

**Welsh Government  
Curriculum for Wales 2022  
19 July 2019**

**Executive summary**

- The NASUWT is clear that in many respects, the current curriculum framework is not fit for purpose and is in need of reform.
- In general, the report of the review of the curriculum undertaken by Professor Graham Donaldson, *Successful Futures*, set out a coherent and rational basis for the future development of the curriculum framework in Wales.
- However, in a range of critical respects, the proposals for the curriculum published by the Welsh Government have failed to reflect many of the key principles articulated in *Successful Futures*.
- In particular, the recommendation that the curriculum should be developed by the workforce, for the workforce, has not been given practical effect. The exclusion of the voice of the profession has resulted in a proposed curriculum model that would, if implemented, generate significant workload burdens for teachers and undermine the ability of schools to secure for all children and young people their entitlement to a broad and balanced range of learning experiences.
- The failure to develop a coherent implementation plan is a serious omission. As a result, it is not clear how the new curriculum would be resourced and how it would cohere with the qualifications framework. Strategic issues in respect of the workforce implications of curriculum reform have not been subject to meaningful evaluation and planning, particular in respect of subject specialisms in the secondary sector.
- The implications of the new curriculum for the school accountability regime and the future of the National Literacy and Numeracy Framework have yet to be finalised, despite their importance for the ways in which schools organise their curricular offers.

- Proposals to make greater use school self-evaluation in the context of school accountability would, if implemented, risk significant increases in workload and would be likely to distract teachers and school leaders from their core responsibilities for teaching and leading teaching and learning.
- While the NASUWT recognises that a key aim of the reform process was to address the shortcomings of the current levels-based assessment system, the proposals set out in the consultation document would simply replicate many of these problems and fail to secure consistent and manageable assessment practice across the education system. The assessment proposals would also pose a risk, in practice, to curricular breadth and balance by giving undue prominence to achievement outcomes in the design of schools' curricular programmes.
- There is a clear failure on the part of the Welsh Government to recognise that reducing curricular prescription will not, of itself, secure enhanced scope for teachers to make use of their professional discretion. Schools will retain significant power to impose curricular and assessment approaches on teachers in classrooms.
- The NASUWT remains clear that it will take all legitimate steps, up to and including industrial action, to defend its members from any adverse consequences for their terms and conditions of employment arising from the process of curriculum reform.
- The Welsh Government should work with the NASUWT and other relevant stakeholders to develop a strategic implementation plan to ensure that the issues noted above are addressed and to secure a sustainable and effective national curriculum framework.

1. The NASUWT welcomes the opportunity to comment on draft materials and guidance for the Welsh Government's Curriculum for Wales 2022.
2. The NASUWT is the largest teachers' union in Wales representing exclusively teachers and headteachers.

### **GENERAL COMMENTS**

3. The NASUWT maintains that securing high outcomes for all children and young people means that action is needed to:
  - provide a broad, balanced and relevant curriculum experience fit for the 21<sup>st</sup> century;
  - ensure parity of esteem between academic and vocational pathways and the cognitive, emotional, cultural, creative, ethical and social dimensions of learning;
  - require all state-funded schools and colleges to work together to secure a comprehensive curriculum entitlement for all 14 to 19 year-olds;
  - equip children and young people to be research-driven problem solvers;
  - extend entitlements for all children and young people to high-quality academic and vocational education, coupled with equality of access to high-quality, practical, hands-on, work-based learning opportunities;□
  - refocus the accountability system to reflect and support the expectation that all young people should remain in education and training until the age of 18;
  - restore the morale of the teaching profession by tackling poor employment practices, including workload, securing professional entitlements and respect for teachers, and refocusing the efforts of teachers and headteachers on their core responsibilities for teaching and leading teaching and learning;

- establish a Masters-level profession and raise the pay of teachers in recognition of the increased knowledge and skills that they bring to the job; and
  - ensure access to high-quality professional development for all teachers throughout their careers.<sup>1</sup>
4. It is clear that in many respects, the current curriculum framework does not meet these important tests. For this reason, the NASUWT supported the Welsh Government's decision to commission a fundamental review of curriculum and assessment arrangements.
  5. This review, conducted by Professor Graham Donaldson, was characterised by clear terms of reference and an unambiguous commitment to stakeholder engagement, including engagement with teachers, headteachers and their representative organisations.
  6. This understanding of the critical importance of the workforce in the development of the curriculum and assessment policy was reflected in the analysis set out in Professor Donaldson's report, *Successful Futures*, and its principal recommendations.
  7. While the NASUWT raised some concerns about aspects of the outcomes of Professor Donaldson's review, particularly in relation to its proposed approach to assessment, the Union was clear that *Successful Futures* set out a coherent and rational basis for the future development of the curriculum. In particular, the NASUWT welcomed *Successful Futures'* focus on the lack of fitness for purpose of the school accountability regime, as well as its call for a revised curriculum framework to be developed by, and for, the teaching profession in the context of a genuinely collaborative professional culture. The Union also acknowledged positively Professor Donaldson's call for the Welsh Government to take account of the capacity of the system to deliver reform and for it to develop a comprehensive and

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<sup>1</sup> NASUWT (2013). *Maintaining world class schools*. NASUWT; Birmingham.

credible strategic implementation plan, reflecting the inherent complexities associated with any substantial curriculum reform process.

