

# Qualified for the future

## Analysis of consultation responses

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Presented to Qualifications Wales by Arad  
Research and NFER

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## Glossary

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Acronym / key word	Definition
ALN	Additional Learning Needs
AoLE	Area of Learning and Experience
BSL	British Sign Language
BTEC	Business and Technology Education Council
EOTAS	Education other than at school
GCSE	General Certificate of Secondary Education
KS2, KS3, KS4, KS5	Key stages 2, 3, 4 and 5
NEA	Non-examination assessment
STEM	Science, Technology, Engineering and Mathematics
Welsh Bacc	Welsh Baccalaureate

# 1. Introduction

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This is an analysis of the responses received to Qualifications Wales' public consultation, 'Qualified for the Future', which ran between 18 November 2019 and 7 February 2020. This was the first in a series of consultations that Qualifications Wales are running over the next two years. The proposals it made aim to underpin Qualifications Wales' work of reshaping qualifications to complement the new curriculum for Wales.<sup>1</sup>

Arad Research and NFER were commissioned to analyse and report on the responses to this consultation.

## 1.1 About the consultation

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In this consultation, Qualifications Wales sought views on key aspects of its approach to determining the qualifications that will be made available to 16-year-old learners to support the new curriculum for Wales. Qualifications Wales outlined its proposals:

- to establish a set of principles to shape the future provision of qualifications;
- for redesigned GCSEs to form a central part of the qualification offer for 16-year-old learners in Wales; and
- to include a specific qualification that supports the development and assessment of the wider skills defined in the new curriculum as part of the qualification offer.<sup>2</sup>

The full consultation document, 'Qualified for the future', and the associated Integrated Impact Assessment are [available online on Qualifications Wales' website](#).

Qualifications Wales promoted and circulated the consultation through a variety of channels in order to raise stakeholder awareness. In addition to conventional routes such as the Qualifications Wales website, newsletters, social media and via the regional education consortia, a number of additional engagement events were held across Wales. These included public drop-in events hosted at education establishments and a series of events for young people run on behalf of Qualifications Wales by Children in Wales.

The consultation and opportunities to respond were provided in a variety of formats: an online consultation, a young people's consultation and an easy read version. All versions included the same core consultation questions (worded in a way most appropriate to the intended audience). However, the young people's consultation and the easy read version did not include the Integrated Impact Assessment questions. Respondents could access the consultation online or electronically (PDF or Word) through the Qualifications Wales website, or by paper, large print and braille on request.

Qualifications Wales received **667 responses** to the consultation, comprising.

- 436 responses to the main consultation;
- 226 responses to the young people's consultation;
- 2 responses to the easy read version; and

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<sup>1</sup> Background information about [the new curriculum can be viewed online](#).

<sup>2</sup> The term 'integral skills' is now used within the new curriculum instead of 'wider skills'.

- 3 responses which followed a different structure to the consultation.

Not all respondents answered every consultation question. The 667 responses therefore include those who answered only a small number of questions, as well as those who answered most or all of the questions.

The table below provides a broad overview of the different types of respondent.

Broad category of respondent	Number of respondents
Education professionals ( <i>comprising both education professionals and those representing further or higher education institutions</i> )	313
Learners	264
Core education stakeholders ( <i>comprising local authorities, regional education consortia, awarding bodies, teaching unions, regulators and commissioners, and various other public bodies</i> ).	32
Wider education stakeholders ( <i>comprising parents or carers, elected members, employers or representative bodies, members of the public, various third sector organisations and those who preferred not to say</i> )	58
<b>Total respondents</b>	<b>667</b>

## 1.2 Approach to the analysis

All 667 responses received have been reviewed as part of the analysis. Responses not received via the online survey were included in the same way as those that were. Young people who participated in engagement events submitted responses to the consultation questions either online or in paper form, and these have also been included. Other engagement events did not constitute official consultation responses and were therefore not included in the analysis but provided useful context.

Arad and NFER undertook the analysis of all 667 responses on behalf of Qualifications Wales. The consultation included eight ‘**closed questions**’, requiring respondents to state the extent to which they agreed or disagreed with the proposals, or the impact they expect the proposals to have. These responses have been analysed and are presented in this report.

Arad and NFER then undertook a thematic analysis of the **responses to the 15 open-ended questions** (questions which allowed respondents to freely write comments). The thematic analysis categorised the information provided by respondents into overarching themes.

- Initially, a **sample of responses** to each question was reviewed and the research team worked collaboratively to develop an overarching framework for thematic analysis. This framework identified the key themes likely to be allocated within individual questions, as well as ensuring consistency in how similar themes were recorded across different questions. This framework was not fixed; it was flexible enough to be modified and developed further as the team undertook the full analysis of all consultation responses.

- To ensure consistency in the analysis, the initial sample of responses were reviewed independently by two different researchers. The researchers then came together to discuss their findings and agree the themes to include in the analysis framework and how these should be interpreted. This ensured that all researchers had developed a common understanding of how to interpret responses and a consistent approach to coding.
- The **remaining responses to open-ended questions** were analysed using the coding framework developed during the initial review stage. An evidence log (in the form of a spreadsheet) was used to attach key themes to each individual response. This evidence log ensured that all team members analysed and noted themes consistently and allowed the team to note the prevalence of each theme and variation in the views of different categories of respondent. A small number of key themes were identified for each question during this stage, but these themes were usually raised by a small number of respondents.

### 1.3 About this report

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Section 2 of this report presents an overview of key themes which arose regularly throughout responses to different consultation questions. These are high-level themes which reflect overarching issues raised by respondents.

The remainder of this report follows the structure of the consultation questions. The report deals with each question in turn and, as such, some themes may be repeated in responses to different questions. Where appropriate, the themes identified are divided into those raised by respondents who:

- Strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal. This includes any level of support expressed by those who partly agreed and partly disagreed, were unsure or did not answer the closed question.
- Strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal. This includes any level of concern expressed by those who partly agreed and partly disagreed, were unsure or did not answer the closed question.

The total number of responses to each closed question and each open-ended question varies substantially and is noted at the start of each question. On occasion, the percentages presented for the closed questions may not total exactly 100%, due to percentages being rounded up or down for presentational purposes.

The report presents key themes arising most often within the consultation responses. As the comments made by respondents were typically very wide-ranging, each theme was generally raised by a minority of respondents. The analysis ends with a brief commentary on any key differences in views between different respondent categories (while bearing in mind the differences in numbers of respondent in each category).

In the report, the term 'qualifications' is used to refer to those qualifications that are regulated by Qualifications Wales, are eligible for public funding, and are made available to learners at 16.

There was a wealth of further evidence provided through the consultation responses which supports these themes and provides significant additional detail. All individual responses have been shared with Qualifications Wales so they can be considered further.

**Throughout the report the themes and points presented are drawn from comments made by respondents and do not represent the views of the report authors or Qualifications Wales. The report therefore:**

- only provides a summary of the views raised by respondents themselves, not the views of Arad Research and NFER, or Qualifications Wales;
- provides a summary of views rather than drawing conclusions; and
- represents respondent views regardless of how accurately respondents have interpreted Qualifications Wales' proposals or whether their views accurately reflect the current qualifications landscape.

**This report is intended to provide a consolidation of the wide range of themes identified by respondents, presented as a variety of key messages for Qualifications Wales to consider. As such, the report does not present the numbers or proportions of respondents who raised each theme.**

## 2. Overarching themes

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The consultation asked respondents a series of specific questions about the proposals put forward by Qualifications Wales. Although the consultation questions focused on different topics, the analysis identified overarching and recurring themes which respondents raised across multiple questions. This initial section of the report presents an overview of the overarching themes raised frequently by respondents themselves through the consultation.

**Respondents commented that it is important to achieve an appropriate balance between qualifications that reflect the ethos of the new curriculum and qualifications that support a smooth progression into post-16 education.**

- On the one hand, respondents commented that qualifications should still ensure that learners are able to transition smoothly to subject-specific study at post-16 level, without a dilution of subject skills and knowledge. Similarly, assessment approaches adopted for learners at 16 should be sufficiently consistent with assessment approaches used in post-16 education.
- On the other hand, respondents noted that qualifications should relate to the content, structure and teaching approaches of the new curriculum (such as the areas of learning and experience (AoLEs) structure and the four purposes), thereby supporting the principles which underpin the development of the new curriculum. In addition, respondents commented that qualifications taken at 16 should complement the shift to assessment through progression steps and the way assessment is undertaken in earlier stages of education (though specific examples were not generally provided by respondents).

**They also felt that it is important that qualifications retain currency and comparability in Wales and beyond.** Respondents expressed the view that qualifications must remain sufficiently consistent with previous qualifications and qualifications outside Wales to ensure they are understood and valued by employers and further and higher education institutions. This was seen as particularly important for learners wishing to study or work outside Wales.

While some respondents emphasised that it is important for qualifications reform to complement and support the new curriculum in Wales, others cautioned that the education system is facing a period of significant change.

- On the one hand, respondents commented that **qualifications and the curriculum are intertwined, and reform must happen concurrently** to ensure the education system develops in a coherent and cohesive manner.
- On the other hand, they emphasised that **education professionals are already dealing with increased workloads.** Any qualifications reform must therefore be supported with sufficient training and resources to ensure education professionals are well-placed to respond. There was also a perception that the timing of qualifications reform must reflect these challenges; while any amendments must be in place at an appropriate point to avoid a misalignment with the new curriculum, education professionals also need sufficient time to familiarise themselves with any amendments to qualifications.

Respondents said that **qualifications could include a wider variety of assessment methods than currently used**, that are more in-line with the ethos of the new curriculum and better reflect the abilities of learners. Respondents supported the use of a range of non-examination assessment methods, alongside exams. For example, respondents said that there is scope to consider increasing the use of digital assessment and project-based coursework.

**The need to maintain an appropriate choice of qualifications for learners was also a key consideration for respondents.** They felt that a broad range of qualifications should be available that includes both vocational and academic subject areas, and emphasised the importance of ensuring that this range meets the needs of all learners across all settings. For example, respondents noted that appropriate qualifications should be available to meet the language needs and skills or interests of individual learners, as well as the needs of learners with Additional Learning Needs (ALN). To ensure such an appropriate range is achieved, respondents also emphasised the importance of making sure that the range of qualifications available are managed appropriately.

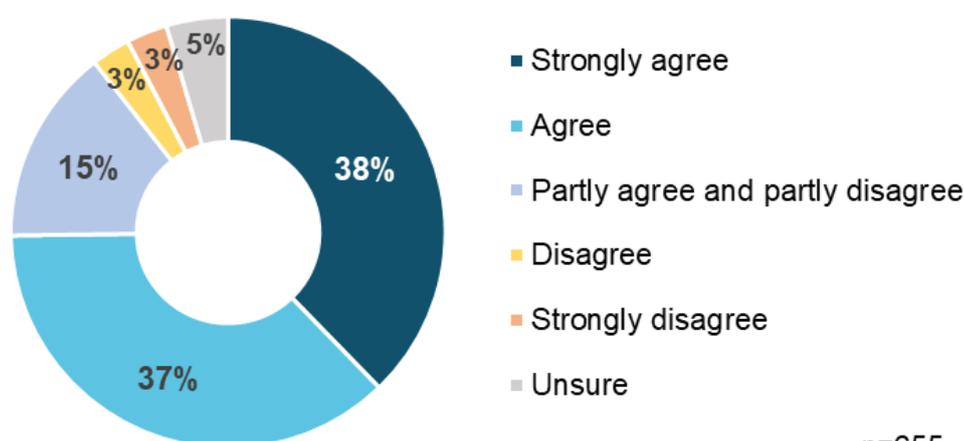
### 3. Principles to shape the future qualification offer

'Qualified for the future' outlined Qualifications Wales' proposals to establish a set of principles to shape how it will decide which qualifications taken at 16 are eligible for public funding. Respondents were asked to provide their views on these proposals.

#### 3.1 Principle 1: Qualifications that relate to, and support, the new curriculum for Wales

**Qualifications Wales should take steps to ensure that publicly funded qualifications taken at 16 relate to, and support, the new curriculum for Wales.**

To what extent do you agree with this proposal?



n=655

3

A total of 655 respondents answered this question and 75% agreed or strongly agreed with the proposal. A further 15% partly agreed and partly disagreed. A total of 364 provided written comments to support their answer (249 by those who agreed or strongly agreed; 70 by those who partly agreed and partly disagreed; 30 by those who disagreed or strongly disagreed; and 15 by those who were unsure or did not respond to the closed question).

##### 3.1.1 Support for this proposal

Among those who strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal, the themes raised most frequently were as follows.

**Respondents noted that qualifications and the curriculum should relate closely to one another to ensure a coherent and integrated education system. They saw limited value in qualifications which do not assess the actual knowledge and skills gained by learners.** Respondents noted that the purpose of qualifications should be to assess and evidence learner progress against what they have been taught. The education system would

<sup>3</sup> Percentages presented for this closed question do not total exactly 100% due to percentages being rounded up or down for presentational purposes.

be disjointed if qualifications were to assess learners on material unrelated to the curriculum. Respondents emphasised that qualifications should be relevant to what learners have studied. It was common for respondents to feel that this principle should 'obviously' be a key consideration for publicly funded qualifications.

**While ensuring qualifications relate to and support the new curriculum, respondents felt that there is an opportunity to consider how qualifications would prepare learners to progress to further or higher education and to future careers.** They felt that qualifications must be relevant to the requirements of post-16 education and careers, particularly in terms of supporting learners to make decisions about their future and ensuring they are equipped with the necessary skills for progression. This included making sure that qualifications meet requirements for different career paths and permitting a seamless transition to further and higher education. Respondents also emphasised that qualifications taken at 16 must support learners to progress to more subject-specific study at A-level and higher education level.

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*'Qualifications Wales should ensure that the new qualifications are relevant for students so that learners could use the skills and the knowledge obtained in said qualifications in their "next step", whether that includes university, apprenticeship, workplace or other options.'* [Learner]

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**Respondents felt that it is important that qualifications reflect the core principles which underpin the design of the new curriculum, including:**

- **the four purposes of the curriculum;**
- **the AoLEs structure;**
- **teaching practice;**
- **new approaches to assessment; and**
- **the focus on skills and conceptual knowledge within the new curriculum.**

Respondents identified that the new curriculum introduces a new structure and a new approach to teaching and learning. They felt that traditional qualifications would not necessarily reflect the ethos of the new of the curriculum and would need to be reformed to ensure they reaffirm and reflect the different way learners will be taught. For example, respondents noted that qualifications must reflect progression steps and the holistic learning and development identified in the four purposes of the curriculum.

