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Foreword

Since Welsh Government announced the new [Curriculum for Wales](#), which aims to give learners more opportunities to succeed through a broad and balanced education, we knew we had to start a wider conversation on how qualifications for 14 to 16-year-olds should look.

After consulting with 1,500 learners, parents, teachers, lecturers, and employers in early 2021, we set out our vision for future qualifications in our [decisions report](#) which was published last October. However, we decided to reserve our decisions on Welsh language qualifications, so that they could be considered alongside the Welsh Government's Welsh language policy intentions. Following that review, we're now able to announce our decisions on the Welsh language qualifications that will be available for first teaching from 2025.

We believe these new Welsh language qualifications will give learners a fair and equal opportunity to achieve in Cymraeg, regardless of which type of school they attend. We will be working with schools, colleges and others as we look to co-create these new Welsh language qualifications and plan what they should look like in terms of content, design and assessment.

We want all learners to be confident users of Cymraeg within a continuum for Welsh language learning, which includes learners with little or no language experience right through to those who are proficient in the language. Welsh language qualifications for learners in English-medium settings have developed significantly in the past five years, with expectations already having been raised in the revised GCSE introduced for first teaching in September 2017.

The changes outlined from 2025 are a major step forward as we strive to create a fully bilingual nation. We also recognise the need to continue to develop and adapt and change these qualifications over the next decade, as we work with other partners and stakeholders in Wales to collectively pursue the ambitions of [Cymraeg 2050](#) and ultimately the aim of a single qualification for all learners in Wales.



David B Jones OBE DL
Chair, Qualifications Wales



Philip Blaker
Chief Executive, Qualifications Wales

1. Our decisions in summary

- 1.1. This report explains our decisions in relation to future Welsh language qualifications to be available for 14–16-year-olds.
- 1.2. We will create a set of three new Welsh language qualifications as follows:

Decision 1: We will combine language and literature and create a new integrated GCSE in Welsh for learners in Welsh-medium and bilingual schools.

Decision 2: We will discontinue GCSE Welsh Second Language and create a new GCSE for learners in English-medium settings.

Decision 3: We will create a new additional qualification for learners in English-medium settings who are ready to progress further and more quickly in their Welsh language skills.
- 1.3. We will be taking all three of these qualifications forward to the next stage, which will entail working with stakeholders to develop minimum qualification requirements.

2. Background to our decisions

- 2.1. Between 27 January and 16 April 2021, we consulted on the future range of subjects in which brand new GCSEs and related made-for-Wales qualifications should be created.
- 2.2. This was the second in our series of consultations called *Qualified for the Future* to agree the next generation of qualifications for learners aged 14 to 16 in Wales.
- 2.3. The consultation included proposals within the Languages, Literacy and Communication Area of Learning and Experience which specifically related to future Welsh language qualifications. These were:
 - **Proposal 1:** Create a new combined language and literature GCSE in Welsh to replace the existing separate GCSE qualifications. This new combined GCSE would be roughly the size of one and a half GCSEs. This proposal mirrored our approach to creating a new combined language and literature GCSE in English.

- **Proposal 2:** Discontinue GCSE Welsh Second Language and create a new, bigger GCSE designed for learners in English-medium settings that reflects the expectations of the Curriculum Guidance. The new qualification would be roughly the size of one and a half GCSEs.
 - **Proposal 3:** Create a set of small Welsh language skills qualifications that can be taken in addition to a GCSE to support progression along the continuum for Welsh language learning.
- 2.4. In October 2021, we published our consultation decisions for the range of GCSEs and other related made-for-Wales qualifications. Taking account of the consultation responses, we decided to implement most of those we set out in the consultation. However, after careful analysis, we decided to reserve our decisions in relation to Welsh language qualifications until early 2022. This was to allow time for a further review of the proposals alongside other potential options informed by the Welsh Government’s policy intentions for a single language continuum for teaching and learning Welsh (‘Welsh language continuum’) as part of curriculum implementation or any wider policy work.
- 2.5. Our proposals for Welsh language qualifications attracted a range of different views and differing levels of support. This was particularly the case for the proposals relating to qualifications in English-medium settings. It was clear that there were divergent views among those who disagreed with our proposals. We concluded that revisiting all the options available to us for Welsh in English-medium settings was the most appropriate course of action.
- 2.6. Given that our decisions relating to Welsh in English-medium settings could impact what we ultimately decided to do in relation to qualifications for Welsh-medium and bilingual settings, we deferred on all three proposals.
- 2.7. Since then, we have continued to explore the options for future Welsh language qualifications. This has included conducting a detailed impact assessment and holding further discussions with the Welsh Government to ensure the decisions we make align with its policy direction for the Welsh language.

2.8. We have also continued to engage with a range of stakeholders including:

- Coleg Cenedlaethol Cymraeg
- CYDAG
- Cymdeithas yr Iaith
- Estyn
- Higher education representatives including ITT departments
- Learners
- Regional Education Consortia
- School leadership teams
- The Seren Network
- Welsh Government
- Welsh Language Commissioner's Office
- Welsh language practitioners from English-medium settings
- WJEC

2.9. As a result of this work, we have arrived at the decisions that are presented in this document.

3. The wider context

3.1. The Welsh Government wants to see more learners leaving compulsory education as confident users of the Welsh language and has set out its vision in its Welsh language strategy, Cymraeg 2050: A million Welsh speakers.

3.2. Achieving this vision will require a range of interventions across education policies. This includes a legislative commitment to strengthen and increase Welsh language education provision to move schools along the language continuum and to develop a growing workforce able to teach Welsh and teach through the medium of Welsh.

3.3. We have been clear from the outset that we support and are fully committed to contributing to the Welsh Government's national strategy. As we said in the consultation, decisions about which qualifications to offer and how they should be designed and assessed can help contribute to a national approach aimed at increasing the number of Welsh speakers.