8. It is worth noting in this context that *Successful Futures* secured a broad political, public and professional consensus in support of the direction of travel for the curriculum it identified.
9. The NASUWT regrets that these critical recommendations have been noticeably absent from the approach to the development of the new curriculum adopted by the Welsh Government to date. The Union's concerns in this respect were set out in its evidence to the National Assembly for Wales Children, Young People and Education Committee's Inquiry into these matters.<sup>2</sup> In summary, the Union was concerned that:
  - the generality of the teaching profession had been excluded from the development of the curriculum;
  - in Pioneer Schools, in which the majority of curriculum development activities had been located, work had been characterised by lack of engagement with staff beyond small, limited groups;
  - the links between existing subject disciplines, which form the basis of the qualification system, and the proposed structure of the curriculum had not been established with adequate clarity;
  - insufficient connections had been drawn between pedagogy and the curriculum;
  - workload and manageability issues, as well as factors related to the contractual terms and conditions of teachers and headteachers, were not taken into account in the design of the curriculum and its associated assessment frameworks; and
  - there had been a failure at the outset of development work to recognise the relationship between the demands of the new

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<sup>2</sup> Children, Young People and Education Committee (2018). *Welsh Government's progress in developing the new Curriculum for Wales; Response from the NASUWT*. (CR 7). Available at: (<http://senedd.assembly.wales/documents/s82208/CR%2007%20The%20National%20Association%20of%20Schoolmasters%20Union%20of%20Women%20Teachers%20NASUWT.pdf>), accessed on 28.06.19.

curriculum and the consequent training and development needs of the workforce.

10. It is evident from the materials published to date that these concerns, all of which relate to matters referenced explicitly in *Successful Futures*, remain substantially unaddressed. It is also clear from the consultation documentation that not enough attention is being paid to the workload associated with implementing the proposals, particularly during the transition phase.
11. Professor Donaldson was clear that his report did not represent a detailed curriculum or a plan for its implementation. *Successful Futures*, rightly, identified these matters as tasks for the Welsh Government to take forward in partnership with key stakeholders, including teachers, school leaders and their trade unions.
12. The Welsh Government's failure to reflect the principles set out in *Successful Futures* in its development work has resulted in circumstances where serious concerns have arisen about the content of the curriculum and the implications that would follow from its implementation. Consequently, further work to develop the curriculum should not be progressed until an effective implementation plan has been produced and steps have been taken to remediate those issues of most substantial and immediate concern. The basis on which the NASUWT has reached this conclusion and the action required to establish more suitable conditions for further curriculum development work are set out in further detail below.

### **Implementation matters**

13. *Successful Futures* emphasised that there should be a clear timescale for the implementation of the new curriculum. The changes proposed by the Welsh Government, regardless of their merits or otherwise, are significant in scope. They would, if implemented, have deliberate and far-reaching implications for the ways in which schools organise their educational

provision, the allocation of human and financial resources across the education system and the work of teachers and school leaders.

14. Schools would require significant additional support from external agencies, including local authorities and regional consortia, to take forward the proposed reforms in a manageable and sustainable way. This support would need to include substantial additional resourcing and the provision of tailored professional training and development for serving teachers, as well as reforms to Initial Teacher Education programmes.
15. *Successful Futures* observed with some justification that previous approaches to curriculum reform in Wales had been characterised by insufficient attention by policymakers to the complexities of implementation. However, notwithstanding these concerns, implementation of previous reforms to the curriculum was, to some extent, supported by a strategy that facilitated preparation by schools and other relevant bodies. The actions of the Welsh Government in this instance of reform fall well short of even this relatively low standard.
16. It defies credible explanation that, to date, the Welsh Government has set hard implementation deadlines for the introduction of its proposed curriculum with no apparent consideration of the steps that would need to be taken to ensure that these deadlines are met. It is important to recognise that the failure of the Welsh Government to set out any form of strategic implementation plan has served only to undermine professional trust and confidence in the reform process. As *Successful Futures* observed, without purposeful efforts to secure and sustain the trust of teachers and headteachers, as well as that of parents and other stakeholders, in the reform process, its prospects of impacting positively on the quality of educational provision are limited.
17. The absence of a clear strategy setting out the responsibilities of those involved in the delivery of the new curriculum, and how support should be provided to ensure that these responsibilities are discharged effectively, means that there is now a clear risk that implementation of the curriculum

in its current form would result in considerable turbulence and disruption in schools. The adverse implications for educational provision and for the working conditions of teachers and headteachers in such circumstances would be significant.