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*'The idea of the new curriculum is to enable pupils to become more logical and independent problem solvers. The current GCSE system is based more on remembering and learning facts and content.'* [Education professional]

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**There is a belief among respondents that relating qualifications directly to the new curriculum would be helpful and clear for learners.** Respondents reported that there would be less confusion for learners, parents and carers and employers if the qualifications follow on directly from the content of the curriculum. Respondents felt that learners in particular would

understand how the qualifications they take are relevant to what they have been learning. They felt that relating qualifications to the new curriculum would ensure learners are given enough support and are more likely achieve good results.

**Qualifications which relate to and support the new curriculum were seen as key to ensuring the aims of the new curriculum are fully realised.** Respondents expressed concern that unrelated qualifications would have a negative impact on the education profession's engagement with the new curriculum. They acknowledged that a significant amount of work has been dedicated to reforming the curriculum and that, if qualifications are not aligned, there is a risk that education professionals would maintain their focus on preparing learners for qualifications according to familiar methods rather than embracing the approach encouraged by the new curriculum, thus undermining both the spirit of the new curriculum and work already undertaken in this regard. Respondents reported that qualifications should be seen as one key element within the wider changes that need to occur simultaneously within the education system in Wales.

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*'We know from experience that teaching at Key Stage 4 tends to be more focused on the requirements of awarding body specifications than published National Curriculum programmes of study. If there is any disconnect between the aims of the new curriculum and qualifications taken at 16, it is unlikely that the aims of the new curriculum will be fully realised.'* [Awarding body]

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**Respondents commented that qualifications should relate to and support the new curriculum to ensure continuous teaching and learning approaches across Key Stages, particularly during the transition between Key Stages 3 and 4.** Respondents identified a risk that the ethos of the new curriculum would not flow into Key Stage 4 if qualifications are not amended to reflect this ethos. Teaching and learning approaches should transition smoothly across all Key Stages, reinforcing skills that learners develop throughout their education.

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*'It is important that this pathway does not end at the age of 14, when formal external qualifications for learners currently commence for assessment at aged 16. It is important that these qualifications form part of the continuum of learning and allow learners to build on and demonstrate prior learning, skills and where appropriate knowledge.'* [Regional education consortium]

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Respondents also expressed general agreement with the proposal without much further elaboration.

### **3.1.2 Considerations regarding this proposal**

Although respondents expressed at least some level of agreement with the proposal, some also took the opportunity to detail considerations they felt should be taken into account when implementing the proposal.

There was a perceived difficulty in achieving the above relationship between qualifications and the aims of the curriculum; **respondents felt that the education accountability system currently places too much emphasis on the achievement of qualifications at 16**. This ‘high-stakes’ approach to assessment means that qualifications taken at 16 were seen by respondents to drive the content, teaching practices and assessment of the curriculum, limiting the curriculum flexibility available for education professionals. Respondents emphasised that weight placed by the education system on these qualifications must be proportionate to ensure that qualifications enhance, rather than override the content and ethos of the new curriculum.

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*‘One of the main issues with the current curriculum is that the qualifications taken at age 16 are driving and determining the curriculum that is taught, ‘the tail is wagging the dog’’. [Education professional]*

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Respondents identified issues of **resourcing, training and practical implementation which should be addressed** as part of qualifications reform. These included ensuring that further and higher education providers are able to respond to new or reformed qualifications and addressing how GCSE resits would be implemented. One such example was how providers would be able to support learners taking the qualifications post-16 as resits, as they may potentially start from the beginning if they were resitting GCSE qualifications that have changed substantially since they first took them. Respondents also emphasised the need for further detail on how changes to qualifications would look in practice, including the process of evidencing how qualifications would meet Qualification Wales’ proposed principles for shaping the future offer.

**Care must be taken to ensure a broad and balanced suite of qualifications is available, with respondents emphasising that the breadth of academic, technical and vocational qualifications should be fit for purpose.** Respondents emphasised this point both in relation to the choice of qualifications which should be on offer and the range of career pathways qualifications should support. Respondents said that qualifications should not be reformed at the expense of a broad offer which meets their progression needs. They also emphasised that even qualifications with low take-up might be very valuable to the learners taking them. Respondents identified a range of types of qualification which they felt must not be negatively affected by any reform process, for example vocational qualifications (with examples such as initial vocational education and training qualifications, level 1/2 Awards and BTECs offered) that might be particularly valuable for certain careers.

Respondents also identified **key educational themes which must be given sufficient weight** within the future qualifications offer. These included both **topics where appropriate qualifications do not currently exist** (such as health and wellbeing) and **qualifications which are perceived as valuable but do not relate strictly to curriculum content only** (including alternatives to formal qualifications such as the Duke of Edinburgh’s Award). These respondents questioned how qualifications could be developed to best ensure such a breadth of opportunities for learners.

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*'The Health and Wellbeing Area of Learning and Experience and Relationships and Sexuality Education will be mandatory for all children and young people...there is a danger that if these areas are not part of young people's qualifications they could lack the status in school that is so urgently required.'* [Commissioner]

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**Respondents also commented that any reform of qualifications must ensure that qualifications are accessible to a wide variety of learners from different backgrounds and with different learning requirements.** Reforms to qualifications must be inclusive, ensuring that qualifications meet the needs of deaf young people, disabled young people, those with ALN and others who may face barriers in accessing qualifications. This theme is closely related to the need for a broad and balanced suite of qualifications, with respondents emphasising that limiting the choice of qualifications available could particularly disadvantage those who face barriers when accessing qualifications.

### 3.1.3 Concerns regarding this proposal

Among the minority who strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal, the themes raised most frequently were as follows.

**Respondents emphasised that qualifications taken by learners in Wales must be comparable with those outside Wales, recognised as equal by further and higher education institutions and must have currency for future employment.** They emphasised that learners in Wales must not be disadvantaged compared to those from elsewhere in the UK when seeking to enter further or higher education, particularly outside Wales. Respondents also expressed concern that qualifications which relate to the new curriculum may not necessarily be understood or valued by employers both within and outside Wales. They also emphasised the need to avoid designing bespoke qualifications to reflect the curriculum in Wales if this would lead to a lack of parity with those taken by learners outside Wales.

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*'We shouldn't have a situation where our qualifications are only valued inside of Wales and they don't act as a passport to the opportunities outside the region.'* [Education professional]

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**Core elements of the current qualifications structure should be maintained, in the opinion of respondents, such as the subject-specific knowledge and core skills necessary for progression into further and higher education.** Respondents felt that there is a clear limit to how far qualifications can reflect the structure of the new curriculum. Respondents expressed particular concern about the potential dilution of subject-specific knowledge and skills under the new curriculum; qualifications at 16 should demonstrate sufficient subject knowledge to ensure learners can transition smoothly into studying specific

subjects at post-16 level and specific careers. As such, respondents emphasised that an AoLEs structure should not be replicated for qualifications taken at 16.

**On occasion, respondents were critical of the approach to the new curriculum itself and the ability of the sector to create qualifications which relate to this curriculum.** This included expressing concerns about the negative impact curriculum reform may have on the education system, the potential for significant variation in how the curriculum is interpreted and implemented by centres across Wales and the perceived ‘vagueness’ of the curriculum to date. Respondents also expressed concerns about the capacity of the sector to adapt qualifications to suit a new curriculum which is still deemed uncertain and open to many interpretations. **As such, respondents also expressed concerns regarding the capacity of the education sector to adapt to numerous and ‘vague’ large-scale reforms that are happening concurrently.** Respondents did not feel that qualifications could yet be suitably amended to reflect the new curriculum and that the workload involved in ensuring all changes to the education system in Wales are implemented consistently is significant.

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*‘We have been told the new curriculum is NOT a national curriculum, but rather a set of guidelines for different areas/authorities/schools to use when designing their curriculum...how can you/WJEC come up with an exam or any kind of test that will cover all local/regional versions of the new curriculum when what pupils learn in school is dependent on their postcode?’ [Education professional]*

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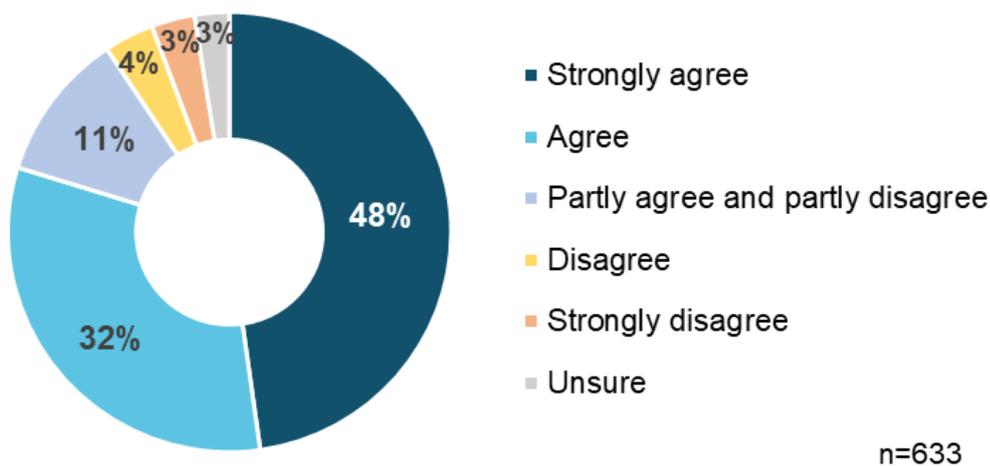
#### **3.1.4 Variation in the views of different groups of respondents.**

- Core and wider education stakeholders were more likely than others to emphasise the need for a broad and balanced suite of qualifications, as well as emphasising the need to avoid qualifications which drive curriculum content and teaching practices.
- Core education stakeholders were also more likely to discuss practical issues relating to the implementation of qualification changes.
- Learners were more likely to indicate that qualifications which relate to the curriculum would be helpful and clear for them and that qualifications must directly link to curriculum content to be worthwhile.
- All groups of respondents, apart from learners, frequently emphasised that qualifications must be comparable and recognised outside Wales.
- All groups of respondents, apart from wider education stakeholders, frequently drew attention to the need for qualifications to facilitate progression into post-16 education and employment.

### 3.2 Principle 2: Qualifications that are available bilingually

**Qualifications Wales should require awarding bodies to make all publicly funded qualifications taken at 16 available in both Welsh and English.**

**To what extent do you agree with this proposal?**



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A total of 633 respondents answered this question and 80% agreed or strongly agreed with the proposal. A further 11% partly agreed and partly disagreed. A total of 341 respondents also provided written comments to support their answer (257 by those who agreed or strongly agreed; 40 by those who partly agreed and partly disagreed; 34 by those who disagreed or strongly disagreed; and 10 by those who were unsure or did not respond to the closed question).

#### 3.2.1 Support for this proposal

Among those who strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal, the themes raised most frequently were as follows.

**Respondents felt that learners should have the opportunity to choose the language in which they undertake their qualifications.** They noted that bilingual qualifications would allow learners to select their preferred language. In particular, respondents commented that learners should be able to undertake qualifications in the language in which they have studied so far and/or the language they consider to be their first or preferred language in which to take assessments. Having this option is seen as essential for catering to the learning needs of Welsh-speaking learners.

<sup>4</sup> Percentages presented for this closed question do not total exactly 100% due to percentages being rounded up or down for presentational purposes.

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*'I believe this depends on the students first language choice but it should be a clear choice as I teach students who have either Welsh or English as their first language at home.'* [Education professional]

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**Unless qualifications are available in Welsh and English, respondents felt that Welsh-speaking learners might be disadvantaged.** Respondents reported two main reasons why they believed that a lack of bilingual qualifications would disadvantage learners. Firstly, learners may not achieve the best possible outcomes if they undertake qualifications in a language other than the one in which they have studied or are most comfortable with. This is because they could be less familiar with relevant English terminology, because they have not been taught the particular subject area in English, or because their level of fluency is higher in Welsh than in English. Secondly, unless all qualifications taken at 16 are available in Welsh and English, Welsh-speaking learners wishing to study through the medium of Welsh would have a narrower range of qualifications to choose from, compared with the range available for those taking their qualifications in English. Respondents commented that this could limit the progression opportunities of those who wish to undertake their qualifications through the medium of Welsh. The requirement of a broad and balanced suite of qualifications to meet all learner needs may not be achieved if qualifications cannot be made available in both Welsh and English.

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*'Students should have the opportunity to take qualification in the language in which they were taught a subject. Correct use of technical vocabulary and the ability to use precise language in describing concepts and processes, are vital in demonstrating good understanding.'* [Representative body]

*'For people whose first language is Welsh, they are automatically disadvantaged if they have to sit the exam in English.'* [Learner]

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**Respondents expressed the view that learners have a right to qualifications in Welsh and English, as a core principle of equality and inclusiveness.** Respondents commented that there should be equal opportunities for learners to be assessed through the medium of Welsh, in line with the legal status of the Welsh language and the rights of learners to equality in education. They noted that Wales is a bilingual nation and felt that the education system should reflect this fact. They emphasised that the Welsh language is a part of Welsh heritage and culture and Welsh-medium qualifications should therefore be accessible to all learners. This was seen as a way to ensure Welsh and English-medium centres would be treated equitably and that learners would be able to progress through their education in the language of their choice. Similarly, qualifications in Welsh and English were seen to reflect the rights of learners as set out in the United Nations Convention on the Rights of the Child and the Welsh language requirements set out in the Well-being of Future Generations Act.

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*'We know that some very worthwhile and appropriate qualifications are not are [sic] available in Welsh, if a young person is denied access to these because they are not to be funded, then there is a conflict here between the new curriculum's ambition to promote equity, equality of opportunity and inclusiveness.'* [Third sector organisation]

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**Respondents believed that qualifications in Welsh and English would align with and support key national strategies and policies.** In particular, respondents reported that the adoption of this principle would be the only way to ensure qualifications reflect and support Welsh Government's Cymraeg 2050 Welsh language strategy.<sup>5</sup> Respondents identified qualifications in both Welsh and English as a key factor in the success of Welsh Government's aim to reach a million Welsh language speakers by 2050.

**They also commented that qualifications in Welsh and English would support and raise the profile of the Welsh language more generally.** Respondents reported that the provision of qualifications in Welsh and English would be likely to support the wider social use of Welsh, preserving and strengthening the cultural position of the Welsh language. This principle was also seen as a way of emphasising the value Wales places on the Welsh language.

**In addition, respondents felt that qualifications in Welsh and English would improve career opportunities and Welsh language skills.** Respondents reported that Welsh language skills are valued by employers and that qualifications in Welsh would provide opportunities for learners to enhance their existing Welsh language skills.

Respondents also expressed general agreement with the proposal without much further elaboration.

### **3.2.2 Considerations regarding this proposal**

Although respondents expressed at least some level of agreement with the proposal, some also took the opportunity to detail considerations they felt should be taken into account when implementing the proposal.

