



# The new Curriculum for Wales

Report of the Auditor General for Wales

May 2022



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Mae'r ddogfen hon hefyd ar gael yn Gymraeg.

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# Key messages

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## Context

- 1 The Welsh Government has been undertaking a programme of major education reform over the past decade or so. The reform programme features prominently in the current Programme for Government. One of the Welsh Government's wellbeing objectives is to 'Continue our long-term programme of education reform, and ensure educational inequalities narrow and standards rise'<sup>1</sup>.
- 2 These changes have led to a new Curriculum for Wales (the curriculum) that will be implemented in phases from September 2022. The curriculum will be a significant departure from the previous one by allowing each school flexibility to develop its own curriculum according to local needs, although within certain parameters. The new curriculum is for 3-16 year olds. It replaces the Foundation Phase (3-7 year olds) and the Curriculum for Wales for key stages 2-4 introduced in 2008. Unlike the previous curriculum, it extends to special schools and pupil referral units. In this report, we generally include these other settings within our use of the term 'schools'.
- 3 This report looks at the Welsh Government's management of the planning and implementation of the new curriculum. The new curriculum has been in development since 2015 and action plans and the timetable have changed since then. Our aim was to provide assurance that implementation is on track in the context of the revised plans announced in July 2021. Following earlier changes to the timetable in 2017, the Welsh Government announced in July 2021 that implementation of the curriculum will still start in all years of primary schools from September 2022. However, it will now be optional for year 7 in secondary schools, special schools and pupil referral units before becoming mandatory for years 7 and 8 and other settings from September 2023.
- 4 **Appendix 1** sets out our audit approach and methods. **Appendix 2** shows a timeline of key events relating to curriculum reform.

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1 Welsh Government, Programme for Government – Update, December 2021

## Overall conclusion

- 5 The Welsh Government worked well with the education profession to co-design the new curriculum. While the Welsh Government had a challenging programme of legislation and other work leading up to September 2022, much of this is completed. However, the pandemic has affected the timetable and schools' ability to prepare.
- 6 The Welsh Government did not assess the likely costs when it started the journey of curriculum reform. Estimates provided to support more recent legislative scrutiny were limited, preventing a full assessment of value for money. We recognise it is difficult to accurately quantify the cost of curriculum reform. However, current budgets suggest that direct expenditure may be at the high end of, or more than, the Welsh Government's 2021 estimates. There will be significant opportunity costs to schools until at least March 2026.
- 7 The Welsh Government is alert to some key risks and will need to continue to manage these to ensure the new curriculum realises its anticipated benefits.

## Key findings

- 8 The Welsh Government did not assess the direct or opportunity costs when it began to develop the new curriculum. It later estimated its sunk costs, and those of schools and others involved in developing the curriculum, in the regulatory impact assessment published alongside the Curriculum and Assessment (Wales) Bill in July 2020 and later updated. Its best estimate was that developing the new curriculum cost £159 million between 2015-16 and 2020-21, although it recognised this total does not include some costs.
- 9 The Welsh Government anticipated future direct costs of £198.5 million (ranging from £184 million to £213 million) between 2021-22 and 2030-31. Schools also face substantial opportunity costs, estimated at around nine times their direct costs. Recent Welsh Government budget papers suggest that spending related to curriculum reform is likely to be at the high end of, or more than, the Welsh Government's April 2021 estimates.
- 10 The Welsh Government and regional education consortia worked well with schools to co-design the new curriculum and identify the skills and knowledge required to realise it. The Welsh Government has also funded a programme of professional learning and support to schools to help them develop and implement the new curriculum although its effectiveness is unclear.

- 11 The COVID-19 pandemic has affected schools' ability to plan for the new curriculum. This prompted the Welsh Government to offer secondary providers flexibility to delay starting to teach the new curriculum until September 2023. Nearly half of secondary, middle and special schools plan to introduce the new curriculum in September 2022.
- 12 Despite the disruption, the pandemic has led to some changes that have benefitted the developing curriculum. For example, suspending the curriculum in 2020 allowed schools to be more experimental, it resulted in schools giving priority to pupils' health and wellbeing, and teachers' and pupils' digital skills have also improved.
- 13 Once the primary legislation was in place in April 2021, the Welsh Government had a significant role supporting schools and others to prepare. This included finalising guidance to schools, ensuring that the secondary legislative framework was in place and that support was available to schools. Much of this work is now complete.
- 14 Although two terms later than planned, the Welsh Government's national network for curriculum implementation started work in Autumn 2021. In February 2022, the Welsh Government announced long-term support for schools on progression and assessment as well as support for developing bilingual resources and a national entitlement to professional learning for all school staff from September 2022. In October 2021, Qualifications Wales announced high-level details of GCSEs aligned with the new curriculum. Work is underway to co-design detailed qualifications.
- 15 Looking beyond September 2022, the key risks that the Welsh Government will need to continue to manage include:
  - financial and workforce pressures that could affect schools' ability to realise a high-quality new curriculum;
  - ensuring the new curriculum supports the Welsh Government's aim of reducing inequalities in education;
  - ensuring that new qualifications are aligned with the new curriculum and support progression to the full range of post-16 options;
  - ensuring greater engagement with parents, carers and learners; and
  - clarifying what information will be available to support a new approach to self-evaluation, improvement, accountability and transparency.