### **Implications for teachers and school leaders of curriculum reform**

18. It is essential that curriculum reform is progressed on the basis of a clear understanding of the centrality of the school workforce to its implementation and its ability to secure tangible and worthwhile educational benefits for learners.
19. As noted above, the importance of the engagement of the workforce in the development of the curriculum was emphasised strongly in *Successful Futures*. Such an approach not only secures the sense of professional ownership required to deliver reform effectively but also ensures that the curriculum policy reflects the views and legitimate interests of the workforce as well as the realities of life in the classroom.
20. The NASUWT notes that development of the curriculum and associated resources by Pioneer Schools is characterised in the consultation document as one of 'co-construction', in which partners, including the workforce and their representatives, have collaborated to ensure that the distinct perspectives of all stakeholders are taken into effective account. However, in practice and as noted above, the Pioneer School-led approach has not involved any process that could be described credibly as 'co-construction'. In many Pioneer Schools, 'co-construction' is, in effect, being undertaken by a small select group of staff, usually at a senior level, and external education 'experts'. In many cases, the majority of other staff in these schools are not involved, not engaged and have had little involvement in any of the curriculum-related activities being undertaken in the settings in which they work. Staff working outside Pioneer Schools have had even less involvement and remain unaware of any of the key features of the proposed reforms and the challenges associated with it.

21. The NASUWT further notes that in Pioneer Schools decisions to change the curriculum have been made by senior staff and those directly involved in designing the new curriculum, with little consideration given to the views of the majority of teachers.
22. At a national level, the key body with responsibility for the engagement of partners, including trade unions, in the development of the new curriculum, the Strategic Stakeholder Group, appears to have been excluded from any effective involvement in the development process.
23. Many of the matters the NASUWT has identified to date in relation to the development of the curriculum refer directly to this marginalisation of the voice of the workforce.
24. Particular concerns in this respect relate to the workload risks associated with the implementation of the new curriculum. The NASUWT's prior experience of curriculum reform in Wales and elsewhere highlights the extent and nature of these risks. It is critical that those responsible for the development and implementation of reform identify potential workload impacts at the outset of the policy development process and keep these matters under review as this process continues.
25. It is evident that no such action has been taken by the Welsh Government and that these issues were not considered meaningfully by Pioneer Schools in the course of their development work. It is, therefore, entirely unacceptable that the Welsh Government intends to implement radical changes to the curriculum framework without undertaking a meaningful workload audit. This audit would need to consider the additional tasks and functions that teachers and school leaders would need to undertake to implement and make use of the curriculum and how time and capacity would be allocated to this purpose to ensure that teachers and school leaders are not subject to increases in their overall workload burdens.
26. It should be noted in this context that the teacher and school leader workforce is confronted currently by a profound workload crisis. The

Education Workforce Council's 2017 National Workforce Survey found that:

- 78.1% of teachers reported that workload was the least rewarding aspect of their professional role;
- 88.3% of teachers felt that their workload patterns were unmanageable; and
- the average working week for a full-time teacher in the period covered by the survey was 50.7 hours.

27. As part of the implementation strategy advocated above, it is critical that the Welsh Government undertakes a comprehensive review of the workload risks associated with curriculum reform so that the actions necessary to address these risks can be identified and taken.

28. As confirmed by its 2019 Annual Conference, the NASUWT is clear that it will take all legitimate steps, up to and including industrial action, to protect its members from any deterioration in their working conditions arising from curriculum reform.

29. Steps to address these risks and issues should be integrated into the curriculum development plan by means of a comprehensive workload impact assessments developed in consultation with the NASUWT.

30. The implications of curriculum reform for the pay and conditions of service of teachers are also critical considerations in this respect. It is essential that reform is taken forward in a way that makes effective use of the skills, talents and expertise of the existing workforce. The NASUWT is concerned that the approach to curriculum reform adopted by the Welsh Government has failed to meet this fundamental expectation. Specifically, the Welsh Government has not made clear how subject specialist teachers in the secondary sector would be able to make use of their professional knowledge and understanding in the context of the new curriculum. This omission must be addressed as a matter of urgency as some schools and local authorities may perceive incentives to reduce costs inappropriately

by cutting staffing levels, resulting in redundancies and a reduction in the number of subject leadership posts in the system.

31. Moreover, in its submission to the Children, Young People and Education Committee, the NASUWT noted that some schools have sought to anticipate the outcomes of the curriculum review process by removing Teaching and Learning Responsibility (TLR) payments from staffing structures on the assumption that requirements for such posts will decline following implementation of the new curriculum. The Union is clear that this trend has continued since its evidence to the Committee was submitted. Consequently, there is a growing evidence that employers will seek to use the process of curriculum reform as a pretext for undermining the terms and conditions of the teaching workforce, reducing teachers' scope for career and pay progression and for bearing down on staffing costs. It is difficult to envisage how the confidence of teachers and school leaders in the new curriculum would not be further undermined if such risks remain.
32. The issues highlighted above are a direct consequence of the failure of the Welsh Government to underpin the process of curriculum reform with a credible and coherent workforce strategy. It is critical that such a strategy is developed and implemented without delay and in full consultation with the NASUWT and other relevant stakeholders.
33. The NASUWT will continue to defend its members against any attempts to undermine their terms and conditions of employment as a result of the process of curriculum reform, including, where appropriate and necessary, through the use of lawful industrial action.
34. If implemented, the proposed curriculum framework would require the provision of a high-quality professional development and training offer for teachers and school leaders. It is noted that this requirement was emphasised strongly in *Successful Futures*. Professor Donaldson recognised that the Welsh Government's New Deal for the Education Workforce and the outcomes of the review of Initial Teacher Education

undertaken by Professor John Furlong would be important in this respect. However, *Successful Futures* was clear that ‘more immediate action’ would be required to ‘build the confidence and capacity of teachers and school leaders in taking forward the review’s recommendations’.

