
Ymateb i Ymgynghoriad / Consultation Response

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Pwnc / Subject:	Curriculum for Wales: Guidance for education other than at school

Background information about Estyn

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

Estyn's 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 2000 and the Education Act 2005. In exercising its functions, Estyn 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 education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

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

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has 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;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

Overall, the draft guidance presents useful principles for the implementation of the curriculum for pupils in PRUs and other EOTAS settings. In responding to the consultation, we have identified where the guidance could be strengthened, including:

- further details for the design, planning and delivery of the curriculum offer for learners who have split-placements
- clarification of the responsible body for curriculum planning, monitoring and learners outcomes where a pupil has a split-placement
- additional information on roles and responsibilities for monitoring the quality of provisions
- the importance of prompt and consistent collaboration with a range of partner services to fully support learner needs
- providing examples from regional consortia or local authorities of proposals to deliver professional learning programme for practitioners or bespoke packages of support for curriculum design and delivery across PRUs and other EOTAS settings

Consultation questions

Question 1 – Do you work in or support the delivery of education?

Yes	✓	No	<input type="checkbox"/>
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i) If yes, what is your organisation? (If no continue to iii below)

Welsh-medium school (primary)		Higher education institution	
Welsh-medium school (secondary)		Diocesan authorities	
Welsh-medium school (special)		Regional consortia	
English-medium school (primary)		Local authority	
English-medium school (secondary)		Private training provider	
English-medium school (special)		Third sector	
Bilingual school (primary)		Government	
Bilingual school (secondary)		Adult community learning	
Welsh-medium middle school		Awarding organisation	
English-medium middle school		Teaching union	
Pupil referral unit (PRU)		Regulatory body (includes Inspectorate)	Estyn

Special school		Governing body/ management committee	
Funded non-maintained setting		Other (please specify):	
Further education college			

ii) What is your primary role?

Headteacher		Chancellor/vice-chancellor	
Teacher		Lecturer	
Practitioner		Pioneer	
Newly qualified teacher		Governor/ management committee member	
Teaching assistant		Challenge advisor	
Senior leader		School improvement officer	
Supply teacher		Inspector	✓
Principal/vice-principal		Other (please specify):	

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

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

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

Yes	✓	No	<input type="checkbox"/>
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v) If 'yes' please specify

Estyn

Question 2 – Is there a clear relationship between this draft Curriculum for Wales guidance for EOTAS and the published Curriculum for Wales guidance?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please explain your answer

There is a clear relationship between the Curriculum for Wales EOTAS guidance and the published Curriculum for Wales guidance. The overarching aims of the Curriculum for Wales guidance are appropriately articulated within the draft guidance to support leaders across a range of EOTAS settings.

The Curriculum for Wales EOTAS draft guidance will be strengthened with the addition of the expected examples mentioned in the introduction of the guidance document.

Question 3 – Does this guidance address the issues facing PRUs and other EOTAS providers when planning, designing and delivering the curriculum and assessment for learners?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please explain your answer

Suitable reference is included within the draft guidance on the issues facing leaders of PRUs and other EOTAS provisions for planning, designing and delivering the curriculum and assessment for learners. For example, the guidance makes useful reference to the most vulnerable young people who are likely to be attending such provision and emphasises the need for flexibility to overcome the barriers the learners may face to participating fully in education.

The guidance could be strengthened by including further details for the design, planning, and delivery of the curriculum offer for pupils who have split-placements. There needs to be clarity concerning the responsible body for curriculum planning, monitoring and learner outcomes where a pupil has a split-placement. For example, this could be between a PRU and mainstream school or EOTAS provision involving a commissioned external provider. The assessment and progression approach refers to ensuring learners are supported and challenged appropriately with strengths and achievements recognised. Areas for improvement and barriers to learning are identified suitably, as is the consideration of the individual needs of the learner. However, on page 6 it is unclear what the reference to a 'secure' curriculum design means. Also, there is not enough detail on monitoring and reporting arrangements for the curriculum offer.

The guidance recognises the need to develop and promote a nurturing approach and systematic collaboration with a range of stakeholders. In **key principles paragraph 4**, 'it is often necessary also to collaborate with partner services...' consideration could be given to strengthen the way this statement is worded to reinforce the importance of prompt

and consistent collaboration with the range of partner services necessary to support the needs of each learner fully.

Question 4 – Does this guidance support and help in planning, designing and implementing curriculum and assessment for learners in PRUs and other EOTAS settings?

Yes but needs to be strengthened	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please explain your answer

The draft guidance presents positive key principles for the implementation of the curriculum for pupils in PRUs and EOTAS provision. We feel that there are some areas where the guidance could be strengthened:

In paragraph 2 ‘systematic collaboration’, consideration could be given to changing ‘often necessary’ to ‘must’. This would strengthen a consistent approach to support learner needs. This approach will allow for a planned curriculum experience based on a deep understanding of the needs of each learner from all service providers’ perspectives. It would also strengthen the level of commitment required from service providers to meet the needs of learners.

In paragraph 3 ‘systematic collaboration’, the roles of key stakeholders are recognised, including the role of the regional educational consortia. In the Curriculum for Wales: Implementation Plan February 2020, the roles and responsibilities of stakeholders are identified and this also includes the regional consortia. Links to this document would be helpful.

