within the new Curriculum.” [Third Sector Organisation]

There should be a clear emphasis on wellbeing, mental health and first aid within the new curriculum. Within the new curriculum and assessment arrangements, mental health must be included as a statutory element of the new curriculum or as an additional cross-curricular responsibility. There were concerns that the current approach and legislation does not guarantee protection for mental health provision and learning. The focus should be on engaging networks with expertise in mental health in curriculum development, as well as learners, and ensuring new curriculum and assessment arrangements align with mental health policies and approaches. Education practitioners should be provided with professional development to ensure they are capable of teaching emotional and mental health within the new curriculum structure. First aid (in particular CPR) should also be included within the new curriculum structure.

“We need to place mental health and wellbeing as a statutory part of the new curriculum for all learners and list it within primary legislation to provide further weight and status to this agenda. Again, in doing so, we are not asking teachers to take on any additional role. Instead, we are legitimising the issue and enabling and empowering the education sector in

Wales to continually think about the mental health and wellbeing needs of learners. This will inevitably lead to improved learner outcomes across the board as pupils will feel more confident and able to concentrate knowing they can seek help if they have any concerns.”
[Third Sector Organisation]

“We would like to highlight the training gap in emotional and mental health for teachers in Wales. This is another growing concern which could be addressed during the phased roll-out of the new curriculum. We believe existing teaching staff across all schools in Wales should be provided with basic emotional and mental health awareness to increase confidence in teaching the subject.” [Third Sector Organisation]

Modern Foreign Languages are an important element of a rounded, outward-looking curriculum and should be protected in legislation. Key education stakeholders tended to raise this theme. Respondents provided detailed arguments for why MFL should be included in legislation as a statutory element of the curriculum, rather than left to the discretion of teachers. Concerns were raised about the lack of protection afforded to MFL compared to the Welsh and English languages and responses noted disappointment that the legislative proposals do not reflect Welsh Government’s ambitions as set out in *Global Futures*.³

“The weakening of the statutory position for teaching of languages other than English and Welsh is disappointing, and risks placing learners in Wales at a disadvantage in an increasingly diverse, multicultural society and increasingly global labour market. Skills in international languages can be key to helping create individuals who are ‘ready to play a full part in life and work’, are ‘knowledgeable about their culture, community society and the world, now and in the past’, and ‘respect the needs and rights of others, as a member of a diverse society’, all stated purposes of the new curriculum.” [Education stakeholder]

The new curriculum should include environmental and sustainable development education. The new curriculum structure does not provide education relating to climate change, biodiversity, sustainable development or outdoor learning. This type of education is seen as central to developing informed citizens equipped with knowledge and skills to deal with major challenges facing the world. Environmental awareness and stewardship need to be an integral part of the curriculum.

“We need to reorient education and help people develop knowledge, skills, values and behaviours needed for sustainable development. We need students to be encouraged to be responsible actors who resolve challenges such as climate change, respect cultural and biological diversity and contribute to creating a more sustainable world.” [Third Sector Organisation]

Education stakeholders and partners should be effectively engaged in curriculum design and delivery going forward. Key education stakeholders tended to raise this theme. A wide array of educational partners should be involved in the design and delivery of the curriculum (including youth workers, third sector organisations and businesses) who play an important role in delivering learning outside the classroom environment. Such education partners have expertise in particular learning areas (such as environmental education, mental health, first aid or careers education) which can supplement teachers’ knowledge and provide additional expert capacity.

³ Welsh Government (2015), *Global futures A plan to improve and promote modern foreign languages in Wales 2015–2020*.

Professional development of Education practitioners is again emphasised, with particular reference to effective Initial Teacher Education and Welsh language training (ITE). Key education stakeholders tended to raise this theme. Education professionals will need a coordinated and substantial programme of professional learning to support them to develop and deliver new curriculum and assessment arrangements. In particular, this includes ensuring ITE provision prepares new teachers appropriately, covering key subject areas which arise within the new curriculum.

Further consideration must be given to how the new curriculum and assessment arrangements apply across all educational settings. This includes consideration of how the arrangements apply to early years, non-maintained and FE settings. There are concerns that the new arrangements currently focus primarily on primary and secondary school settings, without sufficient consideration of the key role which early years providers and FE settings have to play in the design and delivery of new curriculum and assessment arrangements.

The new curriculum should emphasise financial literacy. Financial literacy is noted on occasion to be a central skill necessary for learners to become informed, capable adults.

“We do feel financial capability of children and young people needs to be included in the curriculum. This would clearly fit under the AoLE of Health and Wellbeing, and the Purpose of Healthy, confident individuals, ready to lead fulfilling lives as valued members of society.”
[Education practitioner]