35. The response of the Welsh Government to this critical element of the reform process has, to date, fallen far short of legitimate expectations. In particular, the Union notes the emphasis placed by the Welsh Government on its proposals for National Professional Learning Days and the £24 million to be allocated to the National Approach to Professional Learning (NAPL) in supporting the implementation of the new curriculum. While the NASUWT recognises that these initiatives might make some contribution to addressing professional development needs, it is by no means clear that they will be sufficient to reach the levels of support for teachers and headteachers advocated in *Successful Futures*.
36. It is, therefore, difficult to envisage how the significant range of curriculum reforms proposed by the Welsh Government could be taken forward without a clear strategy for professional development and training. Such a strategy must be developed as a matter of urgency.

### **Funding and resources**

37. Implementation of the new curriculum would have far-reaching resource implications at school, local and national levels.
38. The NASUWT has continued to emphasise that there is a pressing need for additional investment in the education system to address longstanding resource constraints. In such a resource constrained context, there is an evident risk that any failure to address the additional resourcing demands associated with curriculum reform could lead to its ineffective and incomplete implementation or draw scarce resources away from other critical areas.

39. The adverse impact of inadequately resourced reform on learners, teachers and the wider school workforce would be significant. The failure of the Welsh Government to undertake a funding and resources needs assessment represents a serious omission that may have significant practical consequences and further undermine public and professional confidence in the reform process.
40. It is, therefore, essential that an assessment of the resource implications of curriculum reform is undertaken without further delay. This assessment must be conducted in consultation with the NASUWT and other relevant stakeholders and be underpinned by a commitment from the Welsh Government to make available any additional resources that are identified as necessary.

### **General qualifications**

41. *Successful Futures* anticipated correctly that any review of the national curriculum framework would, of necessity, have significant implications for the qualifications offered to learners in the post-14 phase. Alignment of the curriculum framework with the qualifications taken by the significant majority of learners at the end of current Key Stages 4 and 5 is an essential contributor to coherence across the education system.
42. However, the NASUWT is not aware that any meaningful consideration has yet been given to this critical issue by the Welsh Government or Qualifications Wales.
43. The NASUWT notes that during the recent process of curriculum reform in England, insufficient time was allocated to planning and implementing consequent changes to general qualifications. As a result, its qualification system faced substantial challenges that placed the functionality and sustainability of this system at serious risk. A similar risk may arise in Wales due to a lack of effective planning.

44. Consideration of general qualifications issues should include consideration of the portability of qualifications across the UK to ensure that they have currency with employers and education providers beyond as well as within Wales.
45. It is essential that parents, pupils, teachers, headteachers and the wider school workforce can have confidence that the consequences for qualifications of any curriculum reform will be assessed and addressed promptly. The Welsh Government should work with the NASUWT and other relevant stakeholders to take forward work to this end.

## **SPECIFIC COMMENTS**

### **Draft Curriculum for Wales guidance**

46. The NASUWT's observations in this specific context relate to the draft statutory guidance published by the Welsh Government, *A guide to the Curriculum for Wales 2022*. Comments on other documents released by the Welsh Government as part of the consultation exercise are set out elsewhere in this response.
47. The NASUWT recognises that it is important that curricular frameworks are guided by an overarching set of aims, values and purposes. It is, therefore, appropriate that the fundamental principles and objectives of the curriculum and how they should be given practical effect are articulated in a single guidance document. □
48. However, as this submission has made clear, the NASUWT has profound concerns about the Welsh Government's proposals for curriculum reform. These shortcomings are reflected in the draft guidance document, particularly in terms of the critical issues it leaves unaddressed. Given the inadequate nature of implementation planning to date, it is evident that the Welsh Government is not yet in a position to develop meaningful overarching guidance that addresses vital strategic issues. Completion of such planning would permit the Welsh Government to work with the

NASUWT and other relevant stakeholders to develop appropriate guidance and advice.

49. Once meaningful strategic planning has been completed, the Welsh Government will need to work with the NASUWT and other relevant stakeholders to develop suitably comprehensive guidance on these matters.

#### **‘What matters’ statements**

50. The NASUWT notes that guidance for each Area of Learning and Experience (AoLE) is organised around a collection of ‘what matters’ statements. The Union has no objection in principle to this approach, given that it seeks to capture the essence of fundamental learning concepts, ensuring that the detail of each learning area is underpinned by a coherent rationale. As *Successful Futures* noted, statements of aims and purposes are widely used as a starting point for curriculum specifications in many countries, but that in Wales, the aims and purposes of the current curriculum are not widely understood across the education system.
51. However, given that a fundamental principle of curriculum reform is that it should be taken forward in a way that engages the wider teaching profession, the failure to give practical effect to this principle has had profound consequences for the draft curriculum’s aims, values and purposes. In light of the failure to involve the profession meaningfully in the development of the curriculum, it is by no means clear that they will command the confidence of teachers or reflect their key concerns. It should be noted that publishing statements in a finalised form and seeking views of teachers and headteachers through a public consultation is an entirely inadequate substitute for the process of co-creation envisaged in *Successful Futures*.
52. The NASUWT is, therefore, clear that the statements should not be used as a basis for further curriculum development until the Welsh Government has established a process that will secure the views and perspectives of

the teaching profession more securely. The Welsh Government should work with the NASUWT and other relevant stakeholders to establish and take forward such a process.

