



8 March 2019

To whom it may concern,

As Wales' independent regulator, we have been supporting Welsh Government in its implementation of Education in Wales: Our National Mission. As part of that work, we engage regularly with Welsh Government officials and others across the education system on matters relating to future qualifications.

As outlined in our recent exchange of letters with the Minister for Education¹, we are already carefully considering how we can make sure that qualifications continue to meet the needs of 16-year-olds once the new curriculum is introduced. We are also working closely with Welsh Government and others to help shape future accountability arrangements, an area of national policy that directly affects our work. The reliance placed on qualification outcomes in future accountability arrangements will determine the degree of flexibility we have in the design of the new qualifications for the new curriculum.

We welcome Welsh Government's aim of reducing the disproportionate emphasis that existing accountability arrangements place on qualification outcomes, and the additional pressure these place on schools, teachers and students.

We look forward to continuing to contribute to the important work of ensuring that future accountability arrangements are as effective as possible.

¹ <https://qualificationswales.org/english/qualifications/qualification-reform/curriculum-reform/the-new-curriculum---correspondence-with-welsh-government/>

Qualifications Wales

Q2 Building, Pencarn Lane
Imperial Park,
Newport
NP10 8AR
☎ 0333 077 2701



www.qualificationswales.org

Cymwysterau Cymru

Adeilad Q2, Lôn Pencarn
Parc Imperial,
Casnewydd
NP10 8AR
☎ 0333 077 2701

Proposal to remove the requirement on schools to set measure-specific targets

We agree with the proposal that schools should not be required to set targets based on national performance measures for year 11 students. This change will reduce the pressure that accountability measures place on qualifications and the unintended impact of narrowing teaching and learning.

Proposal to increase the number of non-specified targets that schools must set

It is difficult to say whether there is a 'right' number of targets that schools must set for themselves – schools should be able to specify targets that are relevant to their context. The local authority, working with the school, plays an important role in ensuring that there is consistency and proportionality across the system. We are concerned, however, that targets based on qualification outcomes, whether set by the school or by the local authority, can lead to a narrowing in teaching practice.

Supporting the introduction of the proposals

Of more importance than the number of targets required, will be the focus and the range of measures that are set by schools. Schools are already required to set some non-specified targets, which means they have experience of doing so. However, putting in place support and guidance for schools could help them make the most of the additional flexibility offered by the proposals in the consultation.

While removing the measure-specific targets and replacing them with non-specified targets will give schools the choice to move away from narrow measures, it will not necessarily encourage them to do so. There is a risk that some schools may continue to rely on familiar measure-based targets rather than invest in a broader range of measures to support a better understanding of school quality and improvement. For example, if their results have historically been positive in relation to the measure-specific targets.

To help schools and local authorities make the most of the flexibility introduced in the proposals, we recommend Welsh Government should consider giving guidance on designing and setting appropriate targets.

Doing so could also help to support greater consistency in approach across schools and local authorities. Developing effective and reliable measures and targets is a technically challenging area with a high risk of unintended consequences. It is reasonable to expect that schools and local authorities will continue to set some targets based on qualification outcomes. It is important they are supported to make

appropriate use of performance results data, for example to make allowance for normal year-on-year statistical variation associated with relatively small sample sizes at a school level. For example, when looking at school level data at grades A*-C, we can see that it is not unusual in a statistical sense, for a school's results in a subject to fluctuate by up to 15 percentage points from one year to the next. This is because schools represent relatively small sample sizes - even in high take-up GCSE subjects such as Mathematics or English. It may be more meaningful for schools to consider, for example, trends in their results over several years, rather than solely focus on an increase or decrease in over two academic years.

In order to make judgements about the quality of a school, measures (including those on which targets are set) should be broader than just qualification or test outcomes. Qualitative information could usefully be used to help interpret changes in measures.

For example, guidance could suggest ideas on how to incorporate student voice on issues such as teaching and learning and feedback from a school's community, or ways to measure student and staff wellbeing. English-medium settings may also benefit from guidance on how to measure engagement with and use of the Welsh language. Over time, it may be useful to build a national bank of resources based on good practice of how schools can develop effective measures based on the rich range of quantitative and qualitative data sources available to them.

We know these types of considerations are already being looked at as part of the work supported by Estyn and the OECD to develop a self-evaluation toolkit for schools. We would welcome contributing to the development of guidance on measurement outcomes, either as part of our involvement with that project, or as part of our wider work with Welsh Government and others to consider future accountability arrangements.

Yours sincerely,



Ann Evans
Chair
Qualifications Wales



Philip Blaker
Chief Executive Officer
Qualifications Wales