- 3.4. We know that Welsh language qualifications need to change; this must be curriculum-led. The Curriculum for Wales Guidance ('Guidance') for the Languages, Literacy and Communications Area of Learning and Experience ('Area') introduces the concept of a Welsh language continuum. It includes a separate set of expectations (expressed as 'descriptions of learning') for the progress learners are expected to make in their Welsh language learning if they are studying in English-medium settings. This reflects the different pace at which learners can be expected to develop their language ability depending on whether they receive most of their education through English or Welsh. There is a clear relationship between the two sets of expectations allowing learners to progress along a single Welsh language continuum.
- 3.5. The Guidance reflects the fact that it would be difficult for learners in English-medium settings to achieve the same linguistic level as learners in Welsh-medium or bilingual settings as they have less exposure and contact with the language. While the boundaries between different education settings in Wales are softened, the Curriculum for Wales nevertheless recognises and reflects the differences which remain between Welsh-medium and English-medium settings.
- 3.6. It is in this context that we explored the question of how a Welsh language continuum, which sets different expectations and learning outcomes for learners depending on their setting, should be reflected in qualifications.
- 3.7. As part of our decision-making, we considered a number of models and structures. In the consultation we specifically discussed the possibility of a new overarching GCSE qualification to replace the existing GCSE Welsh Language and GCSE Welsh Second Language qualifications. In doing so, we explained the reasons why it would not currently be possible to design a single qualification that could fairly and reliably assess all learners in all settings. The degree of difference between the curriculum expectations for learners in English-medium settings and for those in Welsh-medium and bilingual settings is too great to be encompassed within a single qualification.
- 3.8. Since the consultation we have worked with the Welsh Government to ensure the decisions we make are consistent with its policy aims for the Welsh language.

- 3.9. We remain committed to working towards our longer-term ambition of introducing one Welsh language qualification for all learners.

4. Our decisions

- 4.1. We have re-appraised all the options and decided on the future Welsh language qualifications that should be developed and made available for 14-16-year-olds.

- 4.2. We will create a set of three new Welsh language qualifications to align with the Curriculum for Wales and reflect the continuum for teaching and learning Welsh. The qualifications are as follows:

Decision 1: We will combine language and literature and create a new integrated GCSE in Welsh for learners in Welsh-medium and bilingual schools.

Decision 2: We will discontinue GCSE Welsh Second Language and create a new GCSE for learners in English-medium settings.

Decision 3: We will create a new additional qualification for learners in English-medium settings who are ready to progress further and more quickly in their Welsh language skills.

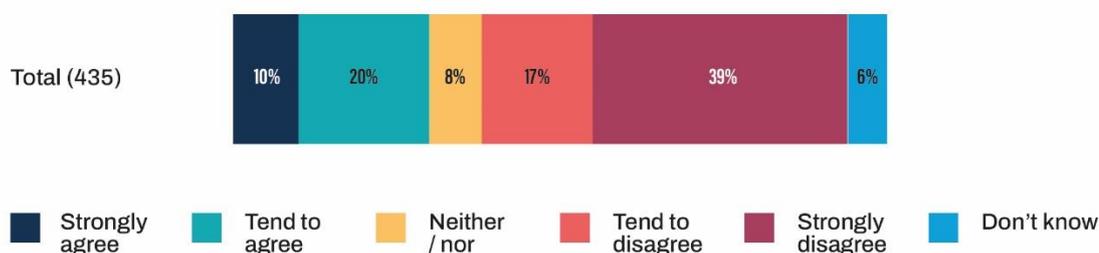
- 4.3. In reaching these decisions, we carefully considered the responses to our consultation as well as the outcomes of our continued engagement with stakeholders. We also considered the potential impact of our decisions in terms of the impact on those with protected characteristics, the impact on the Welsh language and regulatory burden. In this section we explain our decisions in relation to each new qualification.

Decision 1: We will combine language and literature and create a new integrated GCSE in Welsh for learners in Welsh-medium and bilingual schools.

- 4.4. This decision is consistent with the original proposal we put forward in the consultation. It mirrors the decision we have made to create a new integrated GCSE in English that combines language and literature.
- 4.5. A total of 435 people who responded to the consultation responded to this proposal, with the largest single group being education professionals (251). More than half (56%) of respondents disagreed with the proposal, with around

two in five (39%) strongly disagreeing. Less than a third (30%) agreed. When we consider the data by different stakeholder groups, learners were much more supportive of the proposal, with half agreeing (50%) compared with just under a quarter (24%) of education professionals. Of the 435 people who responded to the proposal, 292 people (67%) also provided a written comment.

Level of agreement with proposal 1 within the Languages, Literacy and Communication Area



4.6. In our consultation we explained our reasons for this proposal including:

- securing equity of provision for learners within and across schools, giving more learners the opportunity to study literature;
- greater flexibility for learners to have more choice about which other qualifications they want to study;
- supporting the four statements of what matters for this Area, including helping learners to make links between language and literature.

4.7. Those who agreed with our proposal did so for a variety of reasons. Many were supportive of the idea of studying the language as a whole and encouraging more learners to engage with literature, while others felt that combining language and literature qualifications would reduce duplication and improve the overall balance of qualification content. Creating more opportunities for learners to make links between both elements was also seen as a positive step.

4.8. Some respondents referred to the need for a broad and balanced curriculum and were therefore supportive of reducing the number of GCSEs in this Area to allow learners more time to study other subjects. Others welcomed a

greater degree of consistency between the Welsh and English GCSEs and agreed with the removal of tiered assessments.

- 4.9. Among those who disagreed with this proposal, a common concern was in relation to the proposed size. Some felt that replacing two separate GCSEs with a single qualification roughly the same size as one and a half GCSEs could potentially devalue the subjects and reduce their status within the Curriculum for Wales curriculum. To that end, many felt that the concept of one and a half GCSEs was confusing and that any new qualifications should be designed either as a single or a double award.
- 4.10. It is worth noting that each school decides how to organise its own curriculum and timetable. These decisions are influenced by several factors, including the Curriculum Guidance and the indicative size of qualifications. The overall size of a qualification reflects its content and assessment.
- 4.11. We still expect that integrating language and literature in a single qualification will offer opportunities to remove some of the duplication in how these subjects are currently taught and assessed. However, on reflection, we recognise that we could have been clearer when discussing the size of the qualification. We have considered the views shared by respondents and we want to be clear that no final decisions have been taken around the size of this or any other new qualification. The overall size of the qualification will be decided as we work with stakeholders to determine the qualification's design, content and assessment methods.
- 4.12. Several respondents felt that combining language and literature qualifications would negatively impact on those learners who are less able to engage with literature and currently have the option to focus more directly on language. A potentially less-focused approach on language and grammar skills, could, in their view, negatively impact these learners' literacy skills. Similar concerns were raised in relation to more able learners, and the risk that the new qualification could be diluted to ensure it is accessible to as many learners as possible.
- 4.13. While we acknowledge these concerns, we are confident that these potential risks can be addressed through the design of the new qualification, and through effective teaching practice. While qualifications certainly have a role to play on both counts, we believe that this is principally a matter of pedagogy.