### **Assessment proposals**

53. The NASUWT notes that implementation of the proposed curriculum would involve significant changes to current assessment arrangements, both for statutory purposes and in respect of schools' internal assessment policy and practice.
54. Of particular importance in this context is the removal of levels from the current curriculum framework. The NASUWT remains clear that levels have significant limitations and welcomes the recommendation set out in *Successful Futures* that they should be removed.
55. It is evident that levels have become a firmly embedded feature of schools' assessment practice for two fundamental reasons. First, concern about the outcomes of statutory pupil assessment in the context of the current high-stakes school accountability regime has driven internal assessment practice across schools to an inappropriately substantial extent. Schools perceive significant pressures to track the progress of pupils towards expected levels of attainment at the end of Key Stages and, consequently, use the framework of levels to determine their internal formative and summative assessment practices.
56. Second, using levels in internal assessment allowed schools to use the same assessment terminology as those external bodies, such as Estyn and local authorities, to which they were accountable, notwithstanding the effectiveness or otherwise of levels as a means of evaluating the progress and achievement of pupils.
57. However, the use of levels for these purposes encouraged practices in schools that added significantly to teachers' workload burdens and were of questionable educational value. Specifically, the use of levels has resulted in approaches in schools where level descriptions have a disproportionate

emphasis in the structure and content of their curricula. Much of this pressure has been driven by the perceived imperatives of the school accountability regime and has resulted in circumstances where pupils' learning experiences are too often assessment-led rather than shaped by the content of the curriculum.

58. Levels have also been used in pupil tracking systems in many schools, in which the priority has been to generate data to indicate whether pupils between two statutory national assessment points are on track to meet the performance outcomes expected of them. As a result, teachers are required to undertake excessive amounts of summative assessment to generate data for this purpose, with assessment practice driven by the requirements of such tracking systems rather than the professional judgements of teachers about the learning needs of pupils.
59. These models of assessment rest on the false assumption that pupil progress is linear in nature and that 'on-trackness' is, therefore, measurable validly and reliably through over-frequent use of summative assessment.
60. It should be noted that excessive use of summative assessment has also been strongly associated with the use of crude people performance data targets as performance management objectives for teachers. Such systems, as the recent Department for Education (DfE)-commissioned report, *Making data work*, confirms, are not only inequitable and unreliable but also fail to take effective account of their negative implications for the wellbeing and morale of teachers and school leaders.<sup>3</sup>
61. It is, therefore, clear that the reform of the curriculum creates an important opportunity to address these concerns. However, the NASUWT is concerned that the proposals set out by the Welsh Government would fail to take full advantage of this opportunity.

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<sup>3</sup> Teacher Workload Review Group (2018). *Making data work*. Available at ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/754349/Workload\\_Advisory\\_Group-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/754349/Workload_Advisory_Group-report.pdf)), accessed on 30.06.19.

62. Of particular concern in this respect is the way in which the proposed progression steps might operate in practice. It is noted that the Welsh Government envisages a movement away from the assessment approach associated with levels, in which assessments are undertaken on a best-fit basis by allocating a level to individual pupil attainment based on which level descriptor most closely matches the pupil's performance. The draft assessment guidance confirms that this model will be replaced with graduated progression steps which relate broadly to 'expectations' at ages 5, 8, 11, 14 and 16. The guidance further states that these progression steps will be accompanied by achievement outcomes that will define these broad expectations of learning over a three-year period.
63. In effect, this approach represents a secure-fit model, in which a progression step will not be achieved until all the relevant achievement outcomes have been demonstrably secured.
64. However, there is an evident risk that without clear additional guidance from the Welsh Government, schools may seek to break down achievement outcomes into sub-outcomes to track progress in a more granular way between progression steps. It is noted that such practices have become prevalent across England following the removal of levels from its National Curriculum, driven by a concern to monitor the progress of pupils between statutory summative assessment checkpoints. There is a distinct danger that such practices, which represent little more than the re-creation of National Curriculum levels in a different guise, will be replicated in Wales.
65. In such circumstances, teachers would be required to assess pupils and provide accompanying evidence against each achievement outcome, notwithstanding any additional sub-outcomes that schools may choose to impose. Based on the illustrative outcomes set out in the consultation document, teachers would be required to undertake a substantial number of assessments in order to determine whether or not pupils have reached a progression step. Given the number of achievement outcomes across all of the AoLEs, it is difficult to envisage how assessment undertaken on this

basis would be manageable or reflect the principles of assessment set out in *Successful Futures*.