The new Curriculum for Wales represents a considerable change for learners, parents, carers and the education profession and, while the pandemic has understandably affected the timetable and schools' preparations, September 2022 will mark a major milestone. The spirit in which the curriculum has been developed is good to see, but future policy development on this scale needs to give more attention to the likely costs of implementation to provide for an earlier and fuller assessment of value for money.

Some significant work is still needed in key areas to deliver the full benefits of curriculum reform and the Welsh Government will need to keep track of the substantial ongoing costs of the reform programme to support wider scrutiny.

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**Adrian Crompton**  
Auditor General for Wales



# Key facts



## Settings

- 550** funded non-maintained early years settings
- 1,219** primary schools
- 182** secondary schools
- 23** all-age schools (3-16 or 3-19)
- 35** special schools
- 10** pupil referral units



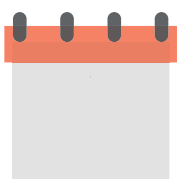
## Costs

- £159 million** estimated direct costs 2015-16 to 2020-21
- £198.5 million** estimated direct costs 2021-22 to 2030-31 (ranging £184 million - £213 million)
- £263 million** estimated opportunity costs for schools, 2021-22 to 2025-26 (ranging £131 million - £394 million)



## Staffing

- 23,941** qualified teachers (full-time equivalent)
- 23,779** support staff (full-time equivalent)



## Key milestones

- September 2022** first teaching of the new curriculum in primary schools and optional for year 7
- September 2023** mandatory for years 7 and 8 in secondaries and other settings
- 2026/27** first qualifications awarded



# Recommendations

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## Recommendations

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### **To better understand and to support scrutiny of the cost of curriculum reform**

**R1** It has not been easy for the Welsh Government or us to identify expenditure on curriculum reform to date. In part this is because of difficulties in calculating expenditure specific to curriculum reform as opposed to other elements of the education reform programme, or the Renew and Reform programme, some of which may benefit curriculum reform. However, understanding the cost of curriculum reform is vital to support scrutiny and inform any consideration of value for money.

We recommend that the Welsh Government monitors and reports annually on the costs of its curriculum reform programme including costs to partners and schools. In developing and reporting on its best estimate, the Welsh Government will need to consider the impact of any additional data collection on schools in particular.

### **To evaluate the effectiveness of the professional learning programme and support to schools**

**R2** The Welsh Government has funded professional learning aligned to the new curriculum alongside its wider investment in teachers' professional learning. It has also funded the regional education consortia and partnerships to provide bespoke support for schools. It recently announced a national entitlement to professional learning for all teachers and teaching assistants.

We recommend that the Welsh Government ensures that the effectiveness and value for money of its investment in professional learning for teachers and other school staff is evaluated.

## Recommendations

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### **To design and implement new qualifications that support the Welsh Government's ambitions for the new curriculum**

**R3** The Welsh Government and Qualifications Wales know that qualifications need to change to align with the new curriculum. Qualifications Wales is working with schools, further and higher education and others to co-design the new GCSEs and, subsequently, other qualifications. The detail of the qualifications and forms of assessment is not yet decided.

We recommend that the Welsh Government works with Qualifications Wales to:

- a monitor teachers' and learners' participation in developing the new qualifications;
- b plan an effective national professional learning programme that will support teachers to deliver the new qualifications; and
- c assess the resources needed for professional learning for the new qualifications and any changes to the assessment process, including any greater role for teacher assessment and/or digital technology.

### **To evaluate the effectiveness of schools' engagement with parents, carers and learners**

**R4** A positive impact of the pandemic has been to strengthen engagement between schools and families in many cases. Schools will be required to engage with parents and carers about the curricula. Parents, carers and learners should be able to participate in schools' evaluation and improvement. This is underway in some schools.

We recommend that the Welsh Government supports schools to engage effectively with parents, carers and learners and evaluates how well schools are doing this to support improvement.

## Recommendations

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### **To establish the information needed for a rounded understanding of schools' activities and outcomes**

**R5** Work to support a national approach to self-evaluation is due to be completed by the end of the 2021/22 academic year. There is less clarity about the process for democratic accountability and transparency, including what information will be available to governors, local or diocesan authorities, parents, carers and the public.

We recommend that the Welsh Government:

- a establishes what information those charged with holding schools to account, require as part of a new approach to accountability; and
- b sets out details on how it will ensure transparency for parents, learners and the public.

### **To ensure the new curriculum remains fit for purpose**

**R6** The Curriculum and Assessment (Wales) Act 2021 introduces a requirement for Ministers to keep the new curriculum under review. It does not set out the mechanism for cyclical review.