- 4.14. We received a number of suggestions on how content and assessment arrangements for this new qualification could change. These included:
- the need for assessment arrangements to include a combination of non-examination assessment (NEA) and examinations;
 - the reinstating of coursework to compensate for the potential additional content coverage;
 - that revised content should be interesting and reflective of important and current literature and texts from within Wales;
 - a greater emphasis on speaking and listening;
 - that caution should be taken to avoid overloading content, and to ensure a positive experience for learners, and
 - the need to ensure that combining language and literature does not negatively impact on learners' language skills.
- 4.15. As part of the reform process, we will share these views with stakeholders who are working with us to construct new qualifications.
- 4.16. Many of the reservations expressed in response to our proposals appear to stem, at least in part, from the fact that the study of language and literature as separate qualifications is well established and deeply rooted within the system.
- 4.17. The idea that literature and language are two discrete and separate subjects is a historical artificial construct. Combining these qualifications, should not be seen as combining the study of language and literature as if they are two distinct and unconnected elements. Rather, it should be seen as an integration which helps avoid this artificial division and starts with the premise that literature is made of language, and that an appreciation of how language works enables learners to enjoy and value literature.
- 4.18. For example, oracy skills have traditionally been assessed as in language rather than literature qualifications. In an integrated GCSE however, literature could be a key focus for speaking and listening. Such an approach would be consistent with the Curriculum Guidance, which sets out clearly that,

'...learning about and through literature should be seen as contributing to all aspects of learning about languages'¹ and that literature 'in all its

¹ <https://hwb.gov.wales/curriculum-for-wales/languages-literacy-and-communication/>

forms can inspire and motivate us, while also helping us to learn more about language and communication'.²

- 4.19. As we said in our consultation, creating an integrated Welsh GCSE in this Area would secure equity of provision for learners within and across schools. We know that GCSE Welsh Literature is currently only offered as an optional subject in some schools. An integrated GCSE will support the expectation set out in the Curriculum for Wales Guidance for all learners to engage equally with all four of the statements of what matters in the Area of Languages, Literacy and Communication.
- 4.20. Continuing to separate both elements at GCSE would go against the expectations outlined above. It would also divorce literature – one of the four statements of what matters – from the remaining three.
- 4.21. An integrated GCSE offers the opportunity to design tasks that can be assessed from the perspective of language and literature. For example, texts could be studied in depth for particular aspects of literary knowledge, or several texts could be sampled for a linguistic feature – both approaches would be focused through language but with different emphases for the learners' understanding.
- 4.22. Progression to A level should not be adversely affected, as Welsh A level already combines language and literature.
- 4.23. We understand that combining language and literature will remain an unpopular decision with some stakeholders. Having reflected on all the points raised, we remain of the view that creating an integrated GCSE in this Area is the best way of delivering a broad and balanced education to learners. Integrating language and literature provides an effective and engaging model for both learners and teachers.

Decision 2: We will discontinue GCSE Welsh Second Language and create a new GCSE for learners in English-medium settings.

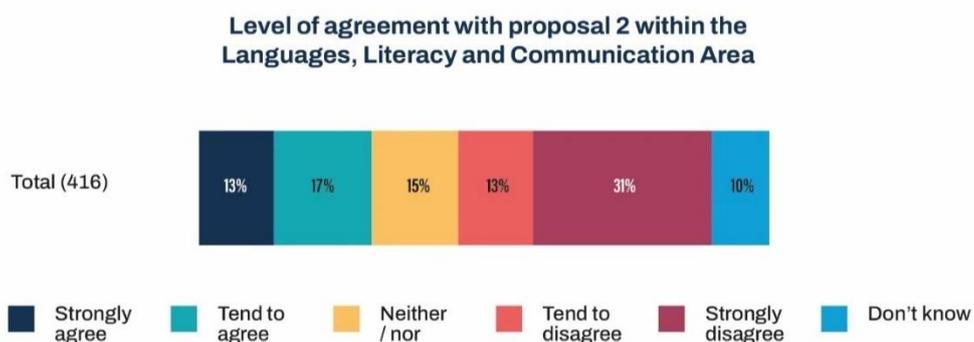
- 4.24. We will discontinue GCSE Welsh Second Language and create a new GCSE for learners in English-medium settings. The new qualification will no longer be

² <https://hwb.gov.wales/curriculum-for-wales/languages-literacy-and-communication/statements-of-what-matters/>

called Welsh Second Language, supporting the concept of a language continuum for the teaching and learning of Welsh and indicating that it will be substantially different to the current qualification.

4.25. The new qualification will be at least the same size and demand of the current GCSE in Welsh Second Language. This is a change to the qualification we proposed in the consultation, which we said should be roughly the size of one and a half GCSEs. In revising our position, we have considered the views that were shared with us by respondents, as detailed below.

4.26. In the consultation, a total of 416 people responded to the proposal, with 30% agreeing and 44% disagreeing. Overall, three in ten (31%) respondents disagreed strongly with the proposal. Among education professionals, 47% disagreed; among parents and carers, and members of the public, this rose to 59%; while among learners it fell to 31%. 226 people (54%) of those who responded to this proposal, provided a written comment.



4.27. This proposal saw a relatively high level of disagreement. This is perhaps unsurprising given the diversity of views we have heard from stakeholders over a number of years on this matter.

4.28. Those who agreed with our proposal expressed support for the continued teaching and learning of Welsh in English-medium settings. Of those, some could see that improving the qualification would support the Welsh Government's aim of reaching a million Welsh speakers by 2050. They also highlighted the need for schools to treat both English and Welsh languages equally, thereby giving the subject of Welsh greater status.