66. A distortion of this nature of the Welsh Government's stated aims for assessment process would be facilitated by its proposal to give responsibility for the determination achievement outcomes to individual headteachers. This proposal is highly inappropriate. A national curriculum is best understood as representing a common educational entitlement for all learners, regardless of where they happen to live or the school they happen to attend. A key element of an effective national curriculum is that assessment is undertaken within a coherent and clear framework. It is, therefore, not possible for this objective to be secured in practice if, as the Welsh Government intends, each school, by means of an executive decision of its headteacher, can determine its own achievement outcomes.
67. The NASUWT notes the emphasis in the draft assessment guidance on the critical importance of formative assessment. The Union is clear that effective formative assessment helps pupils understand what they have achieved and what they need to do to improve further. For teachers, formative assessment supports their ability to sustain an ongoing understanding of pupils' progress and current attainment.
68. It is apparent from experience in Wales and elsewhere, that an overemphasis on summative assessment crowds out space for high-quality formative assessment. The approach advocated by the Welsh Government could exacerbate rather than address current issues in this respect, given its strong emphasis on the role of achievement outcomes in schools' assessment policy and practice.
69. The NASUWT welcomes the proposal to accompany an amended curriculum with statutory guidance on the role of formative assessment. This guidance should confirm that data and information generated from formative assessment should be used for teachers' own planning purposes and to inform professional dialogue. The guidance should, therefore, make clear that teachers should not be subject to an obligation

to submit their formative assessment outcomes to scrutiny and monitoring, given the workload consequences of such practices and their adverse impact on supporting teachers to make use of assessment methodologies that provide meaningful support for learners.

70. The draft assessment guidance states that moderation will be central to the assessment arrangements associated with the proposed revised curriculum. The NASUWT does not dispute that it is essential that teachers can develop a common understanding of descriptions of learner progression and achievement within their own schools and beyond, in order to secure system-wide assessment consistency.
71. However, experience of moderation in Wales has been highly problematic. In particular, because of the high-stakes accountability context within which teacher assessment is located, teachers have been subjected to onerous and burdensome requirements to collect, collate and annotate pupils' work, including through the maintenance of substantial portfolios of such work, in order to justify their assessments of pupils' attainment. While these practices create significant additional workload burdens for teachers, there is no evidence that they support the learning of pupils in any meaningful way.
72. It will, therefore, be essential for the Welsh Government to work with the NASUWT and other relevant stakeholders in the context of a revised curriculum to develop systems and structures for moderation that avoid these adverse outcomes. In particular, arrangements must ensure that time is created within existing provision for contractual directed time to permit moderation and that teachers are supported through the provision of effective external support and exemplification materials.
73. The draft guidance rightly highlights the importance of effective arrangements for reporting to parents. This reporting should be set within the context of pupils' curricular experiences in a way that is meaningful and accessible. The Welsh Government's proposals would, if implemented, represent a significant change in the structure and content

of the curriculum. It would be essential, therefore, for the Welsh Government to provide information and advice to parents on the nature and implications of any changes to the curriculum to support parents' engagement with their children's learning and with teachers in the schools that their children attend.

74. It is welcome that the draft guidance confirms that current arrangements in respect of the frequency of reporting will not change. However, the NASUWT notes with concern the ambiguity and potential for abuse arising from the statement in the document that reporting to parents should be an 'ongoing process'. It is right that parents are supported to understand their children's educational progress and achievement, and are, in turn, helped where necessary to meet their responsibilities for their children's education. However, it is also important that the Welsh Government does not implement arrangements that are unmanageable and distract teachers and headteachers from other tasks and activities related to their core responsibilities for teaching and leading teaching and learning.

### **Breadth, balance and cross-curricular issues**

75. The NASUWT recognises that the proposals set out in all the draft AoLEs seek to secure curricular breadth and balance through the inclusion of a wide range of skills- and knowledge-related learning experiences. □
76. However, the Union is concerned that little attention appears to have been given to how all the elements of the proposed curriculum might be delivered within the boundaries of the current school year. As part of the development of the implementation plan advocated in this response, it will be essential to ensure that further consideration is given to this critical dimension of school-level curriculum management and a clear recognition of that curriculum reform will not signal a move to increase the length of the school day or the school year.
77. *Successful Futures* emphasised the importance of a broad and balanced curriculum experience for all learners, noting that while provisions in this

respect are reflected in the Education Act 2002, they have failed to secure this objective in practice for all learners.

78. Notwithstanding the extent to which implementation of the draft AoLEs would secure a genuinely broad and balanced curriculum in all circumstances, it is important to note that many of the drivers of curriculum narrowing highlighted in Professor Donaldson's report have not been addressed by the Welsh Government. In such circumstances, regardless of the content of the curriculum, risks to the breadth and balance of the curriculum experienced by pupils in practice will remain. In particular, systems of school accountability continue to privilege certain areas of learning over others. While the NASUWT would not dispute the foundational nature of learning in literacy, numeracy and digital skills, it is clear that these areas are given disproportionate emphasis in many schools' learning offers to the detriment of genuine curricular breadth and balance.
79. The impact of the school accountability regime in this respect was acknowledged in *Successful Futures*, which called for fundamental reform of the school accountability framework in Wales. Specifically, Professor Donaldson's report called for a move away from school-level, high-stakes accountability to an approach based to a greater extent on system level performance.
80. The NASUWT has long called for reforms to accountability frameworks on this basis, including steps to hold key national policymakers to account for the impact of their activities on the educational wellbeing and future life chances of children and young people.
81. It is, therefore, difficult to fully assess the degree to which the Welsh Government's proposed curriculum reform would promote meaningful breadth and balance without a clear indication of its intentions with regard to Professor Donaldson's recommendations on the school accountability regime, including the approach to inspection that Estyn may be directed to adopt in future.

82. The NASUWT notes that the Welsh Government has set out some initial considerations on the implications of curriculum reform for official systems of school accountability.<sup>4</sup> Although little detail has yet been published on this critical issue, it appears that the Welsh Government intends to give much greater emphasis to school self-evaluation in future accountability frameworks. The NASUWT's experience in Wales and elsewhere has been that the location of self-evaluation within a high-stakes school accountability framework results in practices at school level that are workload intensive and highly bureaucratic as a result of a perceived requirement in schools to provide extensive evidence to support schools' stated descriptions of their performance.
83. In addition, the Welsh Government has stated that internal self-evaluation will be subject to several layers of authentication. From the perspective of teachers, this would mean oversight of their work by school leaders, local authorities, regional consortia and Estyn. In such a high-stakes context, there is an evident risk that evaluation of the performance of teachers would involve measuring the outcomes of teacher assessment against headteacher-set achievement outcomes at each progression step. It is difficult to reconcile such an approach with the insistence in *Successful Futures* that reforms should seek to enhance professional discretion over teaching and learning and address the implications for practice in classrooms of the current high-stakes accountability regime.
84. It is also clear that the emphasis on some areas of the curriculum over others in many schools originates from the perceived requirements of the National Literacy and Numeracy Framework (NLNF). While the Union notes that the NLNF is referenced in the consultation document, it is not entirely clear how the relevant AoLEs cohere with its requirements. Given the importance attached to the Framework across the education system, provision would likely be guided to a significant extent by these perceived requirements, regardless of the content specified in the AoLEs. Such

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<sup>4</sup> Welsh Government (2019). *Draft evaluation and improvement (accountability) arrangements for Wales*. Available at (<https://gov.wales/sites/default/files/publications/2019-02/draft-evaluation-and-improvement-accountability-arrangements-for-wales.pdf>), accessed on 08.07.19.

circumstances would undermine the primacy of the national curriculum framework and its role in establishing common learning entitlements. It is, therefore, essential that if the NLNF is to be retained under a new curriculum, its coherence with that curriculum is subject to robust evaluation.

85. While accountability-related pressures on curricular breadth and balance are important features of the education system, it is also critical to acknowledge that schools have a significant degree of autonomy over the choices they make about the nature and content of the learning experiences that pupils receive. While accountability pressures apply consistently across the system currently, variation in the nature of pupils' experiences underlines that how schools respond to these pressures is a critical consideration.
86. *Successful Futures* made clear that while schools should have flexibility to tailor their curriculum to meet their particular needs and circumstances, it is important that this discretion does not allow schools to choose to offer an unduly narrow curriculum.
87. To the extent that school-level accountability is retained in a reformed curriculum framework, its focus at this level should centre on ensuring that the level of breadth and balance in pupils' learning experiences envisaged in *Successful Futures* is secured in practice.
88. As observed elsewhere in this response, curriculum narrowing is strongly associated with learning programmes of study that are assessment-led rather than curriculum-led. The NASUWT notes in this context that while some of the 'What Matters' statements set out in the draft guidance may reflect ambitions for children and young people that many teachers, school leaders and other stakeholders might share, the progressive nature of the draft curriculum is reflected principally in the achievement outcomes associated with each progression step. Without further guidance on how curriculum content can be structured to support progression through possible phases, there would be a significant risk that schools may seek to

make sense of the curriculum by reference to achievement outcomes. This risk would be exacerbated by the implementation of the Welsh Government's proposal, noted elsewhere in this response, in which headteachers would have the discretion to set aside, embellish or amend any of the illustrative outcomes set out in the draft guidance.

89. The NASUWT notes the emphasis placed in *Successful Futures* on the development of cross-curricular themes and understandings in any effective curricular framework. The Union recognises that essential aspects of learning can transcend strict subject boundaries and that subject content in a specific area can be relevant to pupils' learning in others.□
90. However, *Successful Futures* recognised correctly that previous approaches to the implementation of cross-curricular learning have been unwieldy and have often been somewhat artificial in character, focused on demonstrating to external audiences that cross-curricular learning is taking place, rather than on making a meaningful impact on the quality of pupils' learning experiences. Teachers have also reported that many of the approaches adopted to advance the implementation of cross-cutting themes have distracted focus from study requirements in discrete areas of the curriculum. In the secondary sector, in particular, securing cross-curricular approaches has resulted in the imposition of burdens on teachers that have often served as profound distractions on their ability to focus on the needs of learners.□
91. However, although the revised curriculum guidance published by the Welsh Government identifies cross-cutting curriculum dimensions, it fails to address the concerns associated with current approaches to this aspect of provision. Implementation of the curriculum in its current form, therefore, risks replicating these shortcomings, especially in circumstances where it is not clear how curricular time should be allocated to ensure consistent coverage of all curricular requirements.
92. These matters should be addressed in the development of an overarching Curriculum for Wales implementation strategy. This strategy should

include the development of approaches to support genuinely collaborative approaches to curriculum development with and between schools in ways that do not add to the workload burdens of teachers and school leaders. The need to create space for collaboration will require consideration to be given the adequacy of staffing complements in schools. This strategy should also recognise that cross-curricular learning in a secondary context will need to be led by collaboration between subject specialist teachers in order to be effective.

93. A key test of any fit-for-purpose curriculum is the extent to which it supports the work of schools to challenge discrimination and prejudice and advance equality and diversity. These considerations should permeate the whole curriculum. It is, therefore, extremely disappointing that in a curriculum designed explicitly with the intention of drawing links between different aspects of learning, matters related to equality and diversity are brigaded largely into the Health and Wellbeing AoLE and are almost absent elsewhere in the documentation, including the draft statutory guidance.□
94. Schools, local authorities, the Welsh Government and all relevant public bodies in Wales are subject to the Public Sector Equality Duty, which requires active steps to be taken to advance equality and prevent discrimination. The fact that such little consideration appears to have been given to this critical legal obligation is entirely unsatisfactory and falls far short of the standards expected under the Duty, particularly given that the Duty requires equality considerations to be addressed at the outset of the policy development process.
95. The Welsh Government also has a responsibility to consider how the Strategic Development Goals (SDGs), in particular SDG 4.7 which relates to sustainability and global learning, will be integrated into the curriculum. The Welsh Government has a stated commitment to taking forward SDG implementation and the reforms to curriculum it proposes provide a clear opportunity to set out ways in which this could and should happen.

96. Consequently, urgent action is required as part of the development of a strategic plan for the implementation of curriculum reform to address the Welsh Government's failure to date to address this critical consideration.

### **Allowing teachers to make use of their professional discretion**

97. As noted above, the NASUWT is clear that fit-for-purpose curriculum frameworks ensure that teachers can make effective use of their professional skills, knowledge and expertise to meet the needs of learners.□

98. The approach envisaged in *Successful Futures* is based on the notion that reducing the degree of prescription in the curriculum will, in and of itself, give teachers greater scope to shape pupils' learning experiences.

99. While overly prescriptive curriculum requirements are unquestionably inimical to this objective, the NASUWT's experience confirms that there are other important drivers of circumscribed professional discretion. It is important, in particular, to realise that reducing the level of prescription in the curriculum will not necessarily secure greater scope for teachers to make use of their professional judgement, as the way in which they undertake their work is, in practice, under the day-to-day scrutiny and oversight of headteachers and other senior staff.□

100. The NASUWT is aware of many arrangements in schools where leaders work to ensure that teachers can make appropriate use of their professional autonomy, set within the context of their schools' strategic development objectives and how the work of individual teachers contributes to the achievement of these objectives.

101. However, it is evident that such an approach is not adopted in all circumstances. Although it may be that reductions in curriculum prescription might lead to greater exercise of professional autonomy in some instances, the Welsh Government's proposed curriculum would not

prevent schools from continuing to impose unreasonable restrictions on the use of professional discretion.□

102. For this reason, the consideration of the workforce implications of curriculum reform advocated in this response should seek to establish clear, system-wide expectations about the balance of teacher discretion and managerial oversight required to give practical effect to recommendations on professional autonomy set out in *Successful Futures*.

### **Specialisation from age 14 in particular subjects**

103. *Successful Futures* notes that from about the age of 14 onwards, young people begin to specialise and make choices about their future learning experiences. Inherent in this assumption is that these learning pathways will not include all elements of the curriculum that these young people have studied previously. In any system where pupils can make choices about their learning experiences post 14, pupils will inevitably discontinue the study of some previously compulsory elements. The NASUWT notes that such circumstances pertain currently in respect of the role of the national curriculum framework in post-14 programmes of learning.
104. However, it is essential that these programmes build coherently from learners' prior experiences. Currently, general qualification specifications progress directly from the relevant elements of the existing curriculum framework. As noted elsewhere in this submission, it is essential to ensure that the qualification development strategy with which any coherent curriculum reform plan must be associated takes this critical consideration into full account.
105. The degree to which post-14 choice is meaningful depends upon the balance struck between mandatory and elected elements in post-14 study programmes. However, given the difficulty noted above in determining the curriculum load that will be associated with the Welsh Government's proposals in practice, it is not possible to express a considered view on the extent to which pupils at the end of Key Stage 3 will experience

meaningful choice about their future learning options. This matter should be integral to the development of the implementation strategy recommended by the NASUWT. Similar considerations will also, therefore, apply in respect of post-16 learning options as A-levels and other widely accessed qualifications build on learners' prior skills and knowledge.

106. It is important that this element of the implementation strategy is taken forward in full consultation with stakeholders, including the NASUWT. Consideration should also be given ways in which the effective engagement of employers can be secured in the development of post-14 learning pathways.



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