We recommend that, once the milestone of first teaching of the new curriculum is achieved, the Welsh Government sets out how it intends to keep the curriculum under review to ensure that it can become embedded and yet remain fit for purpose.



**Initial planning:  
The curriculum is  
central to the Welsh  
Government's  
long-term programme  
of education reform  
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developed without  
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or opportunity costs**

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**01**

- 1.1 Curriculum reform is central to a wider, long-term programme of educational reform in Wales (**Exhibit 1**). This part of the report looks at the background to the new curriculum and what is known about its actual and estimated costs.

### Exhibit 1: the four enabling objectives of education reform in Wales



**Developing a high-quality education profession.**



**Inspirational leaders working collaboratively to raise standards.**



**Strong and inclusive schools committed to excellence, equity and well-being.**



**Robust assessment, evaluation and accountability arrangements supporting a self-improving system.**

Source: Welsh Government, Education in Wales: Our national mission, Action plan 2017-21, September 2017

### **Curriculum reform is central to a wider education reform programme that the Welsh Government has been undertaking over the past decade or so**

- 1.2 In December 2010, disappointing PISA test results<sup>2</sup> sparked national debate about education in Wales. Results in mathematics and reading were below the average of 65 participating countries. Mean scores in mathematics, reading and science in Wales were significantly lower than other UK nations.

2 The Programme for International Student Assessment (PISA) is a study of educational achievement organised by the Organisation for Economic Co-operation and Development (OECD). PISA provides governments with a benchmark for education policy and performance, to make evidence-based decisions and to learn from one another. It supports transparency.

- 1.3 The programme of education reform began in February 2012 when the Welsh Government announced changes including national literacy and numeracy frameworks and national testing. **Appendix 2** provides a timeline of key activities in developing and implementing the curriculum.
- 1.4 The Welsh Government announced a review of curriculum and assessment in October 2012. At that time, learners in Wales followed a national curriculum first established by the Education Reform Act 1988. Successive governments amended and added to it, notably in 2008 when the Welsh Government introduced the Foundation Phase (3-7 year olds) and the Curriculum for Wales for key stages 2-4 (7-16 year olds)<sup>3</sup>.
- 1.5 In March 2014, the Welsh Government announced a comprehensive review of curriculum and assessment arrangements<sup>4</sup>. It was to be led by Professor Graham Donaldson, formerly Chief Education Advisor to the Scottish Government, who had influenced the curriculum reform programme in Scotland. His February 2015 report<sup>5</sup> set out an approach to education for 3-16 year olds in Wales. The Welsh Government accepted his recommendations. **Exhibit 2** sets out the main elements of the new Curriculum for Wales.

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3 The Education (National Curriculum) (Attainment Targets and Programmes of Study) (Wales) Order 2008

4 Welsh Government, Written Statement – Review of Assessment and the Curriculum, March 2014

5 Donaldson, G., Successful Futures: Independent Review of Curriculum and Assessment Arrangements in Wales, February 2015

## Exhibit 2: about the new Curriculum for Wales

- A curriculum is all the learning experiences and assessment activities planned to achieve agreed education aims.
- The new Curriculum for Wales is an integrated curriculum for 3-16 year olds. It applies to all settings (including special schools and pupil referral units which are not required to follow the current curriculum).
- The Curriculum and Assessment (Wales) Act 2021 and regulations provide the legal basis.
- A new curriculum framework has been co-designed, with teachers and schools taking a key role. It is built on four purposes, to develop learners who are:
  - ambitious and capable;
  - enterprising and creative;
  - ethical and informed; and
  - healthy and confident citizens.
- Teachers have more flexibility to develop a curriculum in their school that meets their learners' needs. They are doing this using a common framework with six Areas of Learning and Experience (Areas): Mathematics and Numeracy; Science and Technology; Humanities; Languages, Literacy and Communications; Health and Well-being; and Expressive Arts.
- The broad requirements are set out in 27 statements of 'What Matters' in the Areas. Curriculum design breaks down traditional subject-to-subject boundaries to help learners consider different concepts and issues in the broadest possible way.
- Literacy, numeracy and digital skills cross all the Areas.
- The Areas support cross-curricular planning, so learners can apply learning to different academic or real-life situations.
- Qualifications Wales, the independent regulator of qualifications (other than degrees) for Wales, is developing qualifications to reflect the Curriculum for Wales through a co-construction approach.

Source: Audit Wales

1.6 In October 2015, the Welsh Government set out its ambition that the new curriculum could be available to schools as early as September 2018 with every school teaching it by September 2021<sup>6</sup>. With hindsight, the ambition that the new curriculum would be available for 2018 was unlikely; experience from other countries suggests that curriculum changes take a long time<sup>7</sup>.

