
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, 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 Tertiary Education and Research Act 2022 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 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.

Our remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, all age schools, secondary 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;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Response

Introduction

On the whole, we agree with the proposals to implement conditions that require awarding bodies to promote the availability of Welsh-medium qualifications and facilitate access to them. The proposals work towards providing suitable information and opportunities for users of qualifications, including learners, schools and colleges, regarding the availability of Welsh-medium qualifications and we are in favour of this. We believe that there are a few points to be considered further.

These include:

- that all aspects of the conditions are robust and clear to ensure that awarding bodies implement them in full so that all learners/centres are able to have full access to bilingual documentation, guidance and resources in all qualifications
- access to high quality professional learning and initial teacher education to be able to promote and teach Welsh-medium qualifications successfully
- to consider the obstacles caused by socio-economic factors, such digital equity and poverty, when creating bilingual qualifications

Consultation questions

#	Questions	
Conditions and Requirements		
1	<p>To what extent do you agree or disagree with our proposal to require all awarding bodies to publish a Welsh-medium qualifications policy statement?</p> <p>Explain your answer below.</p> <p>We agree strongly that implementing conditions to require governing bodies to promote the availability of Welsh-medium qualifications and facilitate access to them is important. To ensure fairness and equal opportunities for all pupils, schools and colleges in Wales, it is important to aim to have a full offer of qualifications that are fully bilingual. This is already in place through the 'Qualified for the future' consultation, so the progression for vocational courses and the world of work is also important.</p>	
2	<p>To what extent do you agree or disagree with our proposal to require awarding bodies that offer qualifications through the medium of Welsh to promote the availability of, and facilitate access to, these qualifications?</p>	

	<p>Explain your answer below.</p> <p>We agree with this statement. Once again, it is important that all learners in Wales have full access to all qualifications in Welsh, as well as in English.</p> <p>It is also vital that all qualifications are offered bilingually to meet the policy requirements of Welsh Government's 'Cymraeg 2050: A million Welsh speakers'.</p> <p>These proposals will have a positive effect on the Welsh language and will support Wales to ensure a fair, cohesive and bilingual selection of qualifications for all children aged 16 and over.</p> <p>It will be important that all learners/centres are able to access bilingual documentation, guidance and resources simultaneously to ensure that the aim is achieved. In light of this, it is also important to ensure that awarding bodies offer full support in terms of professional development to train teachers to deliver the qualifications successfully through the medium of Welsh as well as English.</p>	
3	<p>To what extent do you agree or disagree with our proposal to introduce minimum requirements that we consider necessary for awarding bodies to ensure compliance with the proposed Conditions?</p> <p>Explain your answer below.</p> <p>We agree with the proposal that awarding bodies comply with the proposed Conditions. The proposed Conditions would require an awarding body to publish a policy statement through which open, accurate and clear information can be conveyed to learners and users of qualifications. A huge emphasis on the fact that this policy will be reviewed regularly and revised, where appropriate, would also be beneficial. However, it is not clear in 3.6 that it is a statutory requirements for awarding bodies to adopt the conditions in full as this is based on costs. Greater clarification here about the expectations of Qualifications Wales would be beneficial.</p> <p>Although awarding bodies are free to choose which promotional activities would be most suitable for them, it is important that Qualifications</p>	

	Wales ensures that awarding bodies meet its requirements.	
4	<p>To what extent do you agree or disagree with our proposal to include these requirements as part of our Standard Conditions of Recognition?</p> <p>Explain your answer below.</p> <p>We agree with the proposal to include the requirements as part of the Standard Conditions of Recognition. By doing so, this ensures that awarding bodies and their qualifications must satisfy rules when offering qualifications to learners in Wales. It is a way to ensure that all qualifications developed specifically for Wales in the future are available through the medium of Welsh and English and that all learners/centres are able to access bilingual documentation, guidance and resources simultaneously.</p>	
5	<p>To what extent do you agree or disagree with our proposal for an initial period of 12 months for awarding bodies to ensure that they comply fully with the proposed Conditions and requirements?</p> <p>Explain your answer below.</p> <p>We believe that an initial period of 12 months is appropriate. This aligns with the changes in terms of 'Qualified for the future' and provides an opportunity for schools and colleges to see and understand the offer that is available to them in terms of qualifications. It is important that schools and colleges are given an opportunity to prepare and express any concerns as quickly as possible to ensure that the new qualifications that are implemented run as effectively as possible. Teachers also need time to develop their knowledge and understanding of new specifications and an opportunity to work and plan with their peers. This is particularly important for staff who work in small schools or one-teacher departments. Access to high quality professional learning and initial teacher education is vital to its successful implementation. It must be borne in mind that recruitment and professional learning to support effective Welsh-medium education are two key areas that create challenges.</p> <p>It is also important that all guidance in the 'Integrated Impact Assessment' is clear and robust to ensure that awarding bodies comply</p>	