**There were practical issues identified for Qualifications Wales to consider if awarding bodies were required to make all publicly funded qualifications taken at 16 available in Welsh and English, particularly the issue of exceptions to this principle.** Respondents noted that resourcing would need to be considered, as well as the practicalities of ensuring Welsh and English qualifications are available in a timely manner. Respondents also expressed mixed views about how exceptions to this principle would be addressed; some respondents reported that a proportionate and realistic approach would need to be taken where qualifications are not available or deemed necessary in Welsh and English, while others emphasised that there should be no exceptions and that Welsh and English qualifications should be obligatory.

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<sup>5</sup> Welsh Government (2017), [Cymraeg 2050: A million Welsh speakers](#).

**There was a perception that maintaining a suitable breadth of qualifications would be vital if requiring awarding bodies to make all publicly funded qualifications taken at 16 available in Welsh and English.** Respondents emphasised that implementing this principle should not result in a more limited choice of qualifications for learners. They agreed with the principle but reported that they do not necessarily wish to see qualifications being withdrawn from the offer if they cannot be made available in Welsh. As such, respondents did not wish for such a principle to inadvertently disadvantage some learners where implementation of the principle is challenging.

**Related to the above, respondents identified challenges associated with requiring awarding bodies located outside Wales to make qualifications taken at 16 available in Welsh and English.** Respondents identified a risk that awarding bodies based outside Wales would find it challenging to provide all qualifications in both Welsh and English (particularly due to the availability of resources). They expressed concern that this would lead to awarding bodies based outside Wales reducing or removing the qualifications they offer within Wales, limiting the choice available to learners. As such, respondents deemed it important to suitably support and incentivise these awarding bodies to align with this principle (for example through the provision of grants to support Welsh-medium qualifications).

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*'[Our organisation] strongly supports the general principle of equality of provision of publicly funded qualifications in both Welsh and English. However, it is equally important that learners in Wales should not have their access to qualifications restricted because of a requirement to make provision in both languages. This consideration is especially important with respect to vocational qualifications, where provision in Welsh is currently much more limited; and to qualifications taken by only a small number of learners.'* [Third sector organisation]

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**Respondents noted that it would not be sufficient for qualifications themselves to be in Welsh and English; wider supporting materials would also need to be available in Welsh and English.** Textbooks, revision guides, and other teaching and learning resources should be available bilingually, with both Welsh and English versions made available at the same time.

### **3.2.3 Concerns regarding this proposal**

Among the minority who strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal, the themes raised most frequently were as follows.

**Respondents expressed concern that requiring awarding bodies to make all publicly funded qualifications taken at 16 available in Welsh and English is likely to disadvantage learners by limiting their choices.** This theme reflects earlier comments regarding the need to maintain a suitable range of qualifications, but these respondents expressed more deep-rooted concerns. Respondents considered that awarding bodies would

be unable to provide all qualifications in Welsh and English (particularly in specialist subject areas) and as a result, the range available to learners would certainly be narrower. They felt that the way to ensure a suitable breadth of qualifications to meet all learner needs is to allow learners to continue to take qualifications, even if they are not available through the medium of Welsh.

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*'There are fantastic qualifications offered by English examination boards that 'fill the gap' for vocational qualifications. These meet the needs of learners that are not suitable for academic GCSE study. It would be extremely detrimental to these learners if our centre was unable to offer vocational provision...because there are no comparative qualifications offered by bilingual examination boards.'* [Education professional]

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**There was also a concern amongst respondents that requiring awarding bodies to make all publicly funded qualifications available in Welsh and English is likely to be prohibitively expensive.** Respondents expressed concern that the additional cost of producing bilingual resources, as well as translating assessment materials and candidate responses, would be high. In particular, respondents felt that such work would not be financially viable or sustainable where take-up of certain qualifications is low. On occasion, respondents felt that take-up would indeed be low, as **they felt there was both insufficient demand for Welsh-medium qualifications and too few Welsh speakers, making it difficult to justify this requirement.**

**Similarly, there was a perception amongst respondents that there is insufficient Welsh language expertise available to provide high-quality qualifications in Welsh and English.** Respondents commented that the required expertise to assess qualifications through the medium of Welsh is not necessarily currently available in awarding bodies outside Wales, nor is the specialist knowledge needed to create subject-specific resources through the medium of Welsh. Respondents also noted that this principle could lead to translating candidate responses or evidence on a regular basis, which was viewed as a sub-optimal service to learners and could introduce risk into the assessment process.

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*'[The challenges of providing Welsh-medium qualifications include] the limited availability of Welsh speaking subject-expert examiners. Objections and complaints from learners, centres and other stakeholders where candidate work has to be translated from Welsh into English for marking or post-results review of marking. The increased risk to the delivery of accurate results to schedule when translation and/or individual bilingual examiners must be relied upon.'* [Awarding body]

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**Respondents also commented that they felt Welsh-medium qualifications are not necessarily appropriate for all subject areas.** Respondents felt that not all subjects should be examined through the medium of Welsh as it wouldn't necessarily be beneficial for the learner, or relevant to the subject. In particular, respondents considered that it might not be

appropriate to assess Science, Technology, Engineering and Mathematics (STEM) subjects in Welsh because they considered that having knowledge of terminology in English was also important in these subject areas.

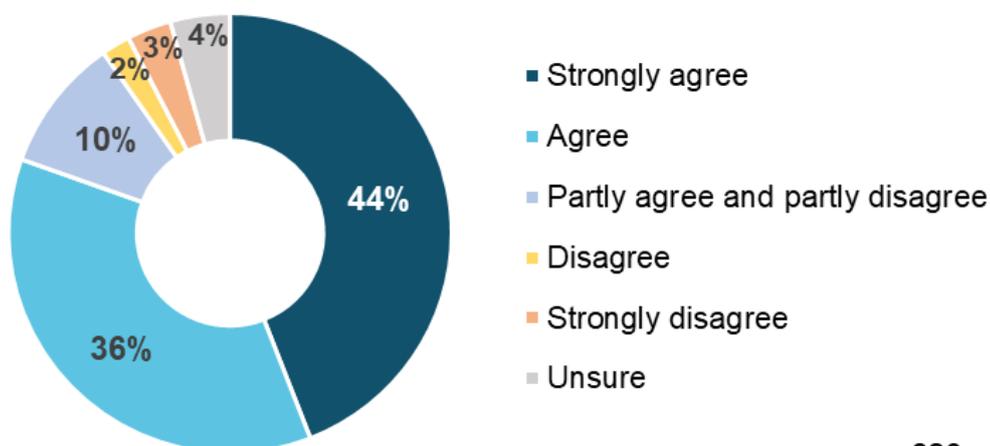
### 3.2.4 Variation in the views of different groups of respondents.

- Core education stakeholders were more likely than other respondents to raise a few of the themes discussed above, namely: that qualifications in Welsh and English would align with and support key national strategies and policies; that maintaining a suitable breadth of qualifications would be vital; that learners should have the opportunity to choose the language in which they undertake their qualifications; that there would be challenges for awarding bodies outside Wales to make qualifications available in Welsh and English; that unless qualifications are available in Welsh and English, Welsh-speaking learners might be disadvantaged; and that the wider qualifications package must be available in Welsh and English.
- Both core and wider education stakeholders were more likely than other respondents to raise practical issues that should be considered.
- The requirement for equal opportunities was raised by all groups of respondents, though core education stakeholders were slightly more likely to raise this theme.
- Learners and education professionals were slightly more likely to note that Wales is a bilingual nation.

### 3.3 Principle 3: Qualifications that form part of an equitable and coherent offer

**Qualifications Wales should more closely manage the range of publicly funded qualifications that centres can offer to 16-year-olds to make sure it is equitable and coherent.**

**To what extent do you agree with this proposal?**



n=620

6

<sup>6</sup> Percentages presented for this closed question do not total exactly 100% due to percentages being rounded up or down for presentational purposes.

A total of 620 respondents answered this question and 80% agreed or strongly agreed with the proposal. A further 10% partly agreed and partly disagreed. A total of 308 provided written comments to support their answer (225 by those who agreed or strongly agreed; 40 by those who partly agreed and partly disagreed; 29 by those who disagreed or strongly disagreed; and 14 by those who were unsure or did not respond to the closed question).

### 3.3.1 Support for this proposal

Among those who strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal, the themes raised most frequently were as follows.

**Respondents emphasised the importance of ensuring equity through maintaining an appropriate choice of qualifications that suit the diverse needs of learners.** Respondents commented on the need for consistency and clarity, and the need to ensure fairness for all learners, regardless of their needs, abilities and aspirations. This typically included equity and fairness for specific groups of learners (e.g. Black, Asian and Minority Ethnic groups and learners with ALN) and those in non-mainstream settings, such as Pupil Referral Units and special schools. Respondents specifically commented on the need for qualifications to cater for the needs of lower ability learners and raised concerns about the perceived risks of narrowing the options available to learners. This theme was often raised alongside comments supporting the maintenance or expansion of vocational qualifications (this theme is discussed separately below).

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*'I think qualifications and the education system in general needs to be more tailored to the individual needs of the learner and their goals.'* [Learner]

*'If qualifications don't offer something to everyone they may be put off continuing their education.'* [Learner]

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Respondents emphasised **the importance of ensuring that qualifications at 16 enable a smooth transition from Key Stage 3 and progression onto post-16 learning.**

Respondents commented that one of the purposes of qualifications was to enable learners to progress to the next stage of their development. Respondents referred to the need for learners to be adequately prepared for post-16 qualifications, and for qualifications at 16 to align with these. Ensuring learners at the end of Key Stage 3 were ready to take qualifications at 16 was also mentioned by respondents.

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*'Qualifications should be a springboard for your next steps and the knowledge you have from previous qualifications should help you in your current qualification. Qualifications should show your skills and individuality, not ability to jump through hoops.'* [Learner]

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**Respondents commented on the importance of maintaining qualification ‘currency’ so that qualifications are valued by learners, employers and post-16 learning providers.**

Respondents typically raised this alongside the importance of portability (i.e. ensuring that qualifications are recognised and valued outside Wales). There was concern that any significant divergence because of qualifications reform could potentially disadvantage learners from Wales who move elsewhere.

**Respondents also emphasised the importance of ensuring that the suite of qualifications is quality assured, managed or overseen by a central organisation.** The reasons given by respondents for this tended to focus on the need to ensure that consistently high standards were maintained, with the continued oversight of a central organisation providing reassurance to learners, providers and employers. Respondents expressed support for the principle of avoiding duplication and, on occasion, expressed the view that there were currently too many qualifications with little or no take-up.

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*‘At the moment several courses exist where the content overlaps. If schools and colleges are to make informed decisions regarding the curriculum they offer, there is a need for the offer to be simplified by Qualifications Wales.’ [Local authority] (Translated from Welsh)<sup>7</sup>*

*‘It is important that there is a consistent approach across Wales. It would seem appropriate that there is an overall body that oversees provision of publicly funded qualifications, in conjunction with the relevant examination boards.’ [Representative body]*

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**Assessment methods were seen to require careful consideration alongside qualification content.** Respondents indicated that a variety of assessment methods are needed alongside exams. This was typically raised alongside comments on the need to cater for the needs of all learners, including those with lower abilities and ALN.

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*‘Young people need an opportunity to show their skills, and should have a wide variety of approaches used as assessment in order to do this.’*  
[Teaching union]

*‘People learn in different way [sic], there needs to be more range of assessment. Those who do not cope well in exams may not even bother trying because they know that they will not do very well. Exams don’t help to build other skills as much as course work which helps more with organisation skill, independent [sic] and time management.’ [Learner]*

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<sup>7</sup> Original quote in Welsh: ‘Ar hyn o bryd mae sawl cwrs yn bodoli lle mae’r cynnwys yn gorgyffwrdd. Er mwyn i ysgolion a cholegau wneud penderfyniadau doeth o ran y cwricwlwm maent yn cynnig, mae angen symleiddio’r cynnig gan Gymwysterau Cymru ac yn bellach na hyn, mae angen iteru ar y broses o chwilio am y pynciau yma’.

**Respondents perceived there was a need to consider the nature of centre accountability measures alongside the future of qualifications.** Respondents considered that careful oversight of qualifications was required to ensure that a wide variety of qualifications were available, while also ensuring that high standards were maintained. On occasion, concerns were raised by respondents that there was a risk that centres could have an incentive to choose qualifications that were perceived to be ‘easier’. Education professionals and wider education stakeholders commented on this issue, noting that accountability measures such as the Capped 9 measure could influence centres’ behaviours and choices in relation to qualifications, creating unintended incentives to choose particular qualifications.<sup>8</sup>

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*‘A compromise is needed here and a trade-off between having an appropriate range and type of qualification available for Welsh learners and not having a situation where schools are looking for the ‘easiest’ version of a qualification to try to boost their outcomes.’ [Education professional]*

*‘While schools and learners should be able to choose from a range of qualifications to suit learning needs there needs to be rigour in the system. All qualifications should uphold the highest standards and there should not be duplicate courses that offer a less rigorous route and awarded the same number of points or carry the same weight in performance measures.’ [Education professional]*

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**Respondents emphasised the importance of maintaining and expanding the availability of vocational qualifications.** Comments on this theme were often linked to ensuring that the needs of all learners were catered for, with respondents highlighting the importance of these types of pathways for learners of different abilities.

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*‘We believe there should be a good balance of academic and vocational courses. It is important that the range of qualifications allows for progression to academic (including subject disciplines leading to A level or equivalent and then degree level) and vocational routes. In addition, there should be a greater range of courses suitable for pupils with different types of additional learning needs. Currently these pupils do not have bespoke qualifications to sufficiently cater for their needs; often they have to follow Level 1 versions of courses, which are often not bespoke to their needs and abilities.’ [Local authority]*

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Other themes raised by respondents included the following:

- a need for more detailed information about specific qualifications;
- that GCSE qualifications from awarding bodies other than WJEC should be available to learners in Wales; and
- issues relating to limited funding and a lack of staff capacity with providers.

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<sup>8</sup> Welsh Government (2019). [Guidance on the calculation of the Capped 9 Points Score \(interim\)](#).

### 3.3.2 Concerns regarding this proposal

Many similar themes to the above were raised among the minority who strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal. The themes raised most frequently by this group were as follows.

**Respondents commented that centres and/or practitioners are best placed to make decisions about the qualifications that should be offered to learners.** Respondents who disagreed with the principle emphasised the importance of centre's choice. Respondents noted that centres and practitioners were best equipped to make these decisions based on their understanding of their learners' needs and the local labour market.

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*'This is the role of the school leadership, governors and challenge advisers - they should ensure that all schools provide appropriate pathways for all learners. In some contexts this may mean narrowing the range. It is all about the examination process offering something broad and balanced and in keeping with the 4 Purposes.'* [Local authority or regional education consortium]

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**Respondents commented on the importance of maintaining an appropriate choice of qualifications that suit the diverse needs of learners.** They expressed the view that the choice of qualifications available to learners shouldn't be curtailed as this could disadvantage some learners.