<sup>6</sup> Welsh Government, *Qualified for life: A curriculum for Wales - a curriculum for life*, October 2015

<sup>7</sup> Mills, B., *How leading education nations develop and reform their curriculums*, Education Policy Institute, January 2021<sup>8</sup>

- 1.7 In September 2017, the Welsh Government published a revised implementation plan, delaying the date for starting to teach the new curriculum to September 2022 in primary schools and year 7. Alongside curriculum development, the Welsh Government gave timelines for other reforms vital to the successful implementation of the curriculum, including new professional standards for teaching in 2017 and on-going learning and qualification reform.

### **The Welsh Government did not assess the direct or opportunity costs when it began to develop the new curriculum**

- 1.8 We have not seen evidence that any assessment of direct or opportunity costs associated with curriculum reform was undertaken before the introduction of draft legislation. The Welsh Government had to estimate the sunk costs incurred by itself, some partner organisations and schools, to inform the regulatory impact assessment (RIA) for the Curriculum and Assessment Bill 2020 (the Bill) in July 2020. It collected this information retrospectively and some partners did not provide information. The Welsh Government also included in the RIA estimates of the future direct and opportunity costs for the new curriculum. It revised its estimates on sunk and future costs several times during scrutiny, with updates to the RIA in September 2020, and then February and April 2021.
- 1.9 We recognise that it is difficult to reliably identify expenditure. Partly, this is because the curriculum had been in development since 2015 and because expenditure was intertwined with other 'expenditure' when the RIA was prepared. This was particularly true for costs to schools where they incurred additional and opportunity costs not directly met by Welsh Government funding.
- 1.10 The RIA compared the cost of curriculum reform with maintaining the current arrangements but did not consider any alternative options for achieving the Welsh Government's ambitions other than total reform of the existing curriculum. This failure to document other options led the Senedd Finance Committee to state that 'RIAs often seem to be a "by-product" of the decision-making process, rather than driving it'. Following requests for better financial information from the Senedd Finance and Children, Young People and Education committees, the Welsh Government provided revised estimates in February and April 2021. Its estimate of sunk costs increased from £114 million to £159 million, driven by a 51% increase in its estimate of its own expenditure (**Exhibit 3**).

### Exhibit 3: Welsh Government estimates of the direct sunk costs of curriculum reform, 2015-16 to 2020-21<sup>1, 2, 3</sup>

	RIA estimate, July 2020 (£ millions)	Revised RIA estimate, April 2021 (£ millions)	% change between estimates
Welsh Government	89.1	134.1	51%
Qualifications Wales	1.7 <sup>4</sup>	1.4	-18%
Estyn	4.4	4.4	0
Regional education consortia	15.5	15.5	0
National Academy for Educational Leadership	3.3	3.3	0
<b>Total</b>	<b>114.1</b>	<b>158.7</b>	<b>39%</b>

#### Notes:

- 1 Excludes costs to the Catholic Education Service, Church in Wales and Wales Association of Standing Advisory Councils for Religious Education associated with the consultation on religion, ethics and values.
- 2 Excludes costs of education reforms not directly associated with the new curriculum but that will have contributed to it, including initial teacher education reforms, establishing the National Academy of Educational Leadership, learner assessment and early years and foundation phase support.
- 3 Excludes costs associated with Welsh language changes which are attributed to achieving the goals of Cymraeg 2050. Costs to parents from additional inset days are attributed to the Education (School Day and School Year) (Wales) (Amendment) Regulations 2019.
- 4 Figure is incorrectly recorded as £3,459,000 in Table 5 of the Explanatory Memorandum. We have adjusted the total figure and removed £1.7 million of costs incurred in 2015-16 and 2016-17 attributable to the previous GCSE reform.

Sources: Audit Wales analysis of Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes, July 2020 and Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes (revised), April 2021

- 1.11 The Welsh Government's estimates of future direct costs to schools in its RIA are subject to broad ranges. They also omit costs to some partners and settings including special schools, pupil referral units and early years settings. Again, the Welsh Government provided revised figures in February 2021 and April 2021.
- 1.12 An evaluation in 2017 highlighted that pioneer schools (see **paragraph 2.2**) varied in how, and if, they monitored the time and resources used in curriculum related work. Some were not asked to collect any information on resources used. Better monitoring of time and resources required at that point by pioneer schools would have informed national roll-out<sup>8</sup>. Instead, this information is based on estimates from a small number of pioneer schools, collected retrospectively in late 2019. As a result, the Welsh Government estimated the future direct costs of curriculum reform as £198.5 million between 2021-22 to 2030-31, but this estimate varied from £184 million to £213 million (**Exhibit 4**). Three-quarters of this expenditure falls between 2021-22 and 2025-26.