	fully, rather than partially, with the proposed conditions and requirements.	
Guidance		
6	<p>Are there areas that have not been included in our proposed guidance that you would like to see included?</p> <p>Do you have any further comments on our proposed guidance?</p> <p>We believe that Qualifications Wales should aim to ensure that all qualifications that are developed specifically for Wales in the future should be available through the medium of Welsh and English.</p> <p>When creating a marketing campaign, it is important to consider that awarding bodies show the purpose and benefits of the qualification to learners, parents, teachers and other stakeholders e.g., employers.</p> <p>It is also important to consider the importance of professional development to train teachers to deliver the qualifications successfully and their availability through the medium of Welsh.</p> <p>We also believe that it is vital that these bilingual qualifications are available to our schools alongside our colleges. There is concern at present that some qualifications, such as childcare, exclude schools. It must be borne in mind that a significant number of our learners study through the medium of Welsh in schools as well as colleges.</p> <p>In a worrying financial situation, it is important that all stakeholders have equal access to bilingual courses and that Welsh-medium schools are able to receive funding to provider courses that have bilingual units.</p>	Open Response
Regulatory Effects		
7	<p>Please provide any comments about the regulatory effects that are identified.</p> <p>Are there any regulatory effects, including costs, savings or other advantages, that have not been identified that arise from the proposals? If so,</p>	Open Response

	<p>what are the effects and are there any additional steps that can be taken to reduce the regulatory effect of the proposals?</p> <p>Please provide estimated figures in terms of costs, where possible.</p> <p>In a worrying financial situation, it is important that all stakeholders have equal access to bilingual courses and that Welsh-medium schools are able to receive funding to provider courses that have bilingual units.</p> <p>A combination of knowledge, subject skills and pedagogical skills will also be needed to deliver these qualifications successfully. Schools will also need specialist equipment and resources so that learners are able to engage with all aspects of the qualifications. It must be remembered that recruiting specialist staff to support effective Welsh-medium teaching is a key area that causes challenge. The proposals do not acknowledge fully all of the potential challenges in schools in terms of providing for, and implementing, the new suite of qualifications effectively.</p>	
<p>Equality Impacts</p> <p>We have identified ways in which our proposed Conditions and requirements may have an impact (positive or negative) on people who share specific protected characteristics (e.g. disability, race, gender, religion or belief) and those from socio-economically disadvantaged backgrounds.</p>		
8	<p>Please provide any comments on the equality impacts that have been identified.</p> <p>Are there any other potential impacts that we have not yet identified? If so, what are they and what additional steps could be taken to reduce any negative impacts on these people?</p> <p>Awarding bodies need further clarification about the arrangements for qualifications and provision of digital resources, particular when considering socio-economic factors such as digital equity and poverty. On-screen qualifications could also prove difficult for some schools in terms of resources, particularly considering school budgets and web connectivity.</p>	Open Response

Impacts on the Welsh language

We have identified ways in which our proposed Conditions and requirements may have an impact (positive or negative) the Welsh language, in particular on opportunities for people to use the Welsh language and for the Welsh language not to be treated less favourably than English.

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Please provide any comments of the impacts on the Welsh language that have been identified.

How could the positive impacts on the Welsh language be increased or how could the negative impacts be reduced?

Are there any other potential impacts that we have not yet identified? If so, what are they?

It is also vital that all qualifications are offered bilingually to meet the policy requirements of Welsh Government's 'Cymraeg 2050: A million Welsh speakers'. These proposals will have a positive effect on the Welsh language and will support Wales to ensure a fair, cohesive and bilingual selection of qualifications for all 16-year-olds.

It will be important that all learners/centres are able to access bilingual documentation, guidance and resources simultaneously to ensure that the aim is achieved.

We believe that Qualifications Wales should monitor and check that all qualifications developed specifically for Wales in the future are available through the medium of Welsh and English.

Open Response