Other issues raised by those who disagreed with the proposal were more general comments relating to the management and oversight of qualifications, concerns about maintaining currency of qualifications, comments on how 'equitable' and 'coherent' were to be defined and that GCSE qualifications from exam boards other than WJEC should be available to learners in Wales.

### 3.3.3 Variation in the views of different groups of respondents.

- Learners were more likely than other respondent groups to comment on the importance of maintaining learner choice, fairness, progression and currency.
- Core education stakeholders were more likely than other respondent groups to emphasise the importance of equity and to comment on issues relating to assessment.
- Core and wider stakeholders were more likely than other respondent groups to mention issues relating to oversight, quality assurance and avoiding duplication.
- Education professionals were more likely than other respondent groups to comment on the importance of maintaining centre/practitioner choice and centre accountability.
- Learners did not generally comment on the importance of centre choice, centre accountability and quality assurance.

### 3.4 Other principles

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**Are there any other principles you think we should consider when deciding which qualifications to make eligible for public funding for 16-year-olds in Wales?**

**Please explain your answer.**

A total of 235 respondents provided comments relating to this question. However, of these, 14 stated that they were content with the three principles, or that they did not think there were any other principles that Qualifications Wales should consider. Therefore, once these comments were removed, 221 respondents' comments were thematically analysed.

#### 3.4.1 Other principles identified by respondents

Respondents' suggestions in response to this question frequently referred to principles that were already included in the consultation document. **Respondents reiterated the importance of various aspects of Principles 1 and 3 in their responses to this question.** Comments reiterating the importance of Principle 1 noted the need for qualifications at 16 to support the new curriculum and mentioned the four purposes of the curriculum as a guiding principle. In relation to Principle 3, respondents emphasised the importance of ensuring qualifications meet the needs of all learners, including those with lower academic abilities, ALN learners, and those who prefer to take qualifications through the medium of Welsh. Respondents expressed views relating to this in a variety of ways, including inclusivity, accessibility, ensuring learner choice and catering for all learners.

The other principles raised most frequently by respondents to this question were as follows.

**Respondents emphasised the importance of maintaining and expanding the availability of vocational qualifications.** Respondents often raised this principle in general terms, in the context of providing appropriate educational and career pathways for learners of all abilities and needs. Ensuring equal status for vocational and academic qualifications was also mentioned by respondents who raised this principle. On occasion, respondents supported their view with comments relating to vocational qualifications in their own subject area or specific vocational qualifications that they used.

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*'As previously stated, there should be variety in the qualifications suite offered to pupils to include both academic and vocational, but which are also through informal assessment and not wholly reliant on exams.'* [Education professional]

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**Maintaining the currency and standards of qualifications and ensuring that qualifications from Wales are recognised by employers and post-16 providers outside Wales was also considered important.** Respondents commented on the importance of ensuring that employers continued to recognise and value the qualifications that are made available and that qualifications maintain their value for learners in the labour market. Maintaining the portability of qualifications was considered important among respondents, who

commented on the importance of qualifications not diverging too significantly from England. This principle was occasionally mentioned alongside comments on the perceived value of maintaining the GCSE brand.

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*'They must be well-respected internationally and those testing academic ability should be as rigorous as current provision - not just examining wide areas of learning otherwise our pupils won't be competitive in the race for university places.'* [Education professional]

*'That the qualifications prepare young people for work and employment, are of interest to young people, can compete at international level.'* [Education professional] (Translated from Welsh)<sup>9</sup>

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### **Respondents emphasised the importance of ensuring that qualifications at 16 are part of a smooth progression pathway between Key Stage 3 and post-16 education.**

Respondents commented on the need to ensure coherence between different stages of education. This was also expressed as 'avoiding too much of a jump' between educational stages. Respondents also commented on the risks of developing qualifications that are too broad and do not enable specialism to prepare learners for A Levels. This point was occasionally raised alongside respondents' views on whether qualifications should be maintained in traditional subjects, or broader curriculum-area qualifications (e.g. AoLEs). On occasion, education professionals related this to current challenges relating to non-specialist staff teaching subjects.

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*'The previously mentioned point on managing the interface between the new quals and the post 16 curriculum would be our key concern. There is an ambition towards more learners continuing their education post 16 and so there should not be any degree of jarring in the transition from curriculum 2022 to post 16 vocational education in particular.'* [Further education representative]

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**Maintaining an appropriate variety of approaches to assessment was also considered important by respondents.** This was typically mentioned as a principle by respondents who noted that different assessment methods are suited to different subjects and that not all learners prefer exam assessment. Respondents often raised this alongside comments on the need to cater for learners of all needs and abilities.

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<sup>9</sup> Original quote in Welsh: 'Bod y cymwysterau yn gwneud pobl ifanc yn barod am waith cyflogedig, o ddiddordeb i'r pobl ifanc, yn gallu cystadlu ar lefel rhyngwladol.'

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*'It must be considered that all subjects and qualifications are taught in different ways and therefore may need to be assessed in different ways. I believe strongly that it is impossible to assess every subject or qualification using the same method and that a mix of assessment methods are needed in subjects in order to suit pupils of different abilities.'* [Education professional] (Translated from Welsh)<sup>10</sup>

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**Respondents identified a need to ensure that qualifications at 16 equip learners with wider skills.** This principle was raised in general terms by respondents, and on occasion it focused on specific areas of learning such as financial literacy, citizenship, digital skills, entrepreneurship, life skills and practical skills.

**Respondents also identified a need to consider financial pressures and value for money when making decisions on funding qualifications.** Respondents raised this in the context of funding challenges in the education sector, and associated pressures on staff capacity and resource availability.

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*'Across Wales, many schools are facing budget cuts and an important consideration is the cost of qualifications, associated resources and professional learning. Increased examination entry costs can have unintended consequences for learners, as schools may become reluctant to enter pupils who are not guaranteed to achieve well. Schools report that they are facing an increase in their examination entry costs and there is a need to ensure that all qualifications represent good value for money.'*  
[Public body]

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**Other principles** raised by respondents included the need to consider learner wellbeing, children's rights, local labour market needs, centre accountability and performance measures and streamlining qualifications.

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*'To ensure that qualifications are consistent with a children's rights approach and the UNCRC I propose three additional principles for awarding public funding to a qualification: The qualification supports the optimum development of talent and skills, in accordance with Article 29 of the United Nations Convention on the Rights of the Child. The qualification supports the wellbeing of children and young people. Young people's experiences and views have informed the decision to award public funding to this qualification.'* [Commissioner]

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<sup>10</sup> Original quote in Welsh: *'Mae'n rhaid ystyried bod pob pwnc neu cymhwyster yn cael eu dysgu mewn ffyrdd gwahanol ac felly o bosib angen cael eu hasesu mewn ffyrdd gwahanol. Credaf yn gryf ei bod yn amhosib asesu pob pwnc neu cymhwyster gan ddilyn yr un dull a bod angen cymysgedd o ddulliau asesu mewn pynciau er mwyn siwtio disgyblion o alluoedd gwahanol.'*

### **3.4.2 Variation in the views of different groups of respondents.**

- Education professionals, core and wider education stakeholders were more likely than learners to offer additional principles in response to this question; those learners who provided comments most often noted they were content with the principles.
- Education professionals were more likely than other groups to refer to the need to maintain or enhance the availability of vocational qualifications.
- Core education stakeholders were more likely than other groups to comment on assessment.
- Core and wider education stakeholders were more likely than other groups to mention principles relating to supporting the curriculum, ensuring inclusivity and accessibility and currency.
- Core education stakeholders and education practitioners were more likely to comment on issues relating to portability.

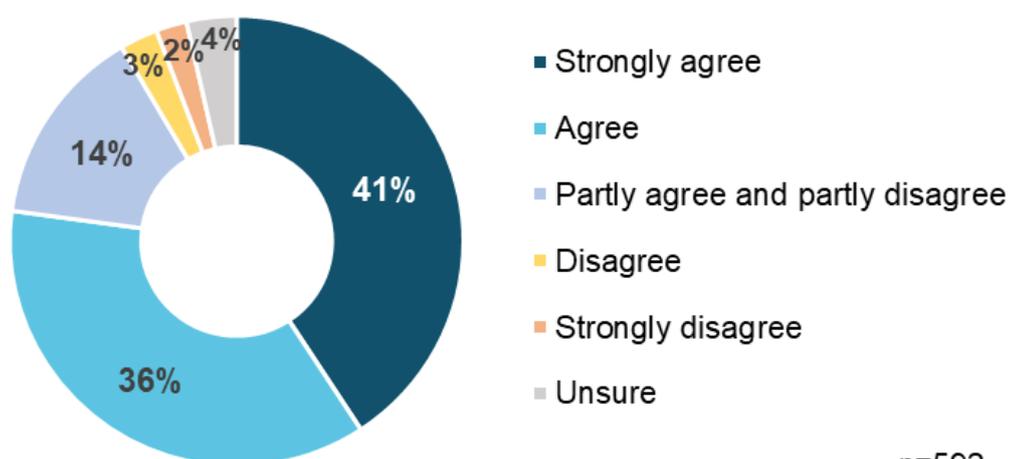
## 4. GCSEs fit for the future

'Qualified for the future' outlined Qualifications Wales' proposals to retain the GCSE brand but redesign the qualifications themselves for 16-year-old learners in Wales. Respondents were asked to provide their views on these proposals.

### 4.1 Retaining the GCSE name

**On balance, we think that the GCSE name should be retained for the redesigned qualifications that will form a central part of the qualification offer for 16-year-olds in Wales.**

**To what extent do you agree with this proposal?**



n=592

A total of 592 respondents answered this question and 77% agreed or strongly agreed with the proposal. A further 14% partly agreed and partly disagreed with the proposal. A total of 295 provided written comments to support their answer (207 by those who agreed or strongly agreed; 51 by those who partly agreed and partly disagreed; 26 by those who disagreed or strongly disagreed; and 11 by those who were unsure or did not respond to the closed question).

#### 4.1.1 Support for this proposal

Among those who strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal, the themes raised most frequently were as follows.

**Respondents said that GCSEs are recognised qualifications. They have currency among learners, employers, education institutions, and parents, and any change could cause confusion and unnecessary instability for these stakeholders.** Respondents expressed concern that any change could be detrimental to Wales. They believed that employers have confidence in GCSE qualifications and the knowledge and skills which they assess. They acknowledged that there was a case for reform, mainly in order to modernise

the qualification system, so it was fit for purpose. However, they felt that the risks associated with moving away from the GCSE brand outweighed those benefits. On occasion, respondents considered that the case for changing the GCSE brand could be made at a later date and they advocated for the status quo in the interim period.

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*'It is important to retain the world-wide status of GCSE. Also, employers like using core GCSEs (Maths, Welsh and English etc) to compare. But it is important to have a change for the better but not to complicate things.'*  
[Learner] (Translated from Welsh)<sup>11</sup>

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**Other respondents recognised the case for changing or at least reforming the content and format of GCSEs and to recognise new areas of study while retaining the GCSE name.** They believed these could be changed while still adhering to the GCSE brand. Respondents perceived vocational brands as lacking status relative to GCSE and felt that these types of qualifications should be renamed (to GCSE, for example, if that name was retained). However, other respondents believed it was important to retain vocational qualification brands such as Business and Technology Education Council (BTEC) qualifications, again primarily because they are recognised and established.

**Respondents were also keen to ensure that the standards and rigour associated with GCSEs was retained and felt this was best achieved through retaining the GCSE name.** This meant adhering to the standards and the philosophy on which GCSEs were conceived. It was also important that GCSE assessments should continue to include exams, where appropriate.

**It was deemed important that the portability of GCSEs is retained, and that the qualification is recognised outside Wales.** Respondents believed it is important to keep a universally recognised qualification and many referred specifically to the need for any qualification used in Wales to be recognised in other parts of the UK.

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*'Wales should not stray too far from the established and understood qualifications and associated standards in other regions of the UK. The world is shrinking and our young people need qualifications that are recognised and respected in other parts of the UK and beyond'. [Third sector organisation]*

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**Respondents noted that previous efforts to develop Wales-specific brands such as the Welsh Baccalaureate (Welsh Bacc) had proved challenging** because stakeholders both in Wales and further afield had not been easily convinced by the notion of a Wales-specific qualification. A move away from the GCSE name could create scepticism about the proficiency levels of learners from Wales. This, they believed, would not serve learners in

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<sup>11</sup>Original quote in Welsh: *'Mae'n bwysig iawn bod statws byd eang TGAU yn cael ei gadw. Yn ogystal mae cyflogwyr yn hoffi defnyddio'r TGAU mewn pynciau craidd (Maths, Cymraeg a Saesneg ayb) er mwyn cymharu. Ond mae'n bwysig cael newid er mwyn y gwell ond does dim angen cymhlethu.'*

Wales or the reputation of Wales' education system. On occasion, respondents went further, arguing that ensuring parity between GCSEs in Wales and England meant GCSEs in Wales should be changed to align with the reformed GCSEs in England and the EBacc measure.<sup>12</sup>

Those in favour of retaining the GCSE name included some who recognised the need to change the content of GCSEs. In particular, **respondents advocated closer alignment between course content and future economic needs**. One respondent advocated exploring how the content of specific subjects could be tailored to a work context and the use of '*real world examples to demonstrate a skills currency*'.

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*'We all agree that the range and content of qualifications must be changed significantly if they are to genuinely reflect the intentions and the content of the new curriculum, focus on the new AoLEs and include the range of knowledge, skills and experiences outlined.'* [Employer]

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**Respondents felt that qualifications should be taken at the most appropriate age for learners.** On the whole, respondents agreed that GCSEs should continue to be taken at 16, but there was some support for enabling people to take them later in life, on the grounds that some learners are not ready to sit exams at 16.

#### 4.1.2 Concerns regarding this proposal

Among the minority who strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal, the themes raised most frequently were as follows.

**The new curriculum for Wales was seen as a radical new departure for Wales and respondents felt that qualifications should reflect this.** Respondents mentioned the fact that Wales is developing a new curriculum with new priorities and structures in order to meet the challenges of the future. They argued that this provides a forward-looking, modern curriculum which should be reflected in the qualifications which learners take at 16.

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*'Keeping 'GCSE' does not send a message of change and is likely to inhibit true acceptance of the fundamental shift within the new curriculum by those within the profession as well as those outside the profession. If maintaining GCSE is to reduce fears that the new curriculum is in any way 'less' than English/Scottish equivalents, then it is perhaps cowardice when placed alongside the risks being taken to develop something special in Wales.'*  
[Education professional]

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<sup>12</sup> The English Baccalaureate (EBacc) is a performance measure showing the proportion of children in a secondary school who achieve a grade C or more in English, maths, a science, history or geography and a language.