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8 Arad Research (2017). Formative Evaluation of the Pioneer Schools Model: Paper on Strand 1 and early Strand 2 activity. Cardiff: Welsh Government, GSR report number 72/2017

**Exhibit 4: Welsh Government estimates of future direct expenditure on curriculum reform, 2021-22 to 2030-31<sup>1</sup>**

		RIA estimate, July 2020 (£ millions)	Revised RIA estimate, April 2021 (£ millions)	% change between estimates
Welsh Government		175.4	162.6	-7.3%
Qualifications Wales <sup>2</sup>		6.5	6.8	4.6%
Schools	Low	14.5	14.5	0.0%
	Central	29.1	29.1	0.0%
	High	43.6	43.6	0.0%
<b>Total</b>	<b>Low</b>	<b>196.4</b>	<b>184.0</b>	<b>-6.3%</b>
	<b>Central</b>	<b>211.0</b>	<b>198.5</b>	<b>-5.9%</b>
	<b>High</b>	<b>225.5</b>	<b>213.0</b>	<b>-5.5%</b>

Notes:

- 1 Excludes costs falling to local authorities, diocesan authorities, some education settings and non-maintained early years settings. Also excludes costs associated with curriculum but not directly related such as digital infrastructure.
- 2 The revised estimate from Qualifications Wales represents slippage of £300,000 from 2020-21 to 2021-22. **Exhibit 3** shows a corresponding reduction.

Sources: Audit Wales analysis of Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes, July 2020 and Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes (revised), April 2021

## Direct costs look likely to be at the high end of, or more than, the Welsh Government's April 2021 estimates and opportunity costs are substantial

- 1.13 During plenary debate in March 2021, the Welsh Government agreed to provide the Senedd with updated and more complete information on future costs. This was included in a briefing to the Senedd Children, Young People and Education Committee in January 2022<sup>9</sup> and within commentary on the Welsh Government's 2022-23 draft budget<sup>10</sup>.
- 1.14 As acknowledged in **paragraph 1.9**, it is difficult to isolate expenditure on curriculum reform from other, closely aligned expenditure in the wider 'Our National Mission' programme and the current Renew and Reform programme. For example, the Welsh Government includes £15 million of its £74 million total spend on teachers' professional learning to curriculum reform but all improvements to professional learning will benefit the new curriculum at least indirectly.
- 1.15 We also accept that it is difficult to separate spending on elements such as progression and assessment associated with the pandemic response from that required by the new curriculum. However, simply comparing future budgets against revised RIA estimates suggests that spending is likely to be at the higher end of estimates, and in some years above estimates (**Exhibit 5**). This echoes our 2020 finding in other areas that RIAs tend to underestimate the cost of legislation<sup>11</sup>.

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9 Welsh Government, Evidence paper on Draft Budget 2022-23 – Education and Welsh Language Main Expenditure Group to the Senedd Children, Young People and Education Committee, January 2022

10 Welsh Government, Draft Budget 2022-23: A Budget to build a stronger, fairer and greener Wales, December 2021

11 Auditor General for Wales, Better law making: the implementation challenge, September 2020

### Exhibit 5: Welsh Government budgeted expenditure on curriculum reform, 2021-22 to 2024-25

	2021-22 (£ millions)	2022-23 (£ millions)	2023-24 (£ millions)	2024-25 (£ millions)
Revised RIA estimate, April 2021	23.8 - 36.6	23.6 - 33.8	20.1 - 23.3	19.1 - 20.7
Welsh Government budgeted expenditure	34.9	35.0	34.5	30.9

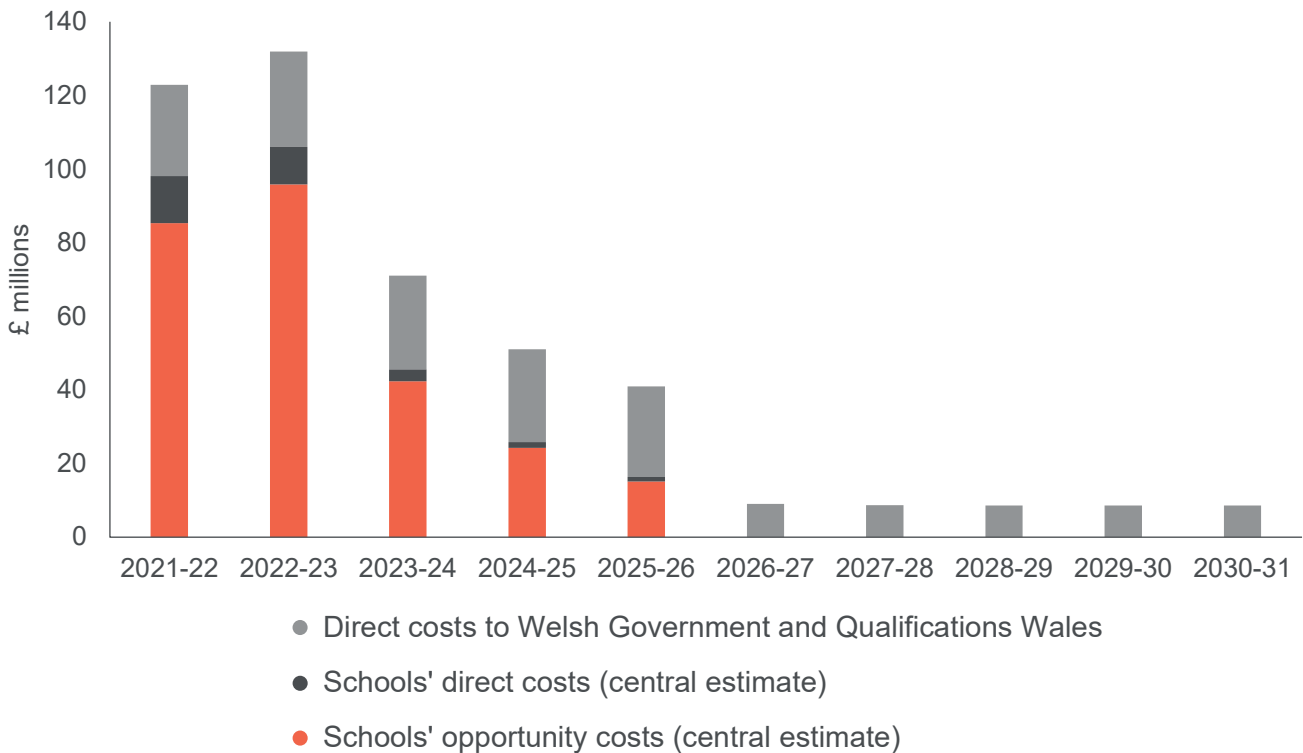
Note: These figures were compiled by the Welsh Government. The figures include professional learning directly related to the new curriculum, new materials and resources, costs to Qualifications Wales, Welsh Government administration costs and schools' direct costs including cover for staff absence.

