



Arolygiaeth Ei Fawrhydi dros Addysg a Hyfforddiant yng Nghymru His Majesty's Inspectorate for Education and Training in Wales

Ymateb i Ymgynghoriad / 0	Consultation Response
---------------------------	------------------------------

Enw / Name:	Owen Evans
Rôl / Role:	His Majesty's Chief Inspector of Education and Training in Wales
E-bost / Email:	ChiefInspector@estyn.gov.uk
Rhif Ffôn / Tel No:	029 2044 6446
Dyddiad / Date:	20.12.2024

Background information about Estyn

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

Our principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000¹ and the Education Act 2005. In exercising its functions, we must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by those receiving education and training in Wales;
- Quality of leadership and management of those education and training providers, including whether the financial resources made available to those providing education and training are managed efficiently and used in a way which provides value for money;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

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

We may give advice to the Welsh Parliament on any matter connected to education and training in Wales. To achieve excellence for learners, we have set three strategic objectives:

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

¹ This act to be replaced by the Tertiary Education and Research (Wales) Act 2022 when the quality provisions are commenced.

• Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

In the main, Estyn believes that many of the proposed amendments are helpful and will provide improved clarity to the overall guidance. In a few cases, we believe that the guidance could be made clearer, or could be more helpful, with a few changes. In nearly all of these cases, we have provided suggestions as to how these definitions could be adjusted.

We would particularly draw you attention to this important part of the guidance for clarification.

Section 3.4. Cross-cutting themes for designing your curriculum (page 5)

The text under the heading 'Relationships and sexuality education (RSE): statutory guidance' notes a change to:

 Relationships and sexuality education (RSE) is a statutory requirement in the Curriculum for Wales framework and is mandatory for all learners from ages 6 to 16.

Statutory guidance refers to ages 3 to 16. Please could Welsh Government check this section is correct.

Estyn staff would be happy to meet to discuss the detail of this response.

Consultation questions

Question 1 – To what extent do you agree that these proposed amends to the Curriculum for Wales framework guidance are useful?

Strongly	Somewhat	√	Neither	Somewhat	Strongly	
agree	agree		agree nor	disagree	disagree	
			disagree			

Please note here what additional information or support to the framework guidance would be helpful.

To ensure the updates to guidance are clear, we have identified the following areas which would benefit from a few amendments.

1. Introduction to Curriculum for Wales guidance (page 2)

There is a proposed change to 'Progression and assessment at the heart of curriculum design' by adding:

• For reading and numeracy, the personalised assessments are designed to <u>facilitate insight</u> into individual learners' progress and areas for development between Years 2 to 9.

This would be clearer if it read:

• For reading and numeracy, the personalised assessments are designed to <u>support</u> <u>schools to understand</u> individual learners' progress and areas for development between Years 2 to 9.

3.3 Principles for designing your curriculum (page 4)

The proposed change to the mandatory requirement from 'a school's curriculum must cover all of the statements of what matters from age 3 to 16' to 'a school's curriculum must secure learning in all of the statements of what matters from age 3 to 14' states:

 From 14 years, they only need to cover some of the statements of what matters in all of the Areas.

This is a significant change to the current guidance, and it is important to ensure that all pupils up until the age of 16 experience a broad and balanced curriculum. Schools would therefore benefit from further detail and explanation. We suggest:

From 14 years pupils will select a narrower range of subjects to study in depth. Schools
must still ensure that they provide a broad and balanced curriculum up to age 16, that will
include purposeful opportunities to engage with some of the what matters statements in
AOLEs that they have not opted to study in depth.

We also believe that this section is another opportunity to reiterate the requirement for all learners must continue to study all Areas of Learning and Experience until the end of year 9.

3.6 Enabling learning (page 12)

Under the section 'Exploration' the updated definition removes reference to the fact that exploration should take place 'both indoors and outdoors'. We recommend keeping this important point to support practitioners' understanding. It could be added to the sentence that begins:

 'Learners should have the opportunity to explore and investigate, both indoors and outdoors...

3.7 Implementation and practical considerations (page 13)

In the section 'Sharing best practice', where guidance notes that 'Schools and practitioners should collaborate to develop an understanding of what underpins successful approaches and practices', we suggest adding links to guidance that support school-to-school working and links that identify examples effective practice. This could include helpful resources on Estyn's website, such as thematic reviews.