They felt that a bold approach was therefore required and that there were ways of addressing issues of comparability with qualifications in England and elsewhere. They suggested this could be achieved by designing more refined and rigorous methods of comparison which takes meaningful account of the differences within the qualifications pursued by learners at 16 in different countries.

**Respondents noted that retaining GCSEs could give the wrong impression that the curriculum changes only applied up until the age of 14.** Respondents believed that the ethos and principles underpinning the new curriculum were ones that should guide the experiences of learners up to the age of 16. Retaining the GCSE brand could give the impression that the curriculum was being changed up until the age of 14 and that the status quo applied thereafter with no need for reform.

**Respondents also expressed concern that retaining GCSEs would perpetuate the habit of comparing Wales primarily with England.** Respondents felt that this comparison was unhelpful because of the perceived disadvantages of the English system, particularly in the context of what they believed to be the detrimental impact of reforms to GCSEs in England. Respondents believed that Wales should forge ahead with a modern curriculum, designed with its own needs in mind and informed by international good practice and not be constrained by the need to retain the GCSE brand or align with changes happening in the education system in England.

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*'Given the increasingly "traditional" content, subject choice (English Baccalaureate), and teaching methods this will, by definition severely restrict both curriculum design and pedagogical methods totally undermining any attempts at delivering a new Welsh curriculum. Far better if external qualifications are to be considered at 16 for these to follow Scotland and have a new and distinctly Welsh name. This will also give much more freedom for those designing the new curriculum and will encourage pedagogical innovation, as all stakeholders will see this is not simply a "rebranding" of existing pedagogy and assessment.'* [Education professional]

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**Respondents directly countered the portability argument on the basis that Wales should not be held back by approaches which had been introduced in England.** Respondents cited the example of Scotland which pursued its own course. On occasion, respondents felt that the Scottish model is more akin to what Wales needs.

Echoing the comments of those who wanted to introduce more refined methods of assessing comparability between different qualifications, it was noted that **GCSEs have already diverged to some extent and that it is likely that GCSEs in Wales would not be assessing the same content and skills as those in England.** Therefore, a new name would be required to differentiate between the two qualifications, given that they would be working to different specifications.

**Respondents believed that changing the terminology could lead to parity of esteem for all qualifications.** Respondents commented that a change would enable a new suite of qualifications for Wales to include (and provide parity of esteem for) vocational subjects offered to learners aged 14-16.

#### 4.1.3 Variation in the views of different groups of respondents.

- Core and wider education stakeholders were more likely than others to mention the GCSE name, but opinions were divided as to whether or not it should be retained.
- Core education stakeholders were also more likely to raise the issue of parity with qualifications in the rest of the UK, particularly England.
- Learners were more likely to mention the timing of exams as a concern and valued the fact that GCSEs are established and recognised qualifications. Learners were also more likely to offer specific suggestions for how GCSEs might be reformed to better suit the needs of young people in response to this question.
- All groups of respondents frequently emphasised that the GCSE is a recognised brand outside Wales and therefore has currency and portability.

## 4.2 Suggestions for how GCSE qualifications could change

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**Do you have any specific suggestions for how GCSE qualifications could change to meet our vision and to support the aims and purposes of the new curriculum?**

**Please explain your answer.**

### 4.2.1 Suggestions made by respondents

A total of 354 respondents provided written comments to this question. The themes raised most frequently were as follows.

**Respondents advocated the status quo because the case for change had not been made.** They believed that the GCSE brand should be retained (as reflected in responses to the previous question). They emphasised the need for GCSE exams to be sufficiently rigorous and challenging.

**A variety of comments about the range of assessment methods that should be used and the balance between those different methods were made.** On occasion, respondents expressed strong views that the amount assessment via exams should be reduced. In general, respondents believed that more focus should be placed on assessing skills rather than testing what learners had memorised.

Respondents frequently commented on the importance of using a range of non-examination assessments (NEA).<sup>13</sup> NEA covers a range of assessment approaches including coursework, oral assessment, fieldwork, portfolio work and practical assessment) as a means of assessing learners at GCSE.

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<sup>13</sup> Defined as a type of assessment other than an exam taken by all candidates at the same time

The suggestions included:

- increasing the amount of practitioner-assessed work included in GCSEs;
- more project-based coursework;
- task-focused assessment;
- use of modular testing;
- developing the use of portfolios of evidence; and
- assessing skills such as delivering presentations throughout the year.

**Respondents highlighted the need to take account of disabled learners by ensuring qualifications were inclusive and accessible for all learners. Specifically, they referred to the importance of making exams accessible to disabled learners and those with ALN.**

Respondents highlighted the needs of learners who they believed were not being served by the current system, in particular those for whom exams are not currently accessible.

Respondents also believed assessments tailored to the level individual learners are working at should be used more often, instead of primarily using standardised assessments.

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*‘Some students that are assessed as having severe dyslexia for example, can get up to 50% extra time in an exam, but sit the same paper as everyone else. My issue with this is, if you cannot correctly order the letters/words in two hours, you can't in three either. Particularly in the case of the English Language paper, this is not a fair comparison. There needs to be a separate paper for those with a statemented need.’ [Education professional]*

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**Respondents believed that much could be learned from the alternative methods typically used to assess vocational learning.** These were perceived to use more flexible methods of assessment. However, this was not a universal view. On occasion, **respondents expressed concern about the use of alternatives to externally-marked end of course exams, mainly on grounds of rigour and the need for external perspectives to ensure standardisation and impartiality.** Respondents referred specifically to the risk that centres and individual practitioners could seek to inflate grades if practitioner assessment was to be the main method of assessment. Respondents believed this was inevitable if GCSE results continue to be used as an accountability measure within the system. A separate issue was highlighted by respondents who were concerned about the implications of any increase in NEA on practitioners' workload.

**There were mixed views about the extent to which online or digital forms of assessment should be used.** On occasion, respondents advocated increasing the use of online or digital assessment. However, there was also some concern that the infrastructure and capacity for digital/e-assessment was not sufficient at present.

There were mixed views about the use of tiered assessments, which were only mentioned by a very small number of respondents; while some believed they were useful, others felt that

they could be demotivating for learners especially if their outcomes were constrained due to the tier for which they had been entered.

**Respondents reiterated the point made in response to previous questions about the need to change the way the outcomes of qualifications were reported.** There were suggestions that the use of numbered grades (for example, 1-7) could be used. However, others argued against change, noting that measures such as five A\*-C were widely recognised, for example by employers, parents and learners, as well as being the basis of a measure of centre performance. The need to ensure that any new system was well-understood would therefore be essential if any change was made.

**The importance of ensuring that qualifications assessed learners' skills was highlighted in many of the responses to this question.** Respondents referred to the importance of reflecting the priorities of the new curriculum, for example:

- ensuring learners' literacy, numeracy and digital skills were assessed;
- taking account of skills such as creativity, problem-solving, digital and communication skills;
- measuring learners' ability to build long-lasting relationships built on empathy; and
- recognising learners' behaviours, for example whether they displayed characteristics of enterprising, confident and resilient learners.

At the same time, several respondents referred to the need to examine learners' ability to apply knowledge.

**However, while some respondents highlighted the importance of learners' skills, on occasion other respondents emphasised the need for rigorous assessment of subject content. Respondents were divided on the question of whether exams should continue to assess learners on the basis of their performance in individual subjects, on the basis of curriculum areas, or on a combination of both approaches.** Respondents believed it was important to retain individual subjects mainly because of the skills developed, and the distinct knowledge gained, by studying individual subject disciplines. They believed that assessing learners by curriculum area would devalue the qualifications, mainly because they believed that the rigour associated with individual subjects and their content could be lost. The opposite argument, in favour of greater integration of individual subjects in line with the structure of the new curriculum was noted by other respondents. Respondents also advocated the creation of a system based on the assessment of individual subjects as stand-alone components of a broader, overall measure of a learner's achievement in each curriculum area. However, this was not a widespread view and the detail of how such an arrangement would work was limited.

**Respondents believed that any revised GCSEs should prepare learners sufficiently to study subjects at A-level and beyond.** They felt this was not always perceived to be the case at present and any reform to the curriculum (including moves towards greater integration of curriculum areas pre-14) should not undermine learners' preparedness to progress to subject-specific study.

The importance of vocational qualifications was also noted in response to this question. **Respondents supported the principle of offering GCSEs in more vocational subject areas. They also said that there would be a need to increase the status of vocational qualifications, to secure parity of esteem with GCSEs in traditional subjects.**

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*‘Although they have assessed practical skills, GCSEs have not traditionally reached into wider, more vocational aspects of learning...The consultation makes clear that GCSEs will not be the only qualification available, but there is an opportunity to develop vocational GCSE qualifications. If this mixture of GCSEs is taken forward, there may be work needed to raise awareness and understanding of these changes, while retaining the strength of the brand.’*

[Public body]

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Those who supported more vocational GCSEs referred specifically to vocational subjects such as health and social care, childcare, mechanics, plumbing, and other subjects where practical skills were required.

However, **a note of caution was sounded by respondents who were concerned about the capacity of schools to offer vocational GCSEs** to learners. Respondents were concerned that there may be a lack of suitably qualified and experienced practitioners to deliver such qualifications effectively.

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*‘There are issues regarding the professional skills and knowledge required to teach such courses and the expectations and understanding of learners who study them. [There is a risk of] disengagement if learners do not have a positive experience from teachers who have the requisite professional knowledge to teach more vocational subject areas’.* [Third sector organisation]

[Third sector organisation]

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#### **4.2.2 Variation in the views of different groups of respondents.**

- Education professionals and core education stakeholders were more likely than others to offer suggestions about specific curriculum areas where reform would be needed in light of the new curriculum. Education professionals were also much more likely than other groups to make suggestions about the desirability or otherwise of maintaining the status quo.
- Core education stakeholders were more likely to mention issues relating to accessibility and the needs of particular types of learners.
- Learners were more likely to focus their suggestions on the content and design of exams and also the need for vocational qualifications.
- All groups of respondents frequently drew attention to the need for an appropriate balance between the assessment of skills and knowledge.

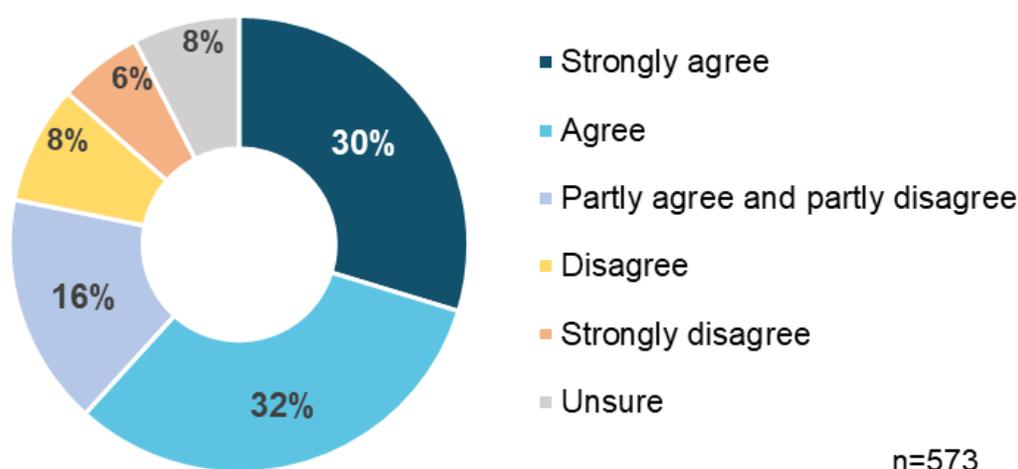
## 5. A qualification to assess wider skills

'Qualified for the future' outlined Qualifications Wales' proposal to include a specific qualification that supports the development and assessment of the wider skills defined in the new curriculum for Wales as part of the qualification offer. Respondents were asked to provide their views on this proposal.

### 5.1 A qualification that supports the development and assessment of wider skills

**On balance, we think that a specific qualification that supports the development and assessment of the wider skills (as defined in the new curriculum) should be part of the qualification offer for 16-year-olds in Wales.**

**To what extent do you agree with this proposal?**



A total of 573 respondents answered this question and 62% agreed or strongly agreed with the proposal. A further 16% partly agreed and partly disagreed with the proposal, while 14% either disagreed or strongly disagreed. A total of 297 provided written comments to support their answer (165 by those who agreed or strongly agreed; 49 by those who partly agreed and partly disagreed; 64 by those who disagreed or strongly disagreed; and 19 by those who were unsure or did not respond to the closed question).

#### 5.1.1 Support for this proposal

Among those who strongly agreed or agreed with the proposal, or otherwise expressed some level of support for the proposal, the themes raised most frequently were as follows.

**Respondents commented that any assessment of wider skills needs to be thought through in terms of the skills to be demonstrated and how they should be assessed.**

There was broad support for the notion of a means of assessing the wider skills, but a feeling that this needed to be thought through thoroughly before any changes were made. In

particular, respondents wanted more detail about how wider skills should be assessed and clarity on the status of a skills-based qualification. Respondents also called for more clarity about what would be included in a skills-based qualification and emphasised the importance for the proposal to be fully developed before implementation.

**Respondents felt that a skills-based qualification should enable learners to develop and demonstrate the skills they need for future life, study and employment.** Respondents recognised the value of the skills being taught as part of the Skills Challenge Certificate. They emphasised that the skills that learners develop are as important as the knowledge they gain from the content of a qualification. Respondents felt that a focus on developing skills through a skill-based qualification would provide continuity with the emphasis on skills in the new curriculum. They believed that the type of skills that should be developed and assessed should be broader than literacy, numeracy, and digital skills and should include:

- broader skills needed in the workplace such as problem solving and planning, creativity, and critical thinking;
- the skills young people need to lead independent lives such as managing money, first aid, practical skills, and promoting their own mental health and wellbeing; and
- the skills young people need to live as responsible citizens and to respect human rights.

Respondents advocated the use of more flexible methods of assessment alongside written exams, including assessing elements such as public speaking and producing evidence through different media, such as digital media.

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*'The wider, or employability skills, are seen, by many employers, as some of the most important skills required by future employees. It is important that they are given due recognition and, where possible, integrated in contexts in other GCSE qualifications.'* [Third sector organisation]

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**There were differing views about whether wider skills should be assessed within curriculum subjects or in a discrete qualification.** On occasion, respondents commented that skills need to be embedded in teaching and learning and that it was important that the skills-based qualification related to the other qualifications learners were pursuing. This would enable learners to develop skills in an integrated way (and in tune with the principles of the new curriculum). It would also reduce the burden of assessment on learners which some respondents believed was already excessive.