Sources: Welsh Government, Ministers' written evidence to Senedd scrutiny committees on allocations within each MEG, Children, Young People and Education Committee, December 2021; Welsh Government, Draft Budget 2022-23: A Budget to build a stronger, fairer and greener Wales, December 2021 Annex G; Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes (revised) April 2021

- 1.16 In 2022-23, the Welsh Government's budget includes £35.05 million for curriculum reform. This is higher than the estimated expenditure in the RIA for 2022-23 (between £23.6 million and £33.8 million). Budgeted expenditure in 2023-24 and 2024-25 is also higher than RIA estimates.
- 1.17 The 2022-23 budget includes £5.3 million for progression and pupil wellbeing, taking forward work in 2021-22 funded through its Renew and Reform allocation. The RIA estimate did not include additional funding for new progression and assessment arrangements compared to the existing arrangements. However, schools have expressed a need for more support on progression and assessment and the Welsh Government told us that there have been additional demands to assess pupils' progression due to the pandemic. The total does not include the cost of any software that schools might choose to buy to support their new assessment procedures and/or to replace existing software aligned to the current curriculum, which would be met from delegated school budgets.
- 1.18 The budget does not include additional funding for supporting schools to implement the new qualifications. This will need to be reviewed in 2023 and onwards when Qualifications Wales considers the implications of changes to wider qualifications for learners aged 14-16 and A levels and announces further details about the content and form of assessment for new GCSEs. It will also need to consider any increased costs for awarding bodies or consequential increases in entry fees.

1.19 On top of the direct costs of curriculum reform, schools face substantial opportunity costs. These represent the time staff are not available for other work because they are doing activities related to the new curriculum and which is not covered by Welsh Government grants for supply teachers to replace them. The Welsh Government estimates that the opportunity costs associated with curriculum reform are £263 million between April 2021 and March 2026 (ranging from £131.4 million to £394.4 million) (**Exhibit 6**). Opportunity costs are estimated to be nine times the direct costs to schools in this period.

**Exhibit 6: Welsh Government estimates of the cost of the new curriculum including opportunity costs to schools, 2021-22 to 2030-31**



Note: Figures take account of inset days and the additional inset day for curriculum reform in 2021/22.

Source: Audit Wales analysis of Welsh Government, Curriculum and Assessment (Wales) Bill, Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes (revised) April 2021

- 1.20 We estimate the opportunity costs to be equivalent to 1.4 million days between April 2021 and March 2026<sup>12</sup>. The RIA shows most of the opportunity costs falling in 2021-22 and 2022-23. However, there is a risk that some opportunity costs slip to later in the period as secondary providers take advantage of the flexibility to delay adopting the new curriculum for year 7.
- 1.21 Previously we questioned if schools could absorb this time without impacting on the progress of current learners and/or staff wellbeing. We also expressed doubt about whether sufficient cover staff would be available, given higher demand for cover for COVID-19 absences and due to the recruitment of around 1,800 staff for recovery support<sup>13</sup>. The Welsh Government expected opportunity costs to be absorbed in various ways, including through innovative practice and collaboration. We understand that research on schools' readiness, due to be published soon, will reflect in part on how schools have managed workload pressures associated with the new curriculum.

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12 Figures are calculated assuming a cost of £180 a day for supply teachers hired through the Welsh Government's framework contract in 2020-21. Subsequent years assume a 2.5% annual pay rise.