- 4.29. Some respondents also agreed with the aim of building on the strengths and successes of the current qualification. GCSE Welsh Second Language was reformed in 2017 to improve Welsh provision for learners in English-medium settings and to increase the level of challenge and demand. In agreeing with the proposal, these respondents saw it as an opportunity to explore the potential for increasing the level of challenge and demand even further now that these improvements have been embedded.
- 4.30. Discontinuing the current GCSE Welsh Second Language qualification to create a new qualification, and thereby removing the term Welsh Second Language, was also seen by some respondents as a positive step – one which would build the confidence of learners to continue learning and enjoying speaking Welsh and help them as they progress to the world of work.
- 4.31. Some respondents focused on the need for more fundamental, systemic changes such as making Welsh-medium education compulsory from the age of 3, with the need to provide additional resources for increasing and improving the workforce to support these changes. These are matters for the Welsh Government and therefore fall outside of our remit as the independent regulator of qualifications.
- 4.32. We also heard suggestions for how a new qualification designed for learners in English-medium settings could be improved in future. These included:
- ensuring the qualification is contemporary and dynamic through encouraging greater use of the language in authentic contexts;
 - providing greater opportunities for learners to study Welsh media and literary texts;
 - including more elements that widen learner understanding of the culture and heritage surrounding the language, and
 - including a greater use of technology, such as Welsh language apps and websites, to increase Welsh language proficiency.
- 4.33. We will consider these suggestions as we progress to the next stage in the reform process and work with stakeholders to decide on the qualification design and content.
- 4.34. Where respondents disagreed with our proposal, they broadly expressed concerns in the following areas:

- qualification size and the potential impact on teaching time for English and other subjects;
- subject popularity, content and relevance;
- suitability for all learners; and
- alignment with the Curriculum for Wales and the language continuum for teaching and learning Welsh.

4.35. In terms of size, respondents expressed concerns around the value of a qualification equivalent to one and a half GCSEs, and whether it would be recognised by higher education institutions and employers. They also queried how the size of this new qualification would impact on schools' timetabling. To that end, most of these respondents felt that the qualification should remain as a single GCSE for learners in English-medium settings, and that increasing its level of demand should be prioritised. Others felt that increasing its size would make this Area heavier than others, thereby reducing choice for learners in other Areas.

4.36. Others raised concerns around the potential loss of teaching and learning time for English as a result of this proposal, and consequently its impact on English literacy skills. A similar point was made in relation to international languages, with some respondents perceiving the decline in learners taking those subjects to be a consequence of learners having to study Welsh as a second language. This, in their view, was not well-aligned with the aims and purposes of the Curriculum for Wales, most notably creating informed citizens of Wales and the world.

4.37. In our consultation, we explained our reasons for increasing the size of the GCSE. Creating a larger GCSE than the current one could encourage schools to give more time to Welsh language teaching and experience. This could give learners the chance to attain a higher level of proficiency and allow the new qualification to assess more challenging content than the current qualification does. Our aim was also to help ensure parity of provision for all learners in all settings, as we indicated that the size would be similar to the new integrated Welsh GCSE for learners in Welsh-medium and bilingual settings. This could help achieve the Welsh Government's policy aim of increasing the proportion of learners who leave school as confident users of Welsh.

4.38. We have considered the views shared by respondents and we want to be clear that no final decisions have been taken around the size of this or any other new qualification. The overall size of the qualification will be decided as we work with stakeholders to determine the qualification's design, content and

assessment methods. However, we do anticipate that the qualification will be at least the size of the current GCSE Welsh Second Language.

- 4.39. This amendment to our proposal must also be understood in relation to our decision to create an additional qualification for learners in English-medium settings. By doing this, we aim to support learners who wish to progress further and more quickly in their learning, whilst at the same time limiting the risk of learners not being entered for any Welsh language qualifications due to concerns over an increase in the size of the main GCSE.
- 4.40. We also heard concerns regarding the qualification's value, relevance, and popularity with some learners, parents and carers, particularly those living in areas where the number of Welsh speakers is relatively low. Some respondents felt that greater emphasis should be placed on helping learners understand the importance of the language and how it forms part of their cultural heritage, and that studying Welsh as a subject should be optional. It was suggested that we should consider whether a formal examination was needed at all to develop Welsh language skills primarily as a means of communication. Although we have considered these views, we do not believe that these approaches would go far enough to support Welsh Government policy and their expectations of the Curriculum for Wales in relation to the language continuum.
- 4.41. Alignment with the Curriculum for Wales, and establishing a Welsh language continuum, was also raised as a key concern by members of Cymdeithas yr Iaith (The Welsh Language Society). Although they agreed with our decision to discontinue the current GCSE Welsh Second Language qualification, they disagreed strongly with our proposal to replace it with a qualification designed to be taken by learners in English-medium settings. In their view, a single Welsh GCSE qualification should be created to be taken by all learners, an approach, they believe, that would better reflect the principle of a continuum of Welsh language learning and provide a consistent way of measuring progress and attainment.
- 4.42. We want to ensure that all learners are supported to make the best progress they can along the Welsh language continuum. This needs to reflect the context in which they are developing their Welsh language skills and the exposure they have had to the Welsh language. The current differences in levels of proficiency between learners in different educational settings mean that it would not be fair or practical at this time for all learners to be assessed

through a single qualification. As the qualification and the Curriculum for Wales become more established, we will consider whether the demand of the qualification should be increased to reflect and support improving levels of Welsh language proficiency. This includes periodically reassessing the case for multiple Welsh language qualifications.

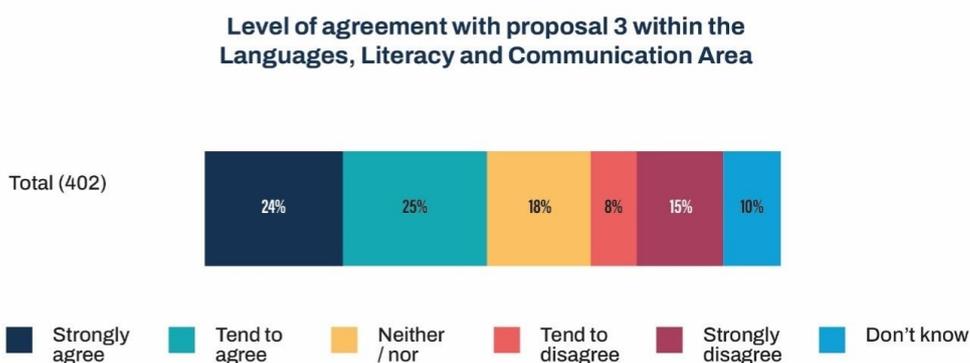
- 4.43. Some stakeholders have also told us that they would like to see more similarities between the Welsh language qualifications taken by learners in different educational settings. As we work with stakeholders in the next stage of the reform process, we will explore how the new qualification can relate more clearly to the GCSE designed for Welsh-medium and bilingual settings, and to the Curriculum for Wales. For example, the current GCSE Welsh Second Language combines elements of language and literature to allow learners to explore language for different purposes, including descriptive, creative and imaginative writing. This is something we may want to carry forward with the new qualification.
- 4.44. Since the consultation, we have continued to meet with Welsh Government officials to discuss their long-term goals of establishing an internationally recognised Welsh language-reference framework such as the CEFR³. This framework would support the concept of the Welsh language continuum and would help learners see how their achievements relate to other language qualifications, including post-16 Welsh language qualifications.
- 4.45. We support the Welsh Government in these aims and recognise the importance of working with officials and other stakeholders as this work develops. We will actively consider how each of the new Welsh language qualifications we develop could align to the Welsh language-reference framework, including the new GCSE for learners in English-medium settings.