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*'We would recommend that Qualifications Wales explore how it might be possible to connect this qualification with the individual skills component of the different qualifications in some way to ensure learners see the connection between this qualification and their other learning given the ethos of the new curriculum.'* [Representative body]

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Other respondents felt that previous efforts to highlight skills within curriculum subjects had not been successful. They therefore advocated an approach where the skills were brought out and taught specifically as a discrete subject leading to a specific qualification, as they felt otherwise the skills could get lost as practitioners focused on content. They believed that this called for trained, specialist practitioners.

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*‘Any approach that would require essential skills being explicitly taught during other learning would be time consuming, confusing, potentially lead to inconsistency of delivery and be much harder to assess competence and identify and overcome possible difficulties with. Far better in my opinion, to ensure these skills are developed and tested discretely, with the requirement that they be applied and monitored as part of other qualifications, also. In this way, skills testing in other AOLEs could be applied more organically.’ [Education professional]*

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Furthermore, respondents believed that whatever approaches were adopted, it would be important that there was greater consistency in the way centres teach learners’ skills and support learners to achieve skills-based qualifications.

**Respondents emphasised that a skills-based qualification should not be structured too rigidly and there should be sufficient flexibility in how it is delivered and assessed.**

Respondents felt that it was important to give careful consideration to how it would be assessed as part of its design process. They believed there was a need to ensure that the assessment arrangements did not place an additional burden on centres, highlighting issues with current (and previous) skills-based qualifications. A separate but related point was highlighted by respondents who referred to the existing demands on the school curriculum and were concerned that skills-based qualifications could be seen as an additional pressure unless they were introduced and managed effectively.

On occasion, respondents who agreed with the notion of a skills-based qualification used the opportunity to criticise the design of the current Skills Challenge Certificate, which forms part of the Welsh Bacc. Indeed, some did not believe that the assessment of skills should form part of a Welsh Bacc in future.

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*‘Welsh Bac [sic] should be changed as it isn’t currently very relevant and takes up valuable time. We should learn about things that will actually help our future like taxes and mortgage and not creating a product. People who want to do that take business.’ [Learner]*

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### **5.1.2 Concerns regarding this proposal**

Among the minority of respondents who strongly disagreed or disagreed with the proposal, or otherwise expressed some level of concern about the proposal, the themes raised most frequently were as follows.

**It is seen as important that a skills-based qualification gains currency among all stakeholders.** Respondents who expressed this view believed that a skills-based qualification would be a meaningless qualification, of little value to learners and would stifle opportunities to pursue an alternative GCSE qualification. They believed that generic skills-based qualifications had never gained currency. Furthermore, they argued that including a distinct skills-based qualification would represent another tick box exercise that was not valued by learners and merely added to the pressures on them at 16. Moreover, some of the proposed skills were felt to be very difficult to measure and it was therefore misleading to attempt to assess them.

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*'Skills based qualifications have never really had the support of students as they are generic, and pupils can't see how they will lead on to further study. It has appeared in various forms from General studies through to the current Skills challenge, and has never had popular appeal. In my experience most pupils would rather use the curriculum time to follow another GCSE option.'*

[Education professional]

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**Respondents said that any skills-based qualification should be promoted effectively with a clear rationale about its value, purpose and content and how it is assessed.**

Respondents took the opportunity to comment on the Welsh Bacc, both in relation to the concept and the way it is structured and implemented. On occasion, respondents stated that other countries had not introduced a programme similar to the Welsh Bacc and that key stakeholders (including some Higher Education institutions) did not recognise it as being of any value.

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*'Education must be focused on getting to University or apprenticeships. A wider skills qualification will be similar to Welsh BaccaLaureate which is not accepted in many universities and ultimately draw attention away from key meaningful qualifications.'* [Learner]

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They felt that a skills-based qualification would take time and effort away from academic subjects. This view extended to some who acknowledged the value of the skills developed through the Welsh Bacc.

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*'Whilst I really value the skills and competencies that the Welsh Bac [sic] focuses on. There is no doubting that this qual [sic] is not respected and valued by many schools and even external bodies and the worry is that this baggage will follow and be attached to the "new qual [sic]".'* [Education professional]

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**There was a perception that a skills-based qualification would need to demonstrate how it adds value to the curriculum.** There was a strong view among those who strongly disagreed or disagreed with the proposal that the required skills were already being taught

through individual subjects and that a skills-based qualification would add duplication to what is already done. They were of the view that skills would be developed organically if the new curriculum was followed as intended.

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*'The development of these skills should be an integral part of all qualifications. Stand-alone qualifications for skills are the hot-beds of valueless 'gaming'. Additionally, and most importantly, pupils see them as an irrelevant encumbrance.'* [Education professional]

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**Other comments raised concerns about the portability and status (especially in England) of any skills-based qualification that only learners in Wales undertook.** Some believed that a focus on skills reduced the amount of time that could be given to subject disciplines and that this would be to the detriment of learners in Wales who had to compete with others, notably from England.

**Respondents also referred to the quality of implementation.** They believed Wales should focus its efforts on improving the implementation of the SCC, rather than developing new approaches.

**There were also concerns about the additional workload linked to a skills-based qualification.** Respondents referred to previous experiences and felt that the extent of the task of assessing all of the skills should not be underestimated.

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*'Generally in the past, where wider skills have been assessed through stand-alone qualifications, these qualifications have received poor feedback from pupils and teachers because of repetition and workload. Introducing new, specific qualifications to support the development and assessment of all the wider skills would require a significant shift in approach within the education sector.'* [Public body]

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**Respondents were concerned that the skills-based qualification could be regarded as less important or less rigorous, especially if it was assessed using NEA methods.** However, they also warned that it would be inappropriate to assess some of the skills using exams. Opportunities to assess skills in learners' main programmes of learning should not be lost.

Respondents who were undecided also believed that the Skills Challenge Certificate was not being implemented consistently across Wales and that this was an issue which needed to be addressed if a skills-based qualification were to be maintained in future.

### **5.1.3 Variation in the views of different groups of respondents.**

- Education professionals were more likely to comment on this question than other groups and to refer to the need to embed wider skills within existing qualifications.

They were also more likely to be opposed to the concept of a skills (or skills-based) qualification or to express some concern about its implementation.

- Learners were more likely to offer suggestions for specific types of wider skills which they felt should be assessed.
- All groups of respondents, apart from learners, frequently emphasised the need for any new qualification in wider skills to be carefully thought through prior to introduction, in order to ensure its success.

## 5.2 Suggestions for how the Skills Challenge Certificate could change

**Do you have any specific suggestions for how the Skills Challenge Certificate at Key Stage 4 could change to meet our vision and support the aims and purposes of the new curriculum?**

**Please explain your answer.**

### 5.2.1 Suggestions made by respondents

A total of 221 respondents provided written comments to this question. The themes raised most frequently were as follows.

**Respondents highlighted concerns about the design of the current Skills Challenge Certificate.** Many who were broadly in favour of the principle of the Skills Challenge Certificate criticised specific aspects of its implementation but **believed that it could be useful if it was revised.** They suggested this **could be done by better structuring** and felt this could lead to a more positive experience for learners. To do so they suggested:

- changing the structure of the qualification by revising the weighting placed on individual elements in the overall assessment;
- reducing the number of times a skill has to be assessed;
- introducing a broader range of activities within the Skills Challenge Certificate; and
- working to specifications that were less rigid and prescriptive.

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*'The Skills Challenge Certificate has the potential to provide young people with the experiences and opportunities to develop or refine the critical thinking and other skills important for further education and lifelong learning and support the embedding of the four purposes. However, despite many strengths, its current structure and assessment arrangements have led to repetition and overassessment of the challenges at the expense of the development of wider skills. There has been too much duplication in the Skills Challenge Certificate and pupils report that they are not always clear about the purpose of activities.'* [Public body]

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They referred to the approach adopted to deliver the Duke of Edinburgh's Award and believed this offered a model that could be adapted in Wales:

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*'Could it not be far more organic and more like a Duke of Edinburgh award where naturally established activities can be credited towards the attainment of the overall qualification. Stifled by the narrow parameters of the set challenges ... Currently many pupils lose all sense of enthusiasm for the qualification due to the repetitive nature of the challenges and the sheer volume of content.'* [Education professional]

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Alongside these comments, **respondents suggested how a Skills Challenge Certificate should be assessed and its delivery arrangements.** They noted that skills needed to be demonstrated, rather than examined, which they felt called for the use of 'live assessment' methods, where assessors work alongside a learner to identify whether, and to what extent, they have developed the requisite skills.

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*'There is a particular need to ensure that whatever shape the SCC takes, it is very different at KS4 and KS5 so that pupils don't feel they are doing the same thing all over again.'* [Education professional]

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Some respondents felt that skills should be developed and assessed throughout a learner's time in the education system and that the emphasis on Key Stage 4 in the question was unhelpful. They advocated an approach where skills are integrated and assessed at a much earlier stage.

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*'Work with KS2 and KS3 practitioners. How are/can primary and KS3 teachers introduce the values and skills needed for success in the SCC? This ensures buy in from stakeholders and that the qualification isn't perceived as a bolt on qualification in Year 9/10.'* [Education professional]

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Respondents believed there was a danger of duplication and a lack of clarity about the purpose of some assessments.

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*'The skills challenge needs to be independent of what is happening at KS4. There is a feeling at the moment that the qualification repeats much of the same content. More vocational elements should be considered with practical experiences for the young people. The workload associated with the qualification should be reduced. If the Skills Challenge is to continue in KS5, I would consider not running the qualification at KS4.'* [Local authority]  
(Translated from Welsh)<sup>14</sup>

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**Respondents emphasised that practitioners need to be provided with high-quality initial and on-going professional development opportunities.** Respondents highlighted the importance of improving initial and on-going training for practitioners, accompanied by guidance on how schools could best support learners to address the requirements of the Skills Challenge Certificate. This included identifying ways of bringing out the skills in different curriculum areas, sharing ideas about tasks that were likely to inspire and engage learners, and how to introduce a broad range of activities within the Skills Challenge Certificate in order to achieve these aims. Some respondents felt that a greater emphasis on professional development would promote more positive attitudes towards wider skills qualifications amongst practitioners and senior leaders. Respondents felt that such training would enhance the teaching and learning experience.

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*'Staff who teach the Skills Challenge need sufficient training and support in order to deliver these lessons. To some extent it is seen by some teachers as extra work in addition to their subject-related work and they don't invest in it, don't take it seriously or they see it as a burden.'* [Education professional]  
(Translated from Welsh)<sup>15</sup>

*'Teachers should be subject to more courses to be more suited for the role. More relevant life skills should be taught.'* [Learner]

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**Respondents offered specific suggestions for the skills to be included in a new skills-based qualification. They believed these skills should be defined accurately and understood by all learners.** They suggested:

- placing more emphasis on soft skills (interpersonal, communication teamwork; skills etc) that would contribute to a young person's employability;

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<sup>14</sup> Original quote in Welsh: *'Mae angen i'r her sgiliau fod yn annibynnol o'r hyn sydd yn digwydd yn CA4. Mae teimlad ar hyn o bryd bod y cymhwyster yn ail adrodd llawer o'r un cynnwys. Dylir ystyried elfennau mwy galwedigaethol gyda phrofiadau ymarferol i'r bobl ifanc. Dylai'r cymhwyster cael ei leihau o ran y pwysau gwaith. Os mae'r Her Sgiliau'n mynd i barhau yn CA5, buaswn yn rhoi ystyriaeth i beidio rhedeg y cymhwyster yn CA4.'*

<sup>15</sup> Original quote in Welsh: *'Mae angen wneud yn siwr bod staff sy'n dysgu y Her Sgiliau yn cael digon o hyfforddiant a cefnogaeth wrth dysgu y wersi yma. I rhai raddau mae'n cael eu weld gan rhai athrawon fel pwnc ychwanegol ar ben waith ei pwnc nhw ac ddim yn buddsoddu ynddo, ddim yn ystyried o ddifri neu'n weld fel burden.'*

- a stronger focus on problem solving, and application of knowledge;
- recognising practical skills;
- emphasising the skills required for independent living;
- ensuring skills are relevant to learners' own experiences and needs;
- using the skills-based qualification to promote bilingualism; and
- ensuring opportunities to develop skills outdoors as well as in the classroom.

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*'More practical life skills should be included at the age of 16 rather than work skills as the qualification is offered at A level too.'* [Learner]

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**There was also a view amongst respondents that the cross-curricular approach that underpins the new curriculum for Wales should be reflected in the way a Skills Challenge Certificate is approached.** Respondents believed that the development of the new curriculum offered an opportunity to revise the content of a skills-based qualification by creating much stronger links with the cross-cutting themes that underpin the new curriculum.

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*'The qualification has a good range of skills embedded into the course, but this could be the opportunity to scaffold the cross-cutting themes into the challenges.'* [Further education representative]

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Respondents also emphasised the importance of the skills that learners would require in adult life, in particular those needed for their future careers. They felt that learners would benefit from having an understanding of the reasons why each of the different skills were included in the qualification. On occasion, respondents, particularly learners, suggested they would benefit from learning more practical skills such as managing money and cooking as well as information and guidance about getting a job and succeeding in the workforce.

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*'Finding a job, how to apply and how to handle the interview. How to handle being put down. Making a business or how to work for a business. What the building blocks are, etc.'* [Learner]

*'Make the skills more practical. Invest in relative life skills for the future. Bring in specific teacher who teaches these lessons.'* [Learner]

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More broadly, they called for a wider variety (and more interesting) topics to be included.

**High-quality implementation was also seen as essential for the successful delivery of a skills-based qualification.** Respondents emphasised the need for high-quality implementation of any skills-based qualification to be a primary consideration.

Respondents advocated encouraging schools to be outward-looking when implementing the Skills Challenge Certificate, by engaging with employers and other stakeholders in the community to identify opportunities for learners to develop their skills.

### **5.2.2 Variation in the views of different groups of respondents.**

- Education professionals were most likely to advocate getting rid of the qualification.
- Learners were less likely to offer suggestions for this question.
- All groups of respondents felt that the Skills Challenge Certificate needed to be reformed and would benefit from better implementation.

## 6. Views on the Integrated Impact Assessment

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Qualifications Wales published an Integrated Impact Assessment alongside 'Qualified for the future'. Respondents were asked to provide views on the impacts that Qualifications Wales had identified, including any impact on the Welsh Language and individuals or groups with protected characteristics.

### 6.1 Regulatory impacts

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Three questions were asked about the regulatory impacts Qualifications Wales had identified. There were a relatively low number of responses to each of these questions and the themes raised were broad. Consequently, there were limited distinct variations in the views by different groups of respondents for these three questions.

**Are there any further regulatory impacts that may arise from any of our proposals? If so, please explain your answer.**

A total of 73 respondents provided written comments to this question. However, of these, 28 stated that they either did not think there were any further regulatory impacts that may arise from any of the proposals or that they were not sure. Therefore, 45 comments have been analysed and the themes raised most frequently were as follows.