3.8. Education other than as school (EOTAS) (page 14)

We would discourage the removal of the section in the current guidance which identifies that:

 Working with partner services and agencies, such as health and social care and youth offending services, as well as preventative, therapeutic and youth services, can help address a learner's individual needs. These are vital links that help to support these most vulnerable learners, and should be encouraged and supported where possible.

4.1 What's changing in assessment? (page 16)

We agree strongly with the guidance that schools should not be making 'best-fit' judgements. However, the guidance should identify clearly that these should not be made in relation to the Statements of What Matters and/or Progression Steps. The guidance could be strengthened to:

• Judgements will not be made on the overall attainment of a learner at a specific point in time, through the allocation of an outcome or a level on a 'best-fit' basis, for example in relation to Statements of What Matters or Progression Steps.

Under the heading 'why are we doing this' the proposed statement 'Assessment in the Curriculum for Wales is about continuously assessing learners' progress – not making one-off judgements at specific points in time' is accurate. However, this statement should contain a clear message about what assessment 'is' for, to support schools to use assessment effectively. It would be more helpful if it read:

 Assessment in the Curriculum for Wales is about continuously assessing learners' progress and using this information to support learning and teaching
 – not making one-off judgements at specific points in time.

4.2 Supporting learner progression: assessment guidance (Page 17 and 18)

Camau Assessing for the Future. When providing guidance on the use of the Camau resource, it needs to be made clear that these materials present one particular way of looking at progression and assessment in the curriculum, but that there are other ways of developing the curriculum successfully.

Annex 1 (page 18)

When providing guidance on schools' involvement in local and national network conversations, there needs to be clear guidance that this should influence practice in the school or setting and not just discussions. We suggest this addition to this statement:

 Is your school or setting involved in relevant national network conversations? How can learning gained through these conversations feed back into discussions <u>and practice</u> within the school or setting?

4.4 Transition from primary to secondary school guidance (page 20)

The proposed changes identify that the guidance 'also provides information on <u>voluntary</u> arrangements to support and improve transition planning – recognising that many primary schools have links with a number of secondary schools which fall outside the legal requirements for transition plans'. While we understand that schools will have to work with other schools outside of the legal framework, it is important that they are encouraged and supported to do this as effectively as possible to support learners progress and their well-being. We suggest altering the word 'voluntary' to encourage and help leaders to understand the importance of strong transition arrangements. We suggest:

 This guidance also provides information on <u>important</u>, <u>but less formal</u> arrangements to support and improve transition planning – recognising that many primary schools have links with a number of secondary schools which fall outside the legal requirements for transition plans.

Definition of a feeder primary school (page 21)

The guidance identifies that:

• 'the drawing up of transition plans <u>should be limited to instances</u> where there is an established and ongoing relationship between a primary school and a particular secondary school founded on the majority of the Year 6 cohort from the primary school transferring to that particular secondary school.'

While we recognise that there is no legal requirement for schools to draw up transition plans in other circumstances, if schools want to make plans where only a minority of the cohort transfer, we would not wish to discourage this as it could have positive benefits for pupils' progress and their well-being. Therefore, we would suggest amending the term 'should be limited to instances' to 'is statutory'. This points out clearly where the plans are required legally, but without discouraging other, potentially helpful practice.

5. Languages, Literacy and Communication

The statement on pages 21-22

 We have proposed changes to clarify the wording around the use of pictures and context to help learners understand and make sense of what they are reading.

And the two statements under Progression Steps 1 and 2 (page 22)

- I can use context and pictures to help me understand the meaning of what I read.
- I can use context and pictures to help me understand the meaning of words.

All combine to suggest that pictures and context should be used *only* to aid meaning and understanding. The proposed changes to the descriptions of learning do not consider instances when learners need to apply knowledge, other than phonological knowledge, to read words accurately. An example of this is *heteronyms*: words that are spelt the same but have different pronunciations, such as 'read', 'live', 'bow', 'lead' etc. These words can only be *read* (pronounced) correctly, when informed by the text's context. Decoding by using phonological knowledge alone is not sufficient in these instances. We would suggest these sentences are revised to read:

- We have proposed changes to clarify the wording around the use of pictures and context to help learners to read.
- PS1: When appropriate, I can use context and pictures to help me read and understand what I read.
- PS2: I can use context, my own experiences and pictures to help me read and understand what I read, and to check that the text makes sense.

5.1 Descriptions of learning (page 22)

While we agree that this is important, the description in Progression step 1 requires further clarity to identify what learners are combining these to do.

• I am beginning to develop my knowledge of grapheme-phoneme correspondence, and to combine these.

