



# WLGA & ADEW's Consultation Response

Our national mission: a  
transformational curriculum

25 March 2019



CLILC • WLGA



## INTRODUCTION

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales. The three national park authorities and the three fire and rescue authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The WLGA is pleased to be able to respond to Welsh Government's consultation article on *Our national mission: a transformational curriculum*. This response has been informed by the knowledge and expertise of the Association of the Directors of Education in Wales (ADEW). As such this is a joint consultation response on behalf of the WLGA and ADEW and represents the collective views of the 22 local authorities in Wales.
4. The following response is structured around the specific questions set out in the proposal for a new legislative framework.

**Question 1** – Do you agree with our approach to legislating for the new curriculum structure?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons and/or suggestions for improvement:

The approach to legislating for curriculum is the right one as it is now forward-looking and pupil-centred. The elements which are being legislated for are the right ones. It is essential that the broad and balanced approach to the curriculum is emphasised.

**Question 2** – Do you agree we should impose a duty on schools and funded nursery settings to provide a curriculum to help most learners to reach, or go beyond the Achievement Outcomes set by the school and to progress children along the continuum for the Progression Steps in accordance with their educational development?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons and/or suggestions for improvement:

All settings have a duty to enable pupils to achieve the very best they are capable of. There needs to be a strong emphasis on the progress of pupils in line with their personal education development. Every member of staff in setting should be aware of the duty and the need to enable pupil progress regardless of need. Good quality national guidance will be essential.

**Question 3** – What actions should the headteacher and governing body take to satisfy this duty?

Headteachers and governing bodies should ensure that:

- the skills and abilities of all pupils should be known
- all staff should have the highest expectations of pupils and provide activities that match pupil need with high levels of challenge.

**Question 4** – What support would be required to enable schools to take those actions?

Schools need very clear and unambiguous legislation and guidance in order to take the actions required. Schools need time, space and opportunities for professional learning which ensures that all staff understand and are clear about the actions required.

**Question 5** – Do you agree that age-appropriate careers education and work-related education should cover the age range 3–16, in line with the AoLEs?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

Careers advice and support is of paramount importance. In in line with the AOLES children and young people should be provided with information, advice and guidance that

enables them to understand the full range of career pathways and opportunities related to their particular interests at a point in time. Opportunities for older pupils to research and develop their own understanding of career pathways should be provided, along with opportunities for them to discuss their findings with others.

**Question 6** – Do you agree with making age and developmentally appropriate RSE compulsory for 3–16 years?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

It is essential that all children and young people have the opportunities to engage in age and developmentally appropriate Relationships and Sex Education for 3 -16 years olds. It is essential that it is set in a holistic context of healthy relationships and that parents are provided with the opportunity to understand that it relates to a much wider range of subject matter than previous iterations of this element of the curriculum.

**Question 7** – Do you agree with the proposed changes to the guidance-making power so that it is designed to secure that RSE is provided in a way that is age and developmentally appropriate to the children receiving it?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
	<input checked="" type="checkbox"/>				

Please give your reasons:

It will be helpful that the Welsh Ministers provide statutory guidance on 'developmentally appropriate' RSE. This will be needed to replace and improve existing provision for guidance on 'age appropriate' provision of sex education. This acknowledges, that, whilst age will still be a factor in making decisions around provision, schools will need to consider the physical and cognitive development of their learners, including taking into account the experience of learners, when making decisions regarding planning RSE content. Further consultation with stakeholders is needed in the preparation of the guidance.

**Question 8** – Do you agree with our proposals to make RSE optional for learners in sixth forms?

Yes. The elements of the RSE curriculum can be fully covered in the 3 – 16 curriculum. The optional nature of this should reflect fully the priorities of young people and their schools in securing their futures. However, the legislation needs to ensure that schools have an active and good quality offer post 16 even though it may not be compulsory.

**Question 9** – Do you agree with the proposed approach to RE?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

It is essential that the proposed approach encompasses all pupils and that all aspects of it are covered in the context of the humanities curriculum. The approach to RE should be seen in the context of the opportunities it provides pupils to develop skills such as research, debate, discussion, understanding and accepting difference.

**Question 10** – Do you agree with our proposals to make RE optional for learners in sixth forms?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

Yes. The elements of the RE curriculum can be fully covered in the 3 – 16 curriculum. The optional nature of this should reflect fully the priorities of young people and their schools in securing their futures.

**Question 11** – Should the right to withdraw from RE and RSE be retained?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

The right to withdraw completely should not be retained as they are compulsory parts of the curriculum which will be legislated for. There should be an opportunity for withdrawal

where aspects of the curriculum are not congruous with the beliefs of individuals. There is a risk if the latter element is not included, that, there may be a rise in EHE as parents/carers may see this as critical to their children/young people remaining in school based education.

**Question 12** – If the right to withdraw is to be retained, should it remain with the parent (parent includes those with parental responsibility or those who have care of the child)?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input checked="" type="checkbox"/>
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If yes, please give your reasons. If no, please give you reasons and suggest alternative arrangements:

The right to withdraw should rest with the parents of young children. Where pupils are able to understand, have valid reasons and are able to articulate them effectively, the right to withdraw should pass to the pupil as long as the parent is made aware. However, the basis for assessing whether the child/young person has the capacity to understand may prove difficult to define.

**Question 13** – If the right to withdraw is removed, what alternative, if any, should be in its place?

What alternative arrangements, if any, would you put in place?

Alternative arrangements should be agreed locally by schools and governing bodies.

**Question 14** – What are your views on the proposed approach for ensuring that the learning and teaching of Welsh is an integral component of the curriculum for Wales?

It is essential that the learning and teaching of Welsh is a key component of the new curriculum if we are to ensure that we reach the target of 1 million Welsh speakers by 2050. It will be essential for Welsh and English to be on an equal footing and for the terminology of 1<sup>st</sup> and 2<sup>nd</sup> language to be removed and for these to be replaced by levels of competence in both languages. Although a statement was issued regarding the misunderstanding regarding immersion in the early years, this is not in the white paper

we are responding to. Therefore a statement of clarification is essential e.g. immersion in the Welsh Language during the foundation phase is proving to be a highly effective model and legislation should reflect that methodology. A statement regarding the formal learning and teaching of English from Year 3 onwards in Welsh medium schools should be included for clarity.

**Question 15** – What are your views on the legislative proposals to enable the new assessment arrangements?

We agree fully with the decision to remove the high stakes for learners in relation to creating checks for the system. It is therefore necessary to remove the current legislation in relation to assessment to enable this to happen

**Question 16** – Do you agree with the proposed approach outlined for evaluating the effectiveness of curriculum and assessment arrangements?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input checked="" type="checkbox"/>
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Please give your reasons:

Whilst we are generally supportive of progression steps, there isn't yet a sufficiently clear understanding of what the impact of this or the unintended consequences of this might be.

There is still significant work that needs to be done particularly in relation to headteachers having due regard for achievement outcomes at the progression steps and the introduction of E-Portfolios and what this will mean for schools and learners.

**Question 17** – What are your views on the proposed approach to the publication of learner assessment data and any risks you foresee?

It is important the publication of learner assessment data is not linked to accountability at school or local authority level. However there are inherent risks here in how elected members will be engaged in understanding accountability and the continued desire to use previous accountability measures to account. It will be important that national sampling of key priorities is reported and there are sufficient mechanisms in place to make sure it is understood.

**Question 18** – Do you agree with our approach for the RIA?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons and whether there is anything else you think we should take account of:

The regulatory impact assessment is detailed at this stage however, the costings should be provided at the earliest opportunity.

**Question 19** – Do you agree with our approach for the impact assessments? We would particularly value your view on the proposed impacts on groups with protected characteristics.

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Don't know</b>	<input type="checkbox"/>
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Please give your reasons:

The approach provided is comprehensive.

**Question 20** – We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Supporting comments

Fully agree that the proposals would have a positive impact on the Welsh language. However simply providing opportunity that the language will be fully lived by all will require a significant level of change in the approach to professional practice and culture of all teachers particularly in relation to initial teacher education and we would question whether this has been built in sufficient to the initial teacher education model.

**Question 21** – Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

N/A

**Question 22** – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

N/A

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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**For further information please contact:**

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