**Respondents felt that it is important to consider the impact of the proposals on under-represented groups of learners.** Respondents made particular reference to certain groups of learners, such as learners that are 'seldom heard' and disabled learners. It was acknowledged that equality would be addressed within the proposals, but that there needs to be more transparency in the term 'reasonable needs' of all learners as this is too vague.

**A concern was raised that gaps in provision could potentially appear if qualifications are removed, with no alternative available.** In particular, respondents who raised this communicated two concerns: firstly, that gaps may appear if individual qualifications are no longer available; and secondly a concern that some individual subjects would no longer be available separately but only combined as areas of learning and experience.

**Respondents also commented that centres should be able to access GCSE qualifications from a number of different awarding bodies.** They suggested that lack of access to awarding bodies other than WJEC limits the GCSE qualification options available.

**Are there any additional steps we could take to reduce the regulatory impact of any of our proposals? If so, please explain your answer.**

A total of 58 respondents provided written comments to this question. However, of these, 23 stated that they either did not think there were any additional steps that could be taken to reduce the regulatory impacts of any of the proposals or that they were not sure. Therefore, 35 comments were analysed and covered a wide variety of themes. Those raised most frequently were as follows.

**Respondents emphasised that it is important that there is effective communication throughout the process of implementing the proposals to ensure that everyone is aware of the changes and the qualification options available.** A lack of full transparency would lead to a lack of confidence in the system. Respondents suggested that raising awareness and ensuring full and effective communication would help to achieve this transparency.

**They also felt that consultation with key groups, including practitioners, parents, learners and other key stakeholders, when more detailed proposals are developed.** For example, it was noted that all key stakeholders, specifically employers, should be included in the design stage when making changes to GCSE specifications/assessments.

**Sufficient time was seen as important in order for the necessary preparations to be undertaken by centres and practitioners to respond to implementation of proposals.** For example, respondents placed an emphasis on the importance of making approved content for GCSE qualifications available 12 months prior to first teaching of the qualifications. This would allow practitioners a 12-month period to develop resources for the delivery of these qualifications.

**Respondents also commented that sufficient funding would be required to enable the successful implementation of any proposed new qualifications.** This funding would be particularly important to enable the education workforce to receive sufficient professional development in order for new qualifications to be successfully implemented.

**Do you have any other comments on the regulatory impact of these proposals? If so, please explain your answer.**

A total of 46 respondents provided written comments to this question. However, of these, 28 stated that they either did not think there were any additional steps that could be taken to reduce the regulatory impacts of any of the proposals or that they were not sure. Therefore, once these comments were removed, 18 comments to this question remained. These comments cover a wide variety of themes, so themes identified from this limited number of responses were often only raised by one respondent. Several of these identified themes had already been raised through respondents' answers to the previous questions relating to regulatory impacts. Therefore, only new points raised by respondents are summarised below.

**Respondents raised a concern about the added workload that the implementation of the proposals would bring to centres and practitioners.** It was suggested that in order for the new curriculum to be a success, those required to implement it would need a sufficient amount of support to do so.

It was suggested that **Welsh must be incorporated as a skill in any new qualification** as this would help to ensure that learners have the opportunity to develop their Welsh-language and bilingual skills in the same way as literacy and numeracy skills.

**It was suggested that ensuring competency in the delivery of Welsh-medium qualifications would be a challenge** (respondents did not provide further detail on the competency required).

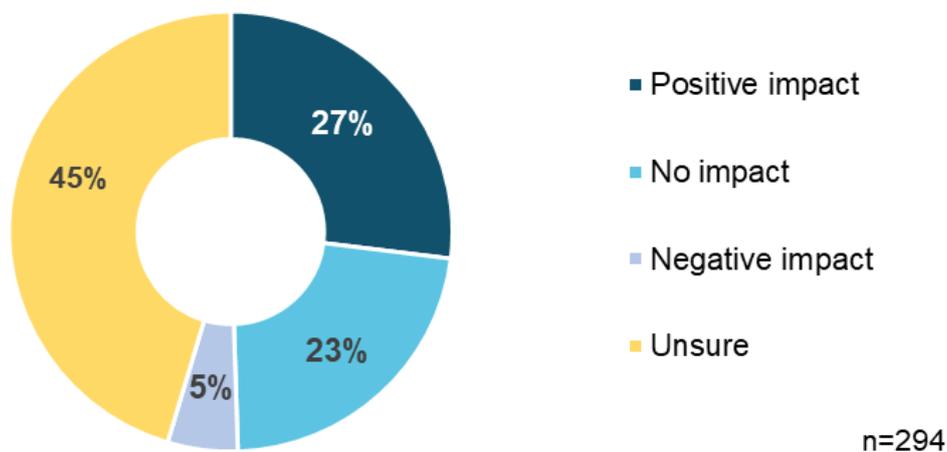
**There was a perception that the level of trust in centres to accurately assess and record marks would affect the impact of moderation requirements.** It was explained that the greater the trust placed on centres to accurately assess and record marks, the less the impact of moderation required each year.

## 6.2 Impacts on the Welsh language and equalities

Two Welsh language impact questions were asked. The responses to the closed questions are presented here. The frequently raised themes for the two questions are presented together, as there was overlap in the content of the submitted responses.

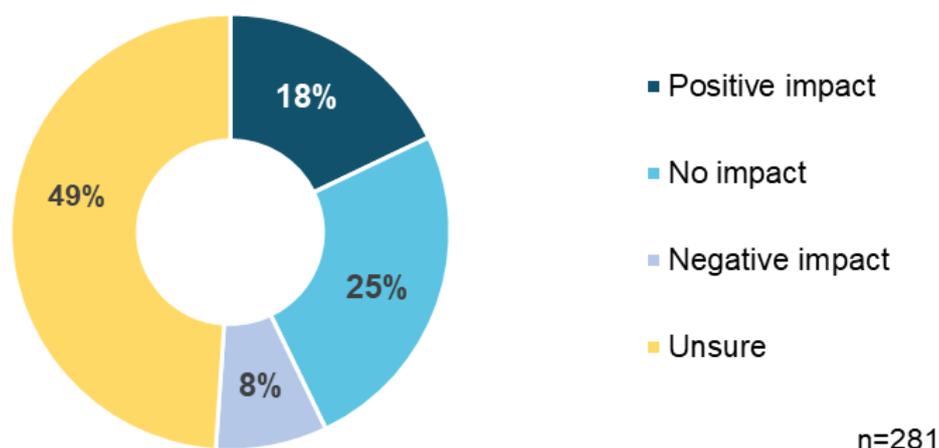
There were a relatively low number of written comments in response to each of these questions and the themes raised were somewhat broad. Consequently, there are limited distinct variations in the views of different groups of respondents for these questions.

**Would any of our proposals result in any other positive or negative impacts (intended or unintended) on opportunities for people to use the Welsh language?**



A total of 294 respondents answered this question; 27% said there would be a positive impact on opportunities for people to use the Welsh language, 23% said there would be no impact and 45% were unsure whether there would be an impact. A total of 80 provided written comments to support their answer (25 by those who said there would be a positive impact; 11 by those who said there would be no impact; 14 by those who said there would be a negative impact; and 30 by those who were unsure or did not answer the closed question).

**Would any of our proposals result in any other positive or negative impacts (intended or unintended) in relation to treating the Welsh Language no less favourably than the English Language?**



A total of 281 respondents answered this question; 18% said there would be a positive impact in relation to treating the Welsh Language no less favourably than the English Language, 25% said there would be no impact and 49% were unsure whether there would be an impact. A total of 54 respondents provided written comments to support their answer (13 by those who said there would be a positive impact; 4 by those who said there would be no impact; 15 by those who said there would be a negative impact; and 22 by those who were unsure or did not answer the closed question).

The themes below reflect respondents' comments in relation to the two closed questions above on the Welsh language. It is important to note that the following themes were those raised most frequently by a limited number of respondents.

**Respondents said that having all qualifications available bilingually would ensure all learners have access to a wide range of qualifications.** Respondents emphasised the positive impact that this would have on opportunities available for learners to use Welsh, which would strengthen the current arrangements.

**They also felt that the proposals would help to secure the future of the Welsh language and ensure that the Welsh language was treated equally to English.** The language would have greater visibility, which would contribute to the Welsh Government's target of one million Welsh speakers by 2050.<sup>16</sup> There could also be an increase in the proportion of learners taking qualifications through the medium of Welsh in the future.

**There was also a view that having the opportunity to take qualifications in Welsh would impact positively on learners' attitude towards Welsh.** Learners who learn Welsh through school may enjoy the experience of learning new skills and their attitude would be positive

<sup>16</sup> Welsh Government (2017), *Cymraeg 2050: A million Welsh speakers*

towards the language in education and they would promote Welsh beyond school. Thus, such experiences would broaden opportunities for learners to speak Welsh.

**Having bilingual provision as a goal from the outset was seen as more effective** than trying to ‘retro-fit’ the Welsh language into the production of resources, for instance. It was also proposed that any ‘commercial aspects of delivery’ would need to be monitored carefully. The respondent did not provide any clarification regarding these commercial aspects. Respondents also commented that learners could be disadvantaged if Welsh language resources are lacking in availability and quality.

**There was also a perception that until more practitioners are able to deliver through the medium of Welsh, the impact on the growth of the Welsh language would be minimal.** A perceived variation in the quality of Welsh-medium teaching was also cause for concern. It was suggested that having more bilingual primary schools would help to secure the future of the Welsh language.

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*‘The only way to ensure that everyone in Wales can speak Welsh, whether they choose to do so or not once an adult, is to have bilingual primary schools. The current tokenistic approach puts secondary learners off Welsh for life and reduces the numbers choosing MFL [Modern Foreign Languages].’*  
[Education professional]

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**Respondents commented that if the proposals are implemented, learners would be able to be assessed in the language of their choice** and fulfil their right to use the Welsh language. If qualifications were not available in Welsh, this would negatively impact the opportunities for learners during compulsory education. Respondents also commented that the system must ensure inclusivity and not limit learners to a single language, with qualifications designed with the Welsh language in mind from the outset.

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*‘The commitment to giving ‘learners the choice to learn in Welsh and English’ should mean all qualifications are planned and written with the Welsh language at the heart of the design. This will support students with their right in using their Welsh language. Should qualifications still be made available that are not bilingual, this will limit Welsh speaking students opportunities to further develop their language skills throughout their compulsory education.’* [Further education representative]

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**Respondents also highlighted some practical issues or concerns**, such as the capacity for more schools to teach in Welsh and for awarding bodies to deliver qualifications in Welsh. Similar concerns relating to the capacity of awarding bodies were raised in response to Principle 2 (section 3.2). Others also raised the need for more resources in Welsh to support learners and teachers. It was perceived that issues could arise if candidate work is translated prior to marking as opposed to being marked in the original language.

**Respondents also commented on the financial implications of treating English and Welsh equally**, with an importance placed on the need to reduce the duplication of resources. Respondents commented that there needed to be equal funding for English and Welsh. However, whether awarding bodies could produce the full range of qualifications bilingually was a concern as there would be an impact on opportunities for learners if awarding bodies withdrew some qualifications.

In addition, respondents suggested that awarding bodies based in England may not provide qualifications in Welsh, due to difficulties sourcing bilingual subject experts and examiners.

**Although respondents perceived that there could be a positive impact if all qualifications were available in Welsh**, it was noted that Qualifications Wales need to ensure that there would be an ‘absolute policy’ to do this, with increased grant funding to make it viable for awarding bodies to offer the qualifications. Respondents raised concern about the caveat which stated that there may be circumstances where exceptions to this principle may be required. Yet, overall, the offer should not undermine learners’ equal rights.

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*‘It is not clear what the purpose is to create core principles for shaping new qualifications, but also to note that there will be circumstances where these principles are to be ignored.[...]. The consultation document refers to the possibility of using grant funding to support the initial costs for an awarding body of making a qualification available through the medium of Welsh. We believe that the Welsh Government should increase the grant funding available for this, and ensure that it is sufficient to make it financially viable for awarding bodies to offer qualifications bilingually. If this is not possible then we do not consider that the qualification should be offered in Wales. We believe that the aspiration to offer a broad and balanced range of qualifications to learners in Wales should not be fulfilled at the expense of ensuring equality for Welsh-medium pupils.’ [Commissioner]*

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**There was also a perception that the drive for all qualifications to be available in Welsh in order to receive public funding may result in fewer specialist qualifications** being offered in Wales, as some may not be available in Welsh. It was perceived that this could result in skill shortages, as well as implying that the Welsh language is less important than the English language in this context.

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*‘Your drive to ensure that only qualifications which are deliverable in Welsh can attain public funding would ensure that fewer specialist qualifications are pursued in Wales. This will lead to skills shortages in specialist areas. This would lead to either those jobs moving outside of Wales, or the requirement to recruit from outside of Wales for those positions. This will not enhance any quality or quantity of Welsh speaking, if such a thing were desirable.’*  
[Parent/carer]

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However, there appeared to be some confusion about what ‘publicly funded’ meant and whether centres would be allowed to deliver qualifications offered by awarding bodies other than WJEC.

**Implications for progression were also noted by respondents who felt there was potential for improved progression for those learners taking qualifications through the medium of Welsh.** Respondents believed that this could lead to further study or training opportunities in Welsh, which would ultimately benefit individuals and society. Such opportunities for post-16 study through the medium of Welsh would need to be assured. However, there was also a perception that opportunities for studying through the medium of Welsh at higher education institutions are lacking, which could limit the impact of bilingual qualifications at 16.