We would suggest it is strengthened to:

• I am beginning to develop my knowledge of grapheme-phoneme correspondence, and to combine these to help me to read.

Section 6. Curriculum for Wales hover-over definitions list (page 24 onwards)

In most cases, we agree with the proposed amendments to 'hover-over' definitions in the guidance. However, in a few cases, these could be further strengthened or made clearer.

Page 27

- Cognates. The revised definition provides examples of what a cognate is but does not actually define what cognates are. The original definition does. This should be retained.
- Commutative and commutativity. The word 'law' has been removed from the definition of commutative but retained in commutativity. The word 'law' should be retained in both as this is one of the laws of mathematics.

Page 28

- Computations/computational. The terms computation/al refer to 'processing data using a set of defined rules or algorithms'. Using this as an explanation would be clearer than 'making one or more calculation' as in the suggested definition.
- Consent. The proposed new definition is too broad and provides additional perspectives that add layers of complexity. The proposed definition also uses the word 'consent' to define 'consent', which lacks clarity. We suggest this simpler and much clearer definition.
 - 'When one person gives permission to another person to do something that affects them. This permission can only be given if the person has the freedom and capacity to give it.'

Page 29

- Cues. We would advise against the addition of 'in spoken contexts' to the revised definition. There can be 'linguistic cues' that point to the meaning or relationships between words.
- CWRE. We would suggest a different Welsh translation to the one suggested: 'Gyrfaoedd a Phrofiadau Byd Gwaith'.

Page 30

- Digital footprint. Using the term 'a learner's' in the definition implies that only learners leave digital footprints. This definition would be clearer if it explained it as 'The record of a user's online activities', or a similar term to 'user' that encompassed more than just 'learners'.
- Discipline-specific terminology and Discipline-specific vocabulary. These terms are
 relevant to all Areas of Learning and Experience and not just Expressive Arts. They would
 be better defined as 'Specialised or specific vocabulary or technical terms that are used
 within a particular field of study, profession, or area of expertise'.

Page 34

Grapheme-phoneme correspondence. The current and proposed definition are both
incorrect and would read more correctly as: 'Phonemes are the smallest units of sound'. It
would be better to remove the final sentence, 'As learners learn to read...' as it goes
beyond the definition.

Page 38

- LGBTQ+. We support the majority of the change to this definition, but would add 'and non-binary people' to the final sentence. This is because this is a significant group that is larger than either of the other two examples given. It would read:
 - The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations, including intersex, asexual and aromantic people and non-binary people.
- We also question the addition of the word 'people' only after the words transgender/trans.
 We would suggest removing it entirely.

Page 42

• Phonics. It would be better to remove the statement, 'In particular this includes developing use of grapheme-phonemes and combining these to decode words.' as this implies a synthetic phonics only, or preferred, approach to teaching.

Page 47

- Sex. This proposed new definition does not define the term clearly, but attempts to define
 it by explaining what it is not, or different from. We would suggest this clearer and more
 helpful definition:
 - Sex is based on biological characteristics such as chromosomes, hormone profiles and reproductive anatomy and functions (for example, genitalia). A person's sex is usually registered at birth as female, male or intersex.

Question 2 – What, in your opinion, would be the likely effects of this section of the Curriculum for Wales guidance on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

Supporting comments

The updates appear to continue to emphasise positively the importance of promoting the Welsh language, culture, and heritage as integral parts of engaging educational experiences. This aligns with the broader national goals of nurturing bilingualism and fostering a connection to Welsh identity. For example, enabling adults are encouraged to promote the unique identity of the Welsh language, culture and heritage of Wales, and encourage learners to begin to make connections between languages, including English and Welsh.

The inclusion of translations into Welsh of terms, such as 'duty bearers', which were not included previously are a positive benefit.

Question 3 – In your opinion, could these proposed amendments to the Curriculum for Wales Framework guidance be formulated or changed so as to:

 have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or

mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?							
Supporting comments							
We have added all suggestions for improvement into our responses, above.							
Question 4 – 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:							
In our recent thematic work, many school leaders shared with us that due to the online nature of the curriculum guidance, it is difficult to identify what specific changes are made when Welsh Government make amendments. As this consultation makes significant alterations to the guidance, it will be important to help schools understand what changes have been made so they can respond accordingly. It would be helpful if Welsh Government could devise a way to help schools to identify the amendments when they are published, for instance by making the updates to the guidance in a different colour font for a period of time							
Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:							