13 Auditor General for Wales, Response to the Senedd Children, Young People and Education Committee's consultation on the Curriculum and Assessment (Wales) Bill, September 2020. The figures used in this report are amended to include an allowance for the 2020-21 pay award.



**Preparing for implementation: The Welsh Government worked well with the education profession to co-design the curriculum although the pandemic has affected the timetable and schools' ability to prepare**

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**02**

- 2.1 This part of the report looks at the development of the new curriculum and how the Welsh Government has supported schools preparing to implement it ahead of teaching from September 2022.

### **The Welsh Government and regional education consortia worked with schools to co-design the new curriculum and identify the skills and knowledge required to realise it**

- 2.2 In October 2015, the Welsh Government set out its plans for networks of pioneer schools. The first network consisted of 68 curriculum pioneer schools focused on designing the new curriculum, supported by regional education consortia. This approach enabled schools to lead curriculum development, although a subsequent Welsh Government-commissioned evaluation found not all pioneer schools understood this expectation at the outset.
- 2.3 It took time to get a balance between practitioner ownership and strategic support and direction. Initially progress was slow, and, over time, the Welsh Government became increasingly involved in co-ordinating and supporting schools, consortia and other partners. It was easier for primary schools to develop and test a whole school approach to the new curriculum, partly because there were similarities between it and the existing foundation phase and because they were not constrained by examinations<sup>14</sup>.
- 2.4 A second network of 60 professional learning pioneer schools focused on identifying the skills and knowledge teachers need to realise the new curriculum and developing new professional standards for teachers. Both pioneer school networks formally ended in 2019 although a subset of 16 'innovation schools' continued to consider the draft curriculum into 2020. A report from Estyn in March 2022 showed that the majority of schools not in the pioneer schools network said they were not kept informed of national developments regularly enough<sup>15</sup>.
- 2.5 The Welsh Government provided £7.4 million to support pioneer and innovation schools in 2018-19 and 2019-20. Funding allowed schools to release one member of staff for two days a week in the early stages. The Welsh Government-commissioned evaluation found that, while initially adequate, schools later reported that they were spending more than two days a week and many practitioners did some curriculum work in their own time.

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14 Arad Research in association with ICF Consulting Limited, Formative Evaluation of the Pioneer School Model: Final Report, July 2018

15 Estyn, The Curriculum for Wales – How are regional consortia and local authorities supporting schools? March 2022

- 2.6 The Welsh Government recognises that co-designing the new curriculum took a long time. The approach was a new way of working for all involved. The 2018 evaluation found that it took time to find the appropriate balance between practitioner ownership and strategic support and direction. Over time, strategic leadership improved, with more shared responsibility for co-constructing the new curriculum arrangements between partners at all levels.

### **The Welsh Government has funded a programme of professional learning and support to schools linked to the new curriculum although its effectiveness is not clear**

- 2.7 The OECD has emphasised the centrality of improving teaching to reforming education in Wales<sup>16</sup>. In December 2020, Estyn found that, while there were some strengths, teaching and learning experiences required improvement in around a quarter of primary schools and just under half of secondary schools inspected<sup>17</sup>. The Welsh Government's wider reform programme includes several initiatives aiming to improve teaching standards aligned with the new curriculum, including changes to initial teacher education and the 2017 new professional standards for teachers<sup>18</sup>. In 2021, the OECD recognised that there has been a high level of commitment to teachers' professional learning within the Welsh Government's Education Directorate<sup>19</sup>.
- 2.8 The Welsh Government has supported a professional learning programme specifically to equip teachers with the knowledge and skills they need to understand the new curriculum, take on the new role of curriculum designers and realise the new curriculum. It provided just over £24 million to consortia in 2020-21 and 2021-22 (**Exhibit 7**). This included core funding for the consortia's work on curriculum reform, for support to individual schools and professional learning related to the new curriculum. The Welsh Government also provided £12 million to the consortia and local authorities to allow schools to release staff for professional learning activities, some of which will be related to the new curriculum.

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16 OECD, Improving schools in Wales: an OECD perspective, April 2014; OECD, The Welsh Educational Reform Journey: A rapid policy assessment, 2017; National Foundation for Educational Research and ARAD Research, A Rapid Evidence Assessment on the Impact of Curriculum and Assessment Arrangements within High Performing Countries, Welsh Government Social Research 65/2013

17 Estyn, The Annual Report of Her Majesty's Chief Inspector of Education and Training in Wales 2019-20, December 2020

18 Arad Research, Evaluation of the professional standards for teaching, leadership and assistant teaching: Year 1 report, November 2021

19 OECD, Teachers' professional learning study: Diagnostic report for Wales, July 2021

### Exhibit 7: Welsh Government funding to regional education consortia and partnerships for work directly related to the new curriculum<sup>1,2,3</sup>

	2020-21 (£ millions)	2021-22 (£ millions)
Curriculum and assessment support to schools	3.9	9.8
Core support to consortia on design and development of the new curriculum	1.8	1.2
Professional learning directly related to the new curriculum	2.3	5.2
<b>Total</b>	<b>8.0</b>	<b>16.2</b>

#### Notes:

- 1 This funding was distributed to the three regional education consortia and local authorities formerly in the Education through Regional Working consortium mostly based on an agreed formula.
- 2 Total excludes funding for general professional learning and activities related to the Renew and Reform programme that are not directly related to the new curriculum but are likely to support the development of it.
- 3 Going forward, the regional consortia have adjusted their activities and structures to support curriculum reform and do not expect further costs.