Currently, the role and responsibilities of consortia in how they work to support PRUs and EOTAS providers is inconsistent across regions. To realise the expectations outlined in the Welsh Government Curriculum for Wales: Implementation plan, there is a need for further detail on plans to achieve this across this sector. For the purpose of this guidance, it would be useful to have examples from regional consortia or local authorities of proposals to deliver professional learning programme for practitioners or bespoke packages to support curriculum design and delivery across PRUs and other EOTAS settings.

Paragraph 3 ‘systematic collaboration’ refers to ‘the monitoring of the quality of provision’, and it would be helpful to clarify by whom. This aspect of the implementation planning process for the curriculum is under-developed and requires strengthening to fully support PRUs and EOTAS settings to evaluate and improve provision, as well be accountable.

Question 5 – Which aspects of this guidance do you feel are particularly helpful?

The draft guidance provides a useful source of information for leaders of EOTAS settings with relevant links to key documents.

Question 6 – Are there aspects of this guidance which you feel could be improved?

Yes	✓	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please specify what and how

‘What is EOTAS’ paragraph 2. While this is the definition in legislation, it would be helpful to acknowledge circumstances where a longer term placement may be appropriate, for example where an EOTAS setting provides vocational courses following a qualification pathway. Such placements may be over a sustained period of time to enable the learner to gain the qualification outcomes. We would suggest that the wording is amended to read ‘EOTAS is designed for short-term placements to support learners return to mainstream education and/or enable them to progress towards further education, training or the world of work’.

Current legislation

The guidance makes it clear that it does not apply to schools who fund and commission provision outside their setting. However, it may be that some aspects of this guidance would be helpful in supporting schools in their planning and quality assurance of external provision. It would be helpful to consider whether the overall Curriculum for Wales guidance to support mainstream schools who commission external provision is strong enough and whether it could be referenced within this EOTAS guidance.

Curriculum design and assessment

This section could be strengthened to provide more detail on arrangements to ensure progression for learners, particularly those with split placements. Likewise, it would be helpful to have more detail about the local authority’s quality assurance processes.

There is no mention of quality monitoring processes for split placements and who has responsibility for these processes, for example, whether this is the local authority, mainstream schools, or the PRU/EOTAS settings. Further detail would strengthen a consistent approach within and across local authorities for all learners.

Key Principles- Nurturing well being

It may be helpful to strengthen this section, particularly in the light of the current COVID-19 situation. For example, the guidance could include examples of a range of therapeutic approaches which practitioners may find useful to consider introducing in their settings. This aspect of the curriculum underpins the effective engagement of learners with learning.

Systematic collaboration -Paragraph 2

Consideration should be given to strengthening the wording of this sentence to require collaboration with a range of service providers to support the diverse range of needs of learners who access EOTAS provision. This would emphasise the important roles and responsibilities external service providers have in supporting the needs of these learners.

Access to an inclusive curriculum

This states that ‘There is a duty to keep curricula under review.’ It would be helpful to clarify who needs to carry out this review, how often and under what specific circumstances. In particular, it could be helpful to include examples or more detail to illustrate these roles and responsibilities across the range of different mechanisms for

organising or commissioning EOTAS provision to support more consistent approaches across local authorities.

General

Overall, there is little mention of learners' engagement with the curriculum offer. This may be implicit within the content but is an important area to be considered in ensuring effective curriculum access for all learners.

Question 7 – Is there any information you think should be included in this guidance?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please specify

It would be helpful to include:

- Guidance to support greater consistency of commissioning arrangements across local authorities to ensure all learners have parity in the curriculum entitlement. This aspect is recognised in the Welsh Government Review of Local Authority Commissioning Arrangements for Education Otherwise than at School Provision (2020).
- additional guidance on how to quality assure the curriculum offer
- additional information how the curriculum should be kept under review and on the specific roles and responsibilities of each provider
- further information on curriculum roles and responsibilities for the curriculum offer where learners have split-placements

Question 8 – Do you have any further points to make specifically in relation to this draft Curriculum for Wales guidance for EOTAS?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Please specify

It would be helpful to add links to these Welsh Government publications-

School Improvement Guidance: framework for evaluation, improvement and accountability. Draft guidance January 2021. [210126-school-improvement-guidance-framework-for-evaluation-improvement-accountability.pdf \(gov.wales\)](#)

Improvement Resource NEIR [Pilot NEIR section 201111 - Hwb \(gov.wales\)](#)

Question 9 – We would like to know your views on the effects that the Curriculum for Wales guidance for EOTAS 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 positive effects could be increased, or negative effects be mitigated?

Supporting comments

There is suitable emphasis on the need for the continuation of a learner's access to Welsh-medium EOTAS provision.

Question 10 – Please also explain how you believe the proposed Curriculum for Wales EOTAS guidance 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.

Supporting comments

Although the guidance identifies the need to ensure appropriate provision for linguistic continuity and progression for learners in Welsh and English, it doesn't expand on how local authorities, PRUs and other EOTAS settings should do this.

Question 11 – 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.

It would be helpful for the guidance to take account of the nine recommendations from the Welsh Government Review of Local Authority Commissioning Arrangements for Education otherwise than at school Provision (2020). [Review of local authority commissioning arrangements for education otherwise than at school provision | GOV.WALES](#)

The guidance identifies independent schools as potential EOTAS providers. As such, it places expectations on what local authorities should expect in commissioning this provision in relation to the Curriculum for Wales. However, it would be helpful if the Independent School Standards (Wales) Regulations and accompanying guidance could

be reviewed. For example, this would allow the requirement to provide learning that enables learners to develop towards the four purposes to be embedded in the Independent School Standards.

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: