

Arolygiaeth El Mawrhydi dros Addysg a Hyfforddiant yng Nghymru Her Majesty's Inspectorate for Education and Training In Wales

Ymateb i Ymgynghoriad / Consultation Response

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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

We generally support the proposals presented by Qualifications Wales and in many cases we feel that there are clear justifications for any proposed changes. However, we have raised a few concerns, mainly relating to the size and breadth of some qualifications, for example, language and literature. In addition, we have also raised concerns about a few of the proposals to create new qualifications, such as the mathematics proficiency test.

We support the proposals to develop and create qualifications that set high expectations and challenge learners whilst ensuring they prepare them for future study, training and employment.

We welcome the commitment of Qualifications Wales to continue their engagement with a wide range of stakeholders and the intention to continue this interaction as part of the final design process.

Whilst we welcome many of the proposal outlined, it would be helpful to understand the approach to developing vocational qualifications and how these provide a broad offer for learners alongside GCSEs. This will enable us to consider how the suite of qualifications support learners to access a broad range of qualifications that meet their needs and aspirations.

Consultation questions

Proposals

We have grouped the proposals in this consultation according to the six Areas of Learning and Experience ('Area'/'Areas') as described in the Curriculum for Wales Guidance ('Curriculum Guidance'). There is also a section on assessing what the Curriculum Guidance refers to as integral skills.

Each section gives an overview of the proposals along with some questions asking for your views.

Subject	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Art and Design	x					
Drama	х					
Music	x					

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

Please explain your answer:

We agree with the proposal to review and reform these existing qualifications in the Expressive Arts. It would be helpful to ensure that learners are able to access qualifications that offer a multi-disciplinary approach to this area of learning and experience. To support this, we agree that working closely with stakeholders when determining the content of the new qualifications will be important.

We welcome the reference to digital technology in supporting the assessment process. It will be important for assessment in the arts to reflect the intended audience for the artefact or performance, recognising the importance of direct communication between art, the artist and audience which is sometimes not supported well enough by the use of digital technology.

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

Strongly agree ☑

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We strongly support the proposal to create a new GCSE in Film and Digital Media to replace the existing GCSE Media Studies.

This provides useful opportunities to develop a qualification that is specifically designed to reflect the requirements of the Expressive Arts area of learning and experience. This will support the inclusion of creative use of media for artistic and communication purposes.

We also support the intention to consider progression routes and career pathways given the opportunities available in the creative industries in Wales.

We agree that it would be useful to consider how this GCSE will relate to common aspects of digital technology and media which might be included in other GCSEs such as ICT and art and design. We welcome the commitment to ensuring coherence within and across disciplines.

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

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We welcome the intention to ensure that alternative qualifications that assess dance such as the ISTD and BTEC qualifications are available, but we also believe there is a need for a made-in-Wales dance qualification that reflects the principles of the Curriculum for Wales and Expressive Arts area of learning and experience.

If a qualification for dance is not included in the full portfolio of qualifications, it may limit choice and flexibility for learners, particularly if they want to combine GCSE dance with other Expressive Arts qualifications.

If the proposal is `to run with the designed-for-England GCSE for dance, there is a risk that the content of this qualification will not reflect the specific rationale and purposes of Curriculum for Wales.

Qualifications Wales may wish to consider how examination of dance could be linked to examination of this discipline in physical education.

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

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We generally support the proposal to continue to give schools a choice of qualifications in the Expressive Arts which provide the opportunity for learners to choose their area of study without the necessity to concentrate on a specific specialism or to combine a specialism with other arts disciplines. However, as with the proposal for dance which will rely on made-in-England qualifications, we believe that over-reliance on qualifications such as the BTEC is concerning, particularly given the uncertainty around the future for this qualification. In addition, and as previously mentioned, this approach will not reflect the principles and rationale of the Curriculum for Wales and, in particular, the importance in the Expressive Arts AoLE of the creative process which is a key component.

Qualifications Wales may wish to consider offering a discipline specific route alongside a made-in-Wales multi-disciplinary route. This will help learners, where appropriate, to combine their artistic strengths and talents. To support the success of this, consideration should be given to supporting professional learning and recruitment issues in teaching these qualifications, as well as working closely with the wider expressive arts education community and industry to ensure that the qualification is fit for purpose in Wales and more widely.

If there is to be a mixture of made-for-Wales qualifications and made-in-England qualifications, it will be important to ensure that learners experiences are equitable with other AoLEs.

Health and Well-being

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

Strongly agree

Tend to agree Ø

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We fully support the proposal not to create a new qualification in the Health and Well-being Area of Learning and Experience (AoLE). The success and achievement in certain aspects of health and well-being would be difficult to measure and assess as part of a qualification.

We suggest that creating a suite of smaller qualifications within this AoLE may not be helpful to all learners. In our thematic report '<u>Healthy & happy</u>' (Estyn, 2019), we noted: 'A few secondary schools use qualifications to accredit pupils' learning in personal and social education. Learning in these schools often becomes focused on completing tasks associated with the qualification, and lessons are less likely to feature engaging and meaningful learning experiences about important health and wellbeing issues. In these schools, the pressure for pupils to gain accreditation for learning has unhelpfully superseded the intrinsic value of good learning experiences.'

If they are to be included, references to any smaller qualifications should be worded very carefully to enable schools to understand the intention for them.

Qualifications Wales may wish to consider whether the Citizenship GCSE in England would be useful as a made-for-Wales qualification to help broaden the scope of qualifications in this area of learning and experience and as a means to supporting leaners to develop a deeper understanding of democracy, politics and law.

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

Subject	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Food and Nutrition	x					
Physical Education	x					
Health, Social Care and Education	x					

Please explain your answer:

We agree with the need to review and reform these qualifications. They should continue to support progression to further learning as well as into future employment.

Humanities

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

Subject	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Business	х					
Geography	Х					
History	х					
Religious Studies	x					

Please explain your answer:

We welcome the review and reform of the content and assessment of the GCSEs in Business, Geography, History and Religious Studies. We also welcome the comments about making connections between and within the range of disciplines. This will continue to support pathways to future study and employment. The suitability of these qualifications for all learners is also an area of consideration.

We support the comments relating to streamlining the content when designing the new qualifications for these subjects.

It may be helpful to consider ways in which the content and mode of assessment of these new GCSEs can differ to the qualifications that are currently in existence. Other accreditations, such as the John Muir Award, offer learners opportunities to study elements of the humanities. These could be considered to support access to provision outside Level 1 or Level 2 qualifications.

We think that ensuring an option for accreditation of Religious Studies, in light of its status as a compulsory element of the new curriculum, is sensible.

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

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

Whilst we recognise that this may support the delivery of the statement of what matters five in Humanities, we would encourage Qualifications Wales to consider whether there are alternative approaches, for example, to consider if this element of 'participation' could be included in the subject specific GCSEs that are planned.

It is important that when developing new qualifications, concepts such as cynefin, local-national-international links and cross cutting themes such as equality and diversity need to be considered in all options, not within one subject only.

Consideration will need to be given to professional learning and subject specialism implications. Our inspection and thematic evidence indicates that the most effective teachers and departments have deep subject knowledge and are able to adapt their approaches accordingly. This is evidence in our <u>improving teaching</u> and <u>good practice in humanities</u> thematic reports.

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

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

Whilst we recognise the aim to encourage a multidisciplinary approach within this AoLE and understand how this may benefit some learners, we are unclear of the rationale to some of these proposed changes, including making this a double award.

We support the requirement to explore this in more detail. It will be important that any future qualifications continue to provide sufficient depth and breadth of study to enable all learners to progress to further study and employment. Currently, we are unsure that this proposal will support learners well enough to progress to study individual disciplines at A level.

Language, Literacy and Communication

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

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

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree Ø

Strongly disagree

Don't know

Please explain your answer:

The size and breadth of a combined language/literature qualification is a significant consideration. If these qualifications were to be combined, a dual award would be preferable as this would support appropriate challenge, time and reward.

These proposals may prevent learners studying English/Welsh in sufficient breadth and depth to support future study, particularly at A level. This may also prevent access to a broader, more diverse, richer collection of literature that would stimulate learners' interest in both language and literature.

It is unclear whether the definition of literature within this proposed combined course aligns suitably with that at A Level, in order to prepare learners adequately to study at this level. Literature is defined in a separate statement of what matters in the Curriculum for Wales. The aim was to give it prominence and to reflect the importance of giving learners experiences which build a lifelong love of literature.

An un-tiered approach currently works well for the language qualifications, but if applied to literature it may result in too many learners following shorter, often lesschallenging texts. It could also lead to all learners studying the same texts, regardless of the level of challenge. Texts studied for literature should be relevant and contemporary to learners.

We fully agree that working closely with stakeholders when determining the content of the new qualifications is a key factor. Our <u>A Level Welsh first language</u> thematic report found that learners feel strongly that the assessment conditions for Welsh Literature GCSE place too much of a focus on memorising poems [10 poems] and comparing one of these with an unseen poem on the paper. In English literature, they are asked to compare two unseen poems; therefore they do not have to learn any poems beforehand. They would prefer that the assessment requirements focus on their ability to analyse and appreciate poetry rather than learn them.

There is a risk that a combined qualification will not provide sufficient portability and consequently disadvantage pupils from Wales when competing with learners from other nations. If the combined qualification continues to be an approach, we would encourage Qualifications Wales to consider making this a double award qualification to help overcome such challenges.

In the current Welsh GCSE Language specification, 30% of the assessment criteria is oracy. It is crucial to keep the emphasis on speaking and listening as in the present specification. The spoken element is key to the Welsh Government Welsh language strategy, Cymraeg 2050: a million Welsh speakers, which sets out the ambitious target of reaching a million speakers by 2050. This aspect is also more of a priority in the Welsh qualification as learners who study the subject come from a range of linguistic backgrounds and speaking the language is paramount to the success of the qualification.

2. How far do you agree or disagree with our proposal to discontinue GCSE Welsh Second Language and create a new, bigger GCSE designed for learners in English-medium contexts?

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

Strongly agree Tend to agree **Neither agree nor disagree** ☑ Tend to disagree Strongly disagree

Don't know

Please explain your answer:

We support the proposal to discontinue GCSE Welsh Second language and to create a new qualification for leaners in English-medium contexts. We would encourage Qualifications Wales to consider the size and breadth of this qualification. It may be that a single award would be sufficient if there continues to be a strong enough focus on developing learners' speaking and listening skills in Welsh. If the size of the qualification were to be increased, consideration would be needed with regard to professional learning and recruitment issues for teachers.

It will be important that any changes to this qualification are consulted on regularly with leaders and practitioners.

The current (reformed) full course specification GCSE Welsh Second Language has set aspirational aims where the main assessment focus is on speaking and listening [50%]. This supports Welsh Government's aim of reaching the target of a million speakers by 2050. It will be important to maintain the current focus on speaking and listening skills in any new specification.

The key aim should be on measuring learners' progress in speaking Welsh with increasing confidence and fluency in a range of situations outside of the classroom, and/or spontaneously with others. In addition, learners should acquire the necessary skills in the fluency of oracy and literacy to support their linguistic development. Qualifications Wales may wish to consider successful approaches in the Welsh for Adults sector to support these developments.

We welcome that the qualification will be mapped in relation to a framework such as the CEFR so that learners can see how their achievement relates to other language qualifications in the spirit of the new AoLE 'language that connects us'.

Recruitment and professional learning to support effective Welsh Language teaching are two key areas that pose challenges. However, more cohesion between Welsh for Adults sector and Welsh in English-medium settings could be a very valuable forum to share good practice, methodology and common approaches.

To support learners to understand the benefits of being multilingual, this qualification should consider making learners aware of the advantages of learning Welsh and becoming bilingual. Engagement with this area can therefore foster in learners pride in their sense of identity and belonging to Wales as well as the world.

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

Strongly agree Tend to agree **Neither agree nor disagree** ☑ Tend to disagree Strongly disagree Don't know Please explain your answer: We would welcome more information about the rationale for this proposal. Consideration will need to be given to the size and breadth of these qualifications and whether they will support learners well enough to develop their language skills. We would also welcome additional information about how these qualifications would support and enhance progression to post 16 study.

As these would be studied in addition to the main qualifications, more clarity is required around the manageability for schools, the currency of these qualifications and how would these support the main overarching qualification.

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

Strongly agree

Tend to agree Ø

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We agree with the case for reconsidering the model for teaching and assessing languages, not least to include opportunities for learners to demonstrate translanguaging skills.

Any qualifications should ensure that learners have opportunities to develop the full range of language skills to reflect how language is acquired.

Mapping can-do statements of smaller made-for-Wales qualifications against the CEFR (as set out in proposal 5) and also GCSEs may be helpful in ensuring learners have their competence formally recognised. This would allow learners to see the route of progression from early language learning and beyond.

To prevent the decline in uptake of international languages, a significant consideration is needed with regards to curriculum time implication, professional learning and recruitment issues. The depth of study required, particularly for learners who want to study language post-16, is also a key factor.

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

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We generally support this proposal. However, consideration should be given to making sure that these do not reduce the viability of full course study of international languages.

Any qualifications should ensure that learners have opportunities to develop the full range of language skills to reflect how language is acquired. Being able to work across languages in real life is an important and valuable skill. Any new or small qualifications should ensure that learners have sufficient competence in a broad range of skills to allow secure progression to further study.

Due consideration would need to be given to assessment options for this qualification to minimise the risk of rote learning at the expense of independence.

Referencing both GCSEs and a set of small, made-for-Wales qualifications against the CEFR should emphasise and illustrate the progression between the two, so that they are not only seen as standalone qualifications but can also be regarded as a progression route from language learning in the primary phase, right up to school leaving age and beyond.

We support the aims of multiple language learning post-14. However, we see this as a longer term aim, with short and medium term steps. This also requires a coherent strategic policy for languages which takes account of teacher recruitment and professional learning.

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

Strongly agree ☑

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We fully support this proposal and welcome the inclusive approach this will continue to promote.

The proposals will support the additional guidance on British Sign Language and ensure that that deaf and hearing impaired learners are able to access education in the language of their choosing.

Mathematics and Numeracy

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

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

Strongly agree

Tend to agree

Neither agree nor disagree Ø

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We agree with the proposal to combine the two qualifications, although we do not fully agree with the proposal to make this new combined qualification equivalent to one and a half GCSEs.

Currently, most schools teach the two qualifications together. In addition, there is a large overlap in the content of the two current qualifications and therefore combining these into one qualification would decrease the burden of assessment on candidates. This approach would also enable questions to be set in more authentic and challenging contexts.

The new mathematics and numeracy curriculum emphasises the importance of developing the five proficiencies of

- o conceptual understanding
- o communication using symbols
- o fluency
- o logical reasoning
- o strategic competence

We believe that combining the two qualifications will support teachers to plan stronger opportunities for learners to develop these proficiencies in a wide range of contexts. In addition, employers indicate that they require learners to have an adaptable understanding of mathematical concepts that they can apply in the workplace. Curriculum for Wales has been developed to enable learners to have a deeper understanding of mathematics so that they can be adaptable and apply their knowledge and skills to unfamiliar situations. The joining of these qualifications will support these aims.

This new qualification will also help employers to understand more easily the qualifications that learners have and will make the qualification more comparable to the other home nations. This will enable our learners to be treated equitably when applying for further study or employment outside of Wales.

Our inspection evidence indicates that currently there is too much teaching to the test which may prevent learners developing their mathematical proficiencies and gaining a deep enough understanding of mathematical concepts. Therefore, it may be worth considering implementing measures to reduce the predictability of questions in examinations to encourage teachers to develop more rounded and adaptable mathematicians.

The introduction of the mathematics-numeracy qualification in Wales has supported the improvement in Wales' performance in mathematics in PISA over the last two cycles. Learners are beginning to demonstrate a deeper conceptual understanding of mathematical concepts that they can adapt and apply to solve problems. Our thematic report on the <u>new GCSEs</u> (Estyn, 2018) noted improvements in the quality of teaching in mathematics as centres have identified the difficulty in 'training' learners to succeed in the mathematics-numeracy qualification. In addition, a minority of centres place more emphasis on preparing pupils for the more predictable GCSE mathematics qualification. Combining the two qualifications will ensure that learners develop the five intertwined proficiencies.

We do not fully agree with the proposal to make this new combined qualification equivalent to one and a half GCSEs. It may be helpful to consider this as a double award qualification (equivalent to two GCSEs) to enable all learners in Wales to get recognition for the wide range of study required and to avoid the reduction of mathematical concepts and proficiencies being taught.

It is important that all qualifications developed support learners to demonstrate their knowledge, skills and understanding and support them to progress to their next steps and enter employment or further education or training. The Confederation of British Industry has noted that high levels of literacy and numeracy skills are the lifeblood of an economy. Ensuring that future generations have good mathematics and numeracy skills is important for the future of the Welsh economy.

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

Strongly agree

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree ☑

Don't know

Please explain your answer:

We do not agree with the proposal to introduce a numerical proficiency test, using an on-screen assessment method and would welcome the opportunity for further discussion. We present the following reasons for our view:

- There is a clear focus in the new mathematics and numeracy curriculum on developing the five proficiencies. There have been improvements in the teaching of mathematics over the last few years with teachers providing more opportunities for learners to solve problems and reason mathematically. The unpredictable nature of the mathematics-numeracy papers is also encouraging teachers to teach learners to understand mathematics rather than 'training' learners to pass the test. This online test of 'numerical proficiency' may undermine this work. The new core qualification should be a measure of learners' numerical proficiencies. In addition, the fact that learners would be able to take this assessment a number of times may reduce the validity of this qualification.
- Employers are eager to have employees who have strong literacy, numeracy skills and problem solving skills. It is likely that qualification would limit learners' opportunities to develop and apply their mathematical skills in a range of contexts.
- Employers, colleges and universities may not understand this new proficiency qualification and it may disadvantage learners that achieve this, in comparison to a qualification in mathematics and numeracy. To overcome this there would need to be a significant amount of marketing to support all stakeholders to understand it. When considering a similar qualification for oracy in Welsh and English in the past, this did not support

learner progression or enable the wider community to understand what this aspect of the qualification was.

- When teaching learners who face difficulties understanding mathematics, if the teacher is successful in creating a supportive environment and the teaching is strong enough, then all learners can enjoy mathematics and develop their knowledge, skills and understanding.
- 3. How far do you agree or disagree with our proposal to create a made-for-Wales Level 2 qualification in Additional Mathematics?

Strongly agree Ø

Tend to agree

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We agree strongly with the proposal to create a made-for-Wales Level 2 qualification in Additional Mathematics. This qualification currently supports learner progression well, it has a strong take up and learner feedback is generally positive.

Science and Technology

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

Subject	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Computer Science	x					
Built Environment	x					
Design and Technology	x					

Digital	х			
Technology				

Please explain your answer:

We agree with the proposal not to develop a single general qualification in technology. While there are links between disciplines, it would be difficult for a general qualification to give learners enough depth of learning in each area to allow for further study. However, it would be beneficial for separate qualification specifications to highlight clear overlaps between disciplines within the AoLE where they exist.

Qualifications Wales may wish to consider the approach to digital technology and computer science to ensure that learners are functionally digitally competent but also have opportunities to control and programme technology. This may help to exploit the connections between the two qualifications such as coding, data and communication elements.

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

Strongly agree

Tend to agree Ø

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We generally support this proposal. It will be important that there are clearly defined intentions and assessment processes within this qualification, including, making use of the important links between mathematics and numeracy and science and technology AoLEs.

The proposal for an engineering GCSE may support learners' future progression well by enabling them to develop and apply mathematics and scientific skills in a purposeful and meaningful context.

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

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

Strongly agree

Tend to agree

Neither agree nor disagree \square

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We generally support the proposal to create new GCSE science qualifications. However, we do not support fully the removal of separate science qualifications. These are very helpful qualifications for learners that support future progression well.

It is useful to consider the messages from PISA 2018; Wales' middle and lower ability learners compare reasonably well with other countries for the sciences. It is our highest performing 10% of science learners who underachieve compared with similar learners across the OECD. This, together with our experience that learners find the transition from GCSE Science (double award) to AS level study particularly challenging, suggests that the standards and expectations for science at GCSE need to be considered carefully.

With regard to the discontinuation of the separate sciences GCSEs it is unclear whether the new double award science qualification will develop learners' understanding to sufficient depth.

We agree in principle that the current applied sciences route would benefit from change and that discontinuation is a valid option. This will add to the demands on the range of the double award, which will need to cater for all learners by ensuring that content is relevant to their experience and will be useful in their later lives.

4. How far do you agree or disagree with our proposal to create a set of small science qualifications that can be taken in addition to the proposed new GCSE Science qualification?

These units are likely to be equivalent in size to either one-third or two-thirds of a GCSE.

Strongly agree

Tend to agree

Neither agree nor disagree ☑

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

We would welcome more information about the rationale for this proposal. While there could be benefits of this approach, consideration will need to be given to the size and breadth of these qualifications and whether they would support learners well enough to develop their scientific skills. It may also be difficult for employers and universities to understand the value of such qualifications and we would suggest careful consideration is given to this.

As these would be studied in addition to the main qualifications, more clarity is required around the manageability for schools, the currency of these qualifications and how would these support the main overarching qualification.

There is a risk that any awarding organisations may find it difficult to offer these additional qualifications due to the small number of pupils that may wish to take them in Wales at any given time.

Integral Skills

- 1. How far do you agree or disagree with our proposal to reform the SCC to make it simpler and more manageable, with a focus on assessing the Integral Skills of:
- Creativity and Innovation
- Critical Thinking and Problem Solving
- Personal Effectiveness
- Planning and Organising

Strongly agree

Tend to agree Ø

Neither agree nor disagree

Tend to disagree

Strongly disagree

Don't know

Please explain your answer:

Generally, we support the need to make this qualification more manageable. This proposal should help learners and centres to have greater understanding of the qualification and the benefits it can provide.

We support the proposal to design a Skills Challenge Certificate that assesses all four of the integral skills. This will encourage centres to support learners to develop and apply these skills across all components.

With regard to the assessment of skills in this qualification, it is important that as this qualification is developed, there is a need to clarify the expectations for skills and outline how they may be assessed. This will support teachers to put a suitable emphasis on learners' skills development. In addition, it will be important that literacy, numeracy and digital skills remain an integral part of this qualification. This will support learners to continue to develop and apply these skills in a range of contexts.

Impact assessment questions

As a public body, Qualifications Wales is required to assess the likely impact, both positive and negative, of regulatory decisions we take. We are also required to assess the potential impact of our regulatory decisions on the Welsh language. Additionally, we are also required to consider the potential impact of the proposals included in this consultation on persons who share protected characteristics under the Equality Act 2010.

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

If so, please outline these steps in the space below.

Qualifications Wales have identified many of the important risks and the steps to mitigate these. However, throughout our response we have identified certain concerns, such as the creation of smaller qualifications and reducing the size of qualifications. Qualifications Wales may wish to identify steps to mitigate against these.

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

(If you have identified both positive and negative impacts, please select both options in the list below).

Yes – there are other positive impacts Yes – there are other negative impacts No – there are no other impacts Unsure

If you have identified other impacts, then please explain them below.

Whilst we welcome many of the proposal outlined, it would be helpful to understand the approach to developing vocational qualifications. This will enable us to consider how the suite of qualifications support learners to access a broad range of qualifications to meet their needs and aspirations.

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

(If you have identified both positive and negative impacts, please select both options in the list below)

Yes – there are other positive impacts Yes – there are other negative impacts No – there are no other impacts Unsure

If you have identified other impacts, then please explain them below.

There would be a negative impact if other awarding bodies refuse to offer qualifications bilingually.

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

(If you have identified both positive and negative impacts, please select both options in the list below)

Yes – there are other positive impacts

Yes – there are other negative impacts No – there are no other impacts Unsure

If you have identified other impacts, then please explain them below.

These proposals will have a positive impact on the Welsh language and will support Wales to secure an equitable, coherent, and bilingual choice of qualifications for all 16 year olds.

It will be important that all learners/centres can access bilingual documentation and guidance to ensure this is fulfilled.

It is also essential that all qualifications are offered bilingually to meet the need of the Welsh Government policy of 'Cymraeg 2050: A Million Welsh Speakers'.

Qualifications Wales should aim to ensure that all future qualifications developed specifically for Wales are made available through the medium of Welsh and English.

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

(If you have identified both positive and negative impacts, please select both options in the list below)

Yes – there are other positive impacts Yes – there are other negative impacts No – there are no other impacts Unsure

If you have identified other impacts, then please explain them below.

The impact on the size of the 1.5 GCSE in subjects not being comparable with similar subjects offered in England.