Source: Audit Wales analysis of data provided by the Welsh Government, January 2022

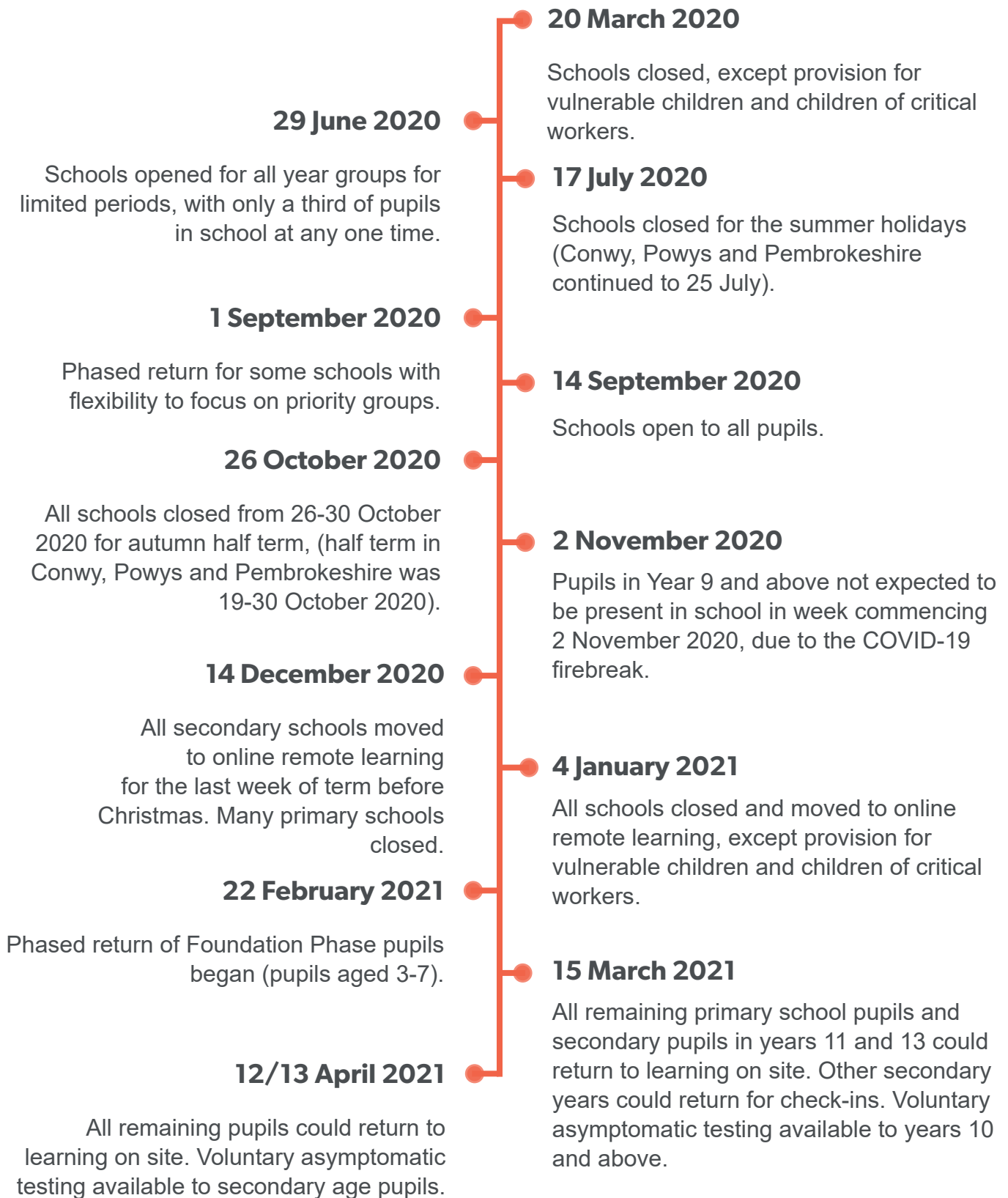
2.9 The professional learning work was paused in the early stage of the pandemic but has since increased in scale and pace. Much has been delivered online. Consortia and local authorities had freedom to develop support that meets their local priorities. This focus on supporting schools marks a change from the original focus of the consortia on providing challenge to schools. In 2021, the OECD found that this shift in approach was not always clear at school level (see **footnote 19**). They cautioned that ‘creating a system based on trust will be harder if consortia are still associated with the old model of top-down accountability’.

- 2.10 The Welsh Government asked Estyn to review consortia