Decision 3: We will create a new additional qualification for learners in English-medium settings who are ready to progress further and more quickly in their Welsh language skills.

- 4.46. We will create a new qualification to provide additional stretch and challenge for learners in English-medium settings who are ready to progress further and more quickly in their Welsh language skills.

³ <https://www.common european framework.org>

- 4.47. This decision replaces the original proposal we put forward in our consultation. In the consultation we proposed creating a set of small Welsh language skills qualifications that can be taken in addition to a GCSE to support progression along the language continuum for the teaching and learning of Welsh. Although there was interest in this proposal, respondents also raised some concerns which we have taken into consideration when revising our position. These are outlined below.
- 4.48. In the consultation, a total of 402 people responded to this proposal. Almost half (49%) agreed, while just under a quarter disagreed. When looking at sub-groups, a relatively small proportion of learners (7%) strongly disagreed compared with a much higher 22% of parents and carers, and members of the public. Educational professionals fell between the two, with 14% strongly disagreeing. 48% (194 people) of those who responded to this proposal provided a written comment.



- 4.49. In contrast with the other two proposals relating to Welsh language qualifications, we saw a relatively high level of agreement with our proposal to create a set of small Welsh language skills qualifications that can be taken in addition to a GCSE to support progression along the Welsh language continuum. It is clear that the concept of offering additional opportunities for learners to develop their skills and confidence appealed to a number of respondents.
- 4.50. Those who agreed felt that these smaller qualifications could play an important role in providing greater opportunities for learners to practise their spoken Welsh and improve Welsh language skills for employment. In their

view, this would improve learner confidence and encourage more learners to continue developing their Welsh language skills after turning 16 years of age. Providing an element of choice was also seen as a positive by some respondents, particularly for stretching and challenging those learners with a particular aptitude or interest in language learning.

- 4.51. Creating a set of small Welsh language qualifications, and making effective use of digital technology, was also seen to demonstrate innovation and an openness to change the current system. However, those respondents did express some caution, noting the need to enable parity of provision across all schools in Wales to avoid some learners being disadvantaged.
- 4.52. Despite these areas of agreement, it was clear that caution was needed when interpreting this data. Many respondents sought further clarification to the purpose of these small qualifications and how they related to the main GCSEs being proposed.
- 4.53. We also saw some respondents expressing support for these small qualifications as an alternative to the one and a half GCSE Welsh qualification proposed to be taken by learners in English-medium settings. This was not our intention with this proposal; these small Welsh language qualifications were always intended to be designed to be taken by learners alongside the proposed new Welsh GCSE, and to support progression along the Welsh language continuum.
- 4.54. Those who disagreed did so for very different and contrasting reasons. Some respondents fundamentally disagreed with the principle of creating additional Welsh language qualifications as it was perceived to elevate Welsh over English and that this would result in less teaching time within the curriculum for other subjects. We also heard calls for similar provision to be developed for English as a subject.
- 4.55. In contrast, other respondents disagreed with this proposal as it may lead to a drop in the amount of time learners in English-medium settings spend learning Welsh and more learners being entered for lower-level qualifications, which could cap their development and attainment. Some of these respondents noted a clear preference for a single, holistic qualification to be taken by all learners.

- 4.56. Respondents also posed questions around the purpose of these smaller qualifications, how they would relate to, and interact with the proposed GCSEs and whether the GCSEs themselves could strengthen specific Welsh language skills, and help learners develop their confidence as users of Welsh. Conversely, others felt that a more basic qualification should be designed for learners for whom GCSEs are not deemed appropriate.
- 4.57. Having considered these views, and having conducted further work, we have revised our decision in relation to this set of small Welsh language qualifications.
- 4.58. We will now create a singular additional qualification for learners in English-medium settings that will complement and build on the learning that takes place as part of the main GCSE. Although we will not fix the size of the qualification at this stage, we anticipate that it will be smaller than a GCSE. The grading structure would likely be different to that used for GCSEs.
- 4.59. The main purpose of the qualification will be to stretch those learners who are ready to progress further and more quickly in their Welsh language skills. In supporting learners who are making good progress, we see that many schools could opt to use this qualification in a similar way to which the Additional Mathematics Level 2 qualification is currently used.
- 4.60. We also know that some stakeholders would like to see additional provision for learners who have previously received their education through the medium of Welsh but who have transferred to an English-medium setting. These learners could benefit from the additional stretch and challenge of this qualification and the opportunity for their levels of Welsh language skills and proficiency to be recognised.
- 4.61. The qualification will be designed to build on the teaching and learning that takes place in the main Welsh GCSE, with a continuation of the emphasis on speaking and listening to help learners become confident users of Welsh. To build on this skills development, the key focus will be on providing additional meaningful learning experiences, and the qualification will be structured to promote the use of Welsh in authentic learning contexts.
- 4.62. In structuring the qualification in this way, the intention is to provide practical support so learners can see the real-world relevance of progressing in their

Welsh language skills. Given the different experiences of learners throughout Wales, it would also help to ensure greater parity in the opportunities to encounter Welsh outside of the classroom.

- 4.63. This additional qualification will support the Welsh language continuum. It recognises that learners progress in their language skills at different paces and supports those providing Welsh language provision to help learners develop in their Welsh language proficiency according to their levels of ability. The focus on providing learners with authentic learning experiences could help to provide shared experiences between those in English-medium settings and those who have acquired Welsh through language immersion. Offering rich opportunities for learners who can, and want to, develop their skills to speak and use Welsh is essential if we are to raise the number of confident Welsh speakers in Wales.
- 4.64. The qualification could also promote progression pathways to A level study. It could help to raise learner confidence and help learners to see the applicability and relevance of the language skills they acquire as part of the GCSE. As we progress to the next stage in the reform process, we will work with stakeholders to consider the potential opportunities for supporting progression. For example, the qualification could be designed to align with the Welsh Second Language A level by including aspects such as a focus on grammar and speaking and using Welsh in contemporary society.
- 4.65. When discussing this recommendation with stakeholders, a few of them suggested some potential alternative ways for providing additional stretch and challenge. These alternatives include learners taking the Welsh GCSE for English-medium settings early and then going on to take either the GCSE designed for Welsh-medium and bilingual settings, or the AS Welsh Second Language qualification. We have considered these options but believe they are problematic. Not all English-medium schools have the necessary teaching capacity and capability to deliver either of these more challenging qualifications. Even in those English-medium schools that could offer one of these qualifications, it is unlikely that learners would have enough time to complete these additional qualifications. The GCSE is designed to be studied over two years; and although the AS is overall a bigger qualification than a GCSE it is designed to be completed in one year. We also have concerns about the potentially detrimental effect of 14-16-year-olds sitting a qualification specifically designed for post-16 learners. Furthermore, it is not clear how this option could support learners to continue with their study of Welsh. It could

result in limiting the options currently available for continuing with Welsh after the age of 16.

- 4.66. We know that for some stakeholders, an additional qualification targeting a relatively small number of learners could be perceived as not going far enough. Some stakeholders we spoke to feel that the main focus should be on improving the teaching and learning of Welsh within the classroom and that the most effective way to do this is through a larger and more demanding GCSE for learners in English-medium settings. We have considered this view, however on balance, and having analysed the feedback we received throughout the consultation process, we do not think that this option is achievable at this time. As we have already mentioned, as the Curriculum for Wales and the new Welsh language qualifications embed, we will continue to review the situation to see if multiple qualifications with different purposes are still needed to support the needs of learners and meet curriculum expectations.

5. Next steps

- 5.1. As we move forward to the next stage in the reform process, we will continue to liaise with Welsh Government officials to ensure that our decisions align with policy direction for the Welsh language.
- 5.2. We will take the same approach to shaping the content and assessment of the new Welsh language qualifications as has been established for other future GCSEs and related made-for-Wales qualifications. This includes involving colleagues from across the education sector at all levels: as part of the subject level working groups looking at individual qualifications; in stakeholder groups focusing on the Languages, Literacy and Communication Area; and as part of a broader stakeholder reference group to consider emerging proposals in the round and to secure coherence within this and the other Areas.
- 5.3. WJEC has committed to working with us to develop the future range of made-for-Wales GCSE and other related qualifications, including the new Welsh language qualifications.
- 5.4. Once our initial stakeholder engagement on the high-level content and assessment of the Welsh language qualifications is completed in summer 2022, we will be seeking feedback in the autumn term.

- 5.5. We aim to develop and approve the new Welsh language qualifications by September 2024. This will give schools sufficient time to prepare and familiarise themselves with them in readiness for first teaching in September 2025.

6. Integrated Impact Assessment (IIA)

Introduction

- 6.1. An Integrated Impact Assessment (IIA) is an assessment of the likely impacts of a regulatory activity. We must carry out our regulatory activities in a way that is transparent, accountable, proportionate, targeted and consistent, and have regard for government policy as directed by Welsh Ministers.
- 6.2. Through our IIA, we demonstrate that we are regulating in accordance with our principal aims, and the eight matters we must have regard to, as outlined in the Qualifications Wales Act (2015),⁴ as well as in line with the principles of better regulation⁵ and HM Treasury guidance.
- 6.3. This section sets out our IIA of the decisions we outline in this document. It includes a summary of our Regulatory Impact Assessment (RIA), Equalities Impact Assessment and Welsh Language Impact Assessment.
- 6.4. This section only refers to the decisions we are making in relation to future Welsh language qualifications. We included a full IIA in relation to our decisions on the overall suite of future GCSEs and related made-for-Wales qualifications when we published our full [Decisions Report](#) in October 2021.
- 6.5. To reach our decisions on future Welsh language qualifications, we conducted a thorough impact assessment of all the options that were available to us. This section only discusses the impacts of the options we are taking forward.
- 6.6. We have considered many sources of evidence as part of our approach to assessing impact. These include:
- a) a full range of reviews and regulatory documents that relate to Welsh language qualifications;
 - b) feedback from a wide range of stakeholder engagement including:

⁴ <https://www.legislation.gov.uk/anaw/2015/5/contents/enacted>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/735587/better-regulation-framework-guidance-2018.pdf

- Coleg Cenedlaethol Cymraeg
 - CYDAG
 - Cymdeithas yr Iaith
 - Estyn
 - Higher education representatives including ITT departments
 - Learners
 - Regional Education Consortia
 - School leadership teams
 - The Seren Network
 - Welsh Government
 - Welsh Language Commissioner's Office
 - Welsh language practitioners from English-medium settings
 - WJEC
- c) commissioned research from assessment experts;
- d) a desk-based review of a range of specifications and other documents for a wide range of language qualifications at various levels, including A level specifications;
- e) certification data collected by Qualifications Wales to identify the size of the market and consequent potential impact of our regulatory action.

6.7. The decisions we discuss in this section relate to the set of three Welsh language qualifications we will create to align with the Curriculum for Wales, namely:

- We will combine language and literature and create a new integrated GCSE in Welsh for learners in Welsh-medium and bilingual schools.
- We will discontinue GCSE Welsh Second Language and create a new GCSE for learners in English-medium settings.
- We will create a new additional qualification for learners in English-medium settings who are ready to progress further and more quickly in their Welsh language skills.

Regulatory Impact Assessment

6.8. To reach our decisions, we carried out an assessment of the likely impacts of a range of options, including the option of remaining with the current Welsh language qualifications. Our assessment included considering the main

impacts we identified, both negative and positive, for a range of stakeholders, including learners, practitioners, awarding bodies, Welsh Government and wider stakeholders.

- 6.9. Overall, our assessment shows that we believe the benefits of our preferred approach outweigh the disbenefits or risks. Where we have identified potential disadvantages, we have also identified ways to reduce these possible risks. As such, we believe that what we are proposing is the right course of action and that it is proportionate.

Impact on learners

- 6.10. The needs and interests of learners are at the forefront of all our regulatory action, and these are the main reasons for reaching the decisions we have included in this document.
- 6.11. Our decisions reflect our intentions to align Welsh language qualifications with the Curriculum for Wales' ambitions for learners.
- 6.12. By combining language and literature to create a new integrated GCSE in Welsh, our aim is to support more learners to recognise the links and synergies between language and literature. Our decision means that more learners in Welsh-medium and bilingual schools will be exposed to literature after the age of 14, as currently GCSE Welsh Literature is offered only as an option in some schools. There is an expectation in the Curriculum for Wales that all learners access all statements of what matters until the age of 16, and this includes allowing learners to experience how 'literature fires imagination and inspires creativity'⁶.
- 6.13. This decision mirrors the approach that we are taking in creating a new integrated GCSE in English, ensuring that learners have the same opportunities to explore language through literature in both languages.
- 6.14. Integrating Welsh language and literature into one qualification also increases the opportunities for learners to make choices about other qualifications they wish to study within a broad and balanced curriculum.

⁶ [https:// hwb.gov.wales/curriculum-for-wales/languages-literacy-and-communication/statements-of-what-matters](https://hwb.gov.wales/curriculum-for-wales/languages-literacy-and-communication/statements-of-what-matters)

- 6.15. In making this decision we also considered levels of learner engagement and manageability of the qualification. Integrating the subjects provides opportunities to innovate or update content and assessment methods. For example, more explicit links could be made between the unseen texts in language exams and the literature texts that learners study. This would help to contextualise some of the unseen texts for learners and link them more strongly with other aspects of the qualification. Another example could be to provide opportunities to write creatively in response to a literary text. Steps such as these could lead to a more holistic approach to assessment and a decrease in assessment burden.
- 6.16. Reforming qualifications inevitably brings an element of risk, and we are aware that some learners may be concerned about how change could impact perceptions of the qualification. Learners may have particular concerns about how the new qualification will continue to support progression to further study, including to university. We have spoken to Higher Education Institutions (HEIs) and are confident that this decision will not negatively impact progression. Integrating language and literature within qualifications reflects the approach taken internationally and at Higher Education level and mirrors the structure of the Welsh A level qualification. We have conducted research in this area and will continue to engage with HEIs as we work with stakeholders to decide on the qualification's design and content.
- 6.17. Our main aim in creating a new Welsh language qualification for learners in English-medium settings is to support all learners in making the best progress they can along the Welsh language continuum. We want all learners in Wales to become confident speakers and users of Welsh and we are committed to helping learners develop their Welsh language proficiency at a pace which is right for them.
- 6.18. We know that qualifications need to be ambitious if they are to support the Welsh Government's policy for increasing the number of learners who leave school as confident users of Welsh. But we also need to recognise that the changes need to take place incrementally and over time to support learners as they adapt to those changes.
- 6.19. We firmly believe that the reforms that have already been introduced with the current GCSE Welsh Second Language have had a positive impact for learners.

The aim of our decision is to build on these improvements and to increase the challenge and expectations for learners in the fairest and most achievable way. Introducing a qualification that is too demanding too quickly could impact learner engagement and create an unfair sense of underachievement or failure.

- 6.20. By removing the concept and terminology of 'Welsh second language', we aim to encourage all learners to see themselves as Welsh speakers making progress in their Welsh language proficiency and continuing along the Welsh language continuum.
- 6.21. The additional qualification we are creating supports those learners who are making good progress in their study of the Welsh language in English-medium settings. The additional stretch and challenge will support these learners to progress more quickly along the Welsh language continuum while ensuring that the GCSE remains inclusive and accessible. This helps to ensure a fair and equal opportunity for all learners to achieve in Welsh.
- 6.22. The additional qualification will be designed to complement the learning that takes place within the GCSE. By focusing on authentic and engaging learning experiences, the aim is for more learners to see the value and relevance of Welsh outside of the classroom. This allows shared experiences between those in English-medium settings and those who have acquired Welsh through language immersion.
- 6.23. As it is ultimately schools that choose which qualifications to offer to learners, there is a risk that not all learners will benefit from the opportunity to study the additional qualification, particularly when it is first introduced. As we progress to the next stage in the reform process, we will work with stakeholders to raise awareness of the qualification and its value and relevance for both learners and teachers.

Impact on teachers and schools

- 6.24. We know that integrating language and literature is a significant change for some teachers. However, having assessed the impacts of this decision, the benefits, as outlined in this report, outweigh the disbenefits. For example, this decision allows schools to offer a broader choice of qualifications to learners, reflecting the ethos of a broad and balanced curriculum.

- 6.25. In creating qualifications to align with the Curriculum for Wales' expectations for the Welsh language, our aim is to help affirm the status of Welsh as a subject in English-medium settings.
- 6.26. Building on the strengths and successes of recent reforms, we aim to continue to explore ways to make Welsh language qualifications relevant, enjoyable and engaging, thereby improving the experience of both learners and teachers.
- 6.27. We appreciate that some teachers may have concerns about how the additional qualification for learners in English-medium settings could be implemented in practice. As we progress to the next stage in the reform process, we will work with stakeholders to consider manageability. For example, we will work with teachers and WJEC to explore ways to focus on learner autonomy and independent study. We will also consider the role of digital resources and input from external bodies. In aligning the qualification to the main GCSE, our intention is to support teachers as they differentiate within the classroom.
- 6.28. We know that this is a complex and sensitive area of qualification reform. To support the successful implementation of the new Welsh language qualifications, strategies will be needed to effectively communicate the changes. As we move forward, we will work with a range of stakeholders to raise awareness about the purpose and value of the qualifications in order to instil certainty and confidence. This includes helping schools to see how the qualifications can contribute to meeting the Welsh Government's statutory requirements in relation to the Welsh language.