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*‘The adoption and implementation of [this] principle could have a positive impact on learners’ ability to take qualifications in subjects through the medium of Welsh. As a result, progression routes in Welsh would be opened, possibly into further studies or training - and then possibly to jobs where ‘subject’ skills and Welsh language skills would be used to the benefit of those individuals, and the wider society.’*  
[Teaching Union] (Translated from Welsh)<sup>17</sup>

*‘Ensuring that all qualifications are available through the medium of Welsh should make study and assessment through the medium of Welsh easier and hopefully more attractive to learners. This could lead to a rise in the number of learners taking qualifications through the medium of Welsh in the future. We need to ensure that they then have the opportunity to continue to do so in any future post-compulsory education and training.’*  
[Third sector organisation]

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**Respondents also raised themes which are outside the remit of Qualifications Wales’ responsibility or the consultation.**

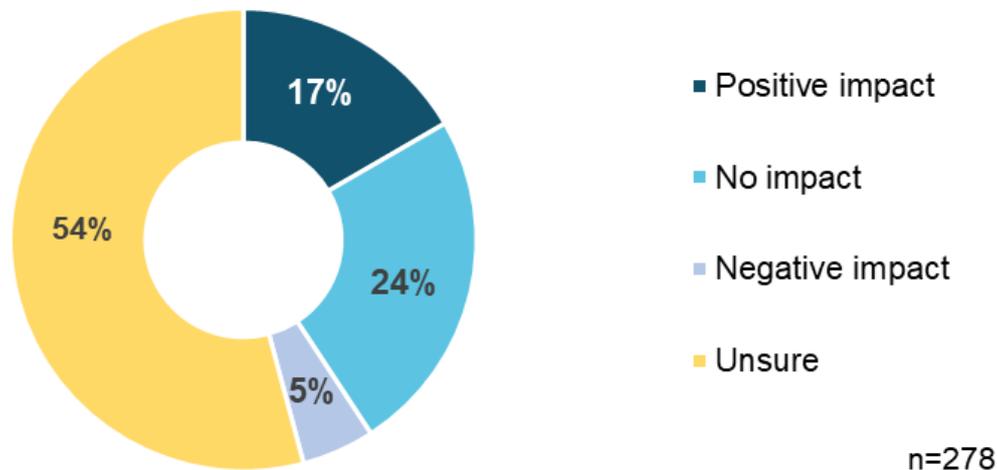
- **They felt that compulsory Welsh delivered up to 16, and the opportunity to take Welsh-medium qualifications, help to address the language needs of the workplace in Wales.** However, there was a view that the lack of employment opportunities in Wales compared to other UK regions had resulted in difficulties retaining a Welsh-speaking workforce.

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<sup>17</sup> Original quote in Welsh: ‘Gallai mabwysiadu a gweithredu Egwyddor 2 ‘Cymwysterau sydd ar gael yn ddwyieithog’ gael effaith gadarnhaol ar allu dysgwyr i ddewis sefyll cymwysterau mewn pynciau drwy gyfrwng y Gymraeg. O gan ganlyniad i hynny, byddai llwybrau dilyniant yn y Gymraeg yn cael eu hagor, ymlaen o bosib i astudiaethau neu hyfforddiant pellach - ac o bosib wedyn i swyddi ble byddai’r sgiliau ‘pynciol’ a’r sgiliau Cymraeg yn cael eu defnyddio er budd yr unigolion hynny, ac i’r gymdeithas yn ehangach’

- **Although respondents highlighted the clear advantages to learning the Welsh language**, it was also stressed that there needed to be a focus on English literacy standards, to ensure learners in Wales can compete with others on an equal footing.
- **There were concerns that pressure on the timetable could result in less time allocated to Welsh** if the ‘wider skill’ qualification is delivered. If the Welsh Second Language qualification is removed, this could disadvantage learners, who would become demotivated and the commitment to using Welsh would decline. It was also noted that if aspects of Welsh culture and history were integral to lessons, a sense of being Welsh and motivation to learn the language would be encouraged.
- **They felt that there could be a negative impact on job opportunities for non-Welsh speaking practitioners.** Respondents highlighted a perception that practitioners could relocate across the border due to their limited Welsh; concern was also raised regarding the impact on skilled foreign professionals who may avoid Wales.

**Would any of our proposals result in any other positive or negative impacts (intended or unintended) for individuals or groups who share protected characteristics outlined within the Equality Act 2010?**



A total of 278 respondents answered this question; 17% said there would be a positive impact for individuals or groups who share protected characteristics, 24% said there would be no impact and 54% were unsure whether there would be an impact. A total of 46 respondents provided written comments to support their answer (12 by those who said there would be a positive impact; 2 by those who said there would be no impact; 10 by those who said there would be a negative impact; and 22 by those who were unsure or did not answer the closed question).

Therefore, it is important to note that the following themes were raised most frequently by a very limited number of respondents.

**Respondents felt there would need to be a broad choice of qualifications offered, including vocational qualifications, to allow equal access for those who share protected characteristics.** In doing so, the needs of all learners would be met by the range of qualifications available at different levels.

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*‘Provision of a broader range of opportunities for all, with a wider and more inclusive curriculum, is a positive feature for all.’*  
[Regional education consortium]

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**Respondents commented that the proposals would ensure inclusivity and acceptance.**

Respondents noted that learners from different backgrounds would be able to exercise their freedom of choice and realise their full potential. Respondents also commented that this approach is in line with the ethos of the new curriculum and recognises that some learners need more time or support to fulfil their potential.

**Respondents expressed a view that effective inclusivity requires active engagement with all key stakeholders.** It was perceived that this would allow for the needs of all to be considered, which would support achievement. In particular, there was a perception that the consultation lacked attention to learners with special educational needs, with respondents noting that groups with protected characteristics must be involved in all future discussions, and recognition of diversity in practice acknowledged.

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*‘For instance, the principle of ‘equitable and coherent’ will need careful interpretation. What seems ‘equitable’ for one group may not, in practice, be equitable to another.’* [Third sector organisation]

*‘The suite of qualifications must strive to create an inclusive learning and working environment that supports good relations between people and challenges prejudice, intolerance and discrimination in all its forms. To ensure this Qualifications Wales must actively engage with all key stakeholders on key matters related to equality and diversity.’*  
[Further education representative]

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**Respondents emphasised that provision for ALN learners must be assured,** with qualifications accessible to all. Respondents commented that accessibility would need to be at the forefront of qualification design and delivery. If the number of qualifications is reduced, accessibility must be ensured. A low take-up for a qualification must not be interpreted as a lack of need. The needs of ALN learners must be safeguarded when determining whether to continue to make qualifications available.

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*‘If certain qualifications are more heavily undertaken by groups with protected characteristics, they should not be removed on the basis of low take up.’* [Third sector organisation]

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**Accessibility was considered by respondents to be vital when testing learners' essential and wider skills;** all learners must be given the opportunity to demonstrate and develop skills, no matter what their background/socio-economic context. Respondents also commented that the language preference of learners needs to be taken into account.

**Respondents commented that all qualifications need to be achievable** and there must be due consideration for learners from lower income backgrounds and different ethnic groups including those for whom English is not the home language, and Gypsy, Roma and Traveller learners.

**There was also a view that the level of impact of any of the proposals is difficult to comment on at this early stage** as it would depend on the assessment methods applied. Any impact assessment completed would need to examine whether all learners, including those from lower socio-economic groups and others not included under protected characteristics, such as Pupil Referral Units and Education otherwise than at school (EOTAS) settings, including those with British Sign Language (BSL), would be negatively impacted by the proposals to reduce the range and number of qualifications. Respondents also noted that the impact assessment needs to be ongoing, following the implementation of the proposals. Engaging with learners about the proposals was also seen as critical for effective implementation.

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*'At this early stage it is unclear if there will be positive or negative impacts for some groups of learners. It is important a suite of qualifications is developed that must engage all groups of learners. We must remember the age group 14-16 are 'teenagers' and engaging them is vital if they are to thrive and develop the four purposes.'* [Education professional]

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**Concern was also raised that non-Welsh speakers, both staff and learners, must not be disadvantaged by the proposals.** The language of the setting should be chosen according to the dynamic of its staff and learner; they should be free to adopt the language of their choice.

There was also a view that when designing future qualifications, **human rights education needs to be considered** to ensure Wales fulfils its international and domestic human rights obligations.

**Respondents also raised themes which are outside the remit of Qualification Wales' responsibility or that of the consultation.**

- **They expressed concern that the new curriculum could increase the attainment gap,** harming those in lower socio-economic groups and other learners not included under protected characteristics (e.g. learners in Pupil Referral Units and EOTAS, including those with BSL as their first language).

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*‘The gap between non-efsm [Eligible for Free School Meals] and efsm learners has a strong possibility of being affected as the absence of clearer guidelines on content could result in many pupils having vital gaps in their knowledge of ‘cultural capital’, which more privileged pupils may gain from their home life environment.’ [Education professional]*

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- **They also expressed concern that if subjects are withdrawn, this could negatively impact learner well-being.** Specific religious communities could be disadvantaged by the change in the approach to religious education. Any integrated content in the new curriculum could result in issues arising regarding religious education content in faith centres.
- **Respondents also emphasised that funding would be needed to provide suitable support,** as integration in the learning environment is important; any new curriculum products and models need to ensure this.

## 7. Further comments

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Respondents were asked to share anything else they had to say about the information outlined in 'Qualified for the future'.

**If you have anything else you would like to say about the information outlined in this consultation document, please use the space below.**

A total of 109 respondents provided further written comments about the information outlined in the consultation. Respondents raised a wide variety of themes, some of which reflect or re-emphasise themes raised earlier in the consultation. Due to the broad nature of the themes raised and the relatively low number of responses (particularly from certain groups of respondents), there were limited distinct variations in the views of different groups of respondents.

**Respondents expressed generally positive views on the consultation process or its content.** This included expressing general, overarching support for the principles and proposals set out in the consultation and general satisfaction with being given the opportunity to contribute to the consultation.

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*'[Our organisation] welcomes the opportunity to respond to this consultation and is very supportive of the overall direction of travel. The underpinning of future changes to qualifications by a set of agreed principles is a strength and we look forward to engaging constructively with Qualifications Wales in the future work.'* [Education professional]

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**During the ongoing consultation and reform process, respondents felt it would be important to engage with a wide variety of stakeholders.** This would include providing ongoing opportunities for respondents themselves to continue to contribute to qualifications reform (including opportunities for dialogue). Respondents also emphasised the need to ensure that the views of a range of key stakeholders (such as education professionals, learners, employers and work-based learning providers) are used to inform any qualifications reform. In addition, respondents noted that effective communication with key stakeholders is important, to ensure that stakeholders fully understand any proposed changes to qualifications.

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*'Given qualifications are part of the preparation for working lives, we would repeat the importance of ensuring that the employer voice from employers large and small from across public, private and third sector are heard and inform the development of qualifications.'* [Representative body]

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**Respondents believe it would be vital that any qualifications reform maintains the currency and comparability of qualifications taken at 16 and facilitates post-16 progression.** Respondents took this opportunity to emphasise that qualifications at 16 should

support learners to move to subject-specific study at further or higher education level, as well as ensuring that they are comparable with those offered outside Wales. Respondents expressed concern that learners would be disadvantaged if qualifications taken at 16 do not directly relate to post-16 education requirements and employer expectations.

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*'Whilst degrees and A2/AS level qualifications are not considered for radical change, the GCSE assessment system must not be radically altered either, as each platform is a stepping stone to the next. Children in Wales who wish to pursue academic subjects could be drastically left behind, particularly those from more disadvantaged backgrounds, if GCSE courses and qualifications are not rigorous or subject specific enough to successfully pursue these areas at higher education level.'* [Education professional]

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**The amount of reform currently underway in the education sector was seen as highly challenging by respondents; sufficient time and training, and careful timetabling of reform is needed to reduce the burden placed on education professionals.** Respondents expressed concern that the education system – and education professionals themselves – would struggle to adapt to all the curriculum and qualifications reform occurring in Wales. Education professionals and those responsible for marking, exams and assessment processes need additional time and training to make adaptations. In addition, careful consideration must be given to how the timing of qualifications reform would dovetail with curriculum reform. On the one hand, the amount of change (after the recent reform of GCSE specifications) is highly challenging for education professionals but on the other, the first cohort of learners would still be working towards existing qualifications unless there is an appropriately-timed amendment to qualifications.

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*'[Our organisation] wishes to highlight the fact that the proposed changes to the qualification framework will be being introduced during a period of major change within the education sector in Wales. Other changes and initiatives, including the National Mission and preparations for the introduction of the new curriculum, are already placing significant demands on staff (and their workloads) throughout the sector. It will therefore be essential for Qualifications Wales to ensure that sufficient lead-in time is provided for the proposed changes, in order to ensure that education professionals are able to properly prepare.'* [Regulator]

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**Respondents also said that qualifications reform must not lose sight of the ultimate objective of achieving the best possible outcome for learners.** Any reform must be deemed necessary to achieve the best outcomes for learners and, as such, decisions on qualifications should be driven by this principle. Respondents raised this theme in relation to ensuring that qualifications reform doesn't fall by the wayside, but it was also raised by those who expressed concern about the necessity of such wide-ranging curriculum and qualifications reform.

**There was also a view amongst respondents that assessment methods need to be reviewed alongside changes to qualifications.** Respondents identified the need to consider how assessment methods could or should be reformed alongside qualifications reform. This included consideration of how qualifications would relate to and reflect progression steps, how assessment through progression steps would be reflected in post-16 assessment, how and whether digital assessment methods should be considered and whether there is scope for qualifications to place a greater emphasis on coursework, rather than exams.

**Respondents believed there is an opportunity to make significant changes to the education system in Wales, particularly by addressing existing shortcomings.**

Respondents identified an opportunity for qualifications and curriculum reform to be aspirational, transformational and creative, although noted that such reform would require a concerted effort by all key stakeholders and a significant amount of hard work. Respondents emphasised that simply reverting to previous curriculum and qualification structures due to a lack of ambition and leadership must be avoided.

**A range of other themes were raised less frequently by respondents including:**

- expressions of concern regarding, or criticism of, the consultation process;
- the importance of addressing – and suggestions on how to address – the development of wider skills amongst learners, including careers knowledge;
- the need to maintain core elements of qualifications, particularly subject-specific knowledge and specialist practitioners; and
- qualifications taken at 16 are seen to drive the content, teaching practice and assessment methods of the curriculum, causing stress for young people, and this issue must be addressed.

## 8. Next steps

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Alongside this analysis of consultation responses, Qualifications Wales has published a separate document detailing its decisions on how it will shape the future qualifications that can be publicly funded for 16-year-old learners in Wales. In reaching its decisions, Qualifications Wales has considered all responses to the consultation.

Qualifications Wales' decisions document is available to read online.<sup>18</sup>

Having decided on the key aspects of its approach, Qualification Wales' next task is to consider the future range of qualifications for 16-year-olds that should be available.

At the end of this year, Qualifications Wales will consult on proposals for:

- The qualifications that should form part of the future offer for 16-year-olds. This will include proposals for the whole range, including GCSEs and other qualifications. Qualifications Wales will also ask about when any necessary changes should be made and in what order of priority.
- What future GCSEs should look like. The subject areas they can be offered in, as well as the type of content and assessments they should include. Qualifications Wales will also ask about when and in what order to make any changes.
- The qualifications required to support the single continuum for teaching and learning Welsh. Here again, Qualifications Wales' proposals will cover what changes may be required as well as how and when those changes should be made.

Over coming months, Qualifications Wales will continue to work with stakeholders to develop and refine a set of clear proposals for consultation.

The consultation on the proposals listed above will close in early 2021. Qualifications Wales will confirm its decisions in summer 2021 before launching a further round of consultations in autumn 2021 to agree the detailed design of any new or updated qualifications.

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<sup>18</sup> <https://qualificationswales.org/media/6019/our-decisions.pdf>