Welsh Government

- 6.29. In assessing the impact of our decisions, we have considered how the new Welsh language qualifications can contribute to a national approach aimed at increasing the number of Welsh speakers. As we move forward, we will continue to liaise with Welsh Government officials to ensure that our decisions reflect curriculum expectations and wider strategic aims.
- 6.30. The Welsh Government is working towards its long-term goals of establishing an internationally recognised Welsh language-reference framework such as the CEFR to support the Welsh language continuum. In deciding how the new qualifications will be designed and assessed, we will actively consider how

they can align to the proposed Welsh language-reference framework. Our aim will be to encourage learners to see how their achievement relates to other language qualifications, including post-16 Welsh language qualifications to help with the transition to the world of work.

- 6.31. We believe the qualifications we will make available will reinforce the ambitions of the Curriculum for Wales in relation to the Welsh language. We will work with the Welsh Government to ensure that the changes are communicated effectively and that schools are prepared for implementing the changes.

Impact on WJEC

- 6.32. We know that making changes to the Welsh language qualification offer may incur additional costs for the awarding body. We will work with WJEC to assess the impacts, including any potential increase in overall costs, as well as any benefits.
- 6.33. In our main Decisions Report we outlined the assessment we have done to date in relation to the impact of our proposed range of made-for-Wales GCSEs and other related qualifications. We believe that these should be viable and sustainable in the long term for WJEC to offer. This is because the fee income from high take-up in GCSE qualifications such as maths, science, English and Welsh should compensate for those qualifications which may attract a lower take-up. This has been confirmed by our initial cost benefit analysis which suggests that across all our proposals, the monetised costs are broadly cost neutral.
- 6.34. We recognise that introducing the new additional qualification brings a level of uncertainty for WJEC as uptake may be low in the initial stages. It will be for schools to decide whether to offer the new additional qualification or not. We will work with WJEC to carefully communicate the qualification's value and currency to learners and their teachers.

Equalities Impact Assessment

- 6.35. We have conducted an Equalities Impact Assessment to identify whether our decisions are likely to have any impact (positive or negative) or differing

effects on different groups who share one or more of the protected characteristics identified by the Equality Act (2010).⁷

- 6.36. Fairness is a core consideration in our work, and although we know that qualifications in themselves cannot address the inequalities or unfairness that exist in the education system or in society more widely, we are committed to doing all that we can to prevent them from adding disadvantage or exacerbating existing disadvantages.
- 6.37. In considering the set of Welsh language qualifications that should be available to learners in the future, we have been clear that we want all learners to have the best opportunities possible to progress along the Welsh language continuum at the pace which is right for them. We want all learners to feel confident as speakers and users of Welsh, from those with basic Welsh language skills to those with Welsh language proficiency. We believe that the set of qualifications we offer secures equal access and the appropriate level of demand and knowledge for all learning needs and interests.
- 6.38. In deciding to create a new integrated GCSE in Welsh for learners in Welsh-medium and bilingual schools, we have considered the impact on learners from a range of ability levels to ensure that the decision does not unfairly affect any group of learners. Our intention is to ensure that all learners access all the statements of what matters until the age of 16, as set out in the Curriculum Guidance.
- 6.39. We know that learners across Wales have different experiences of learning Welsh, and this has informed our decision-making in relation to the qualifications that should be made available to learners in English-medium settings. We have considered the need to ensure that learners from different geographical backgrounds have the same opportunities to benefit from Welsh language qualifications. We have listened to concerns shared with us by stakeholders who live in regions where the number of Welsh speakers is relatively low, and we have explored ways to ensure that all learners can be supported to experience and use Welsh in authentic, real-life scenarios.

⁷ <https://gov.wales/written-statement-equality-act-2010-statutory-duties-wales-regulations-2011-equality-act-2010>

- 6.40. As we progress to the next stage in the reform process, we will work with stakeholders to ensure that the design, content and assessment arrangements limit the barriers which learners may face due to geographical differences.
- 6.41. We believe that our decisions will have a positive impact on learners on the basis of their age, providing opportunities for them to progress further in their Welsh language skills by taking qualifications that are designed to be age appropriate.
- 6.42. While we have not found evidence to suggest that our decisions will impact on learners from certain socio-economic backgrounds, we will carry out further impact assessments as we work with stakeholders on the design of all the new Welsh language qualifications and consider the impact of any decisions relating to their design on these groups and as part of our future monitoring of the qualifications.
- 6.43. We are not currently subject to the Well-being of Future Generations (Wales) Act 2015 (FG Act)⁸, but we consider how our role supports its purpose, and how its requirements are compatible with how we work. As such, we have voluntarily chosen to adopt its provisions to underpin how we deliver our functions, and have therefore set our own well-being objectives, incorporating these onto our Regulatory Framework and Approach.
- 6.44. We have therefore considered the impacts of our decisions on the well-being of future generations, in line with the Act's five ways of working and its seven well-being goals. Our decisions for Welsh language qualifications reflect our commitment to a Wales of vibrant culture and thriving Welsh language, and to helping learners feel confident in contributing to this goal. In adopting our regulatory approach, we have sought to work collaboratively with the Welsh Government and others to clarify our long-term aims and ambitions. These priorities will help shape our work as we progress to the next stage in the reform process.
- 6.45. In preparation for engaging with stakeholders during the next phase of our work, we will adopt a consistent approach to the other GCSE and related made-for-Wales qualifications we are reforming. We have produced a series of papers exploring our design and assessment priorities. This series includes

⁸ <https://www.futuregenerations.wales/about-us/future-generations-act/>

a paper covering matters relating to equalities, accessibility, inclusivity, diversity and future generations and how they should be incorporated into the development of future qualifications. With that in mind, we are committed to having an open, collaborative and co-construction approach when developing Welsh language qualifications. This includes engaging with representative groups.

- 6.46. We believe that our proposals for the design of the qualification will have a positive impact on all learners. At this stage, we have not identified any negative impacts on persons who share protected characteristics.

Welsh Language Impact Assessment

- 6.47. Throughout this document, we have provided a rationale for our decisions in relation to future Welsh language qualifications which includes the outcomes of our assessment of the impacts on the Welsh language.
- 6.48. We have been clear on our commitment to support the Welsh Government's policy of establishing a Welsh language continuum, as well as wider strategic aims in relation to the Welsh language.
- 6.49. In reaching our decisions, we fully considered all the options available to us in line with the Welsh Government's current policy intentions. We will continue to assess the potential impacts of our decisions on the opportunities for persons to use the Welsh language and treat the Welsh language no less favourably than the English language as we progress to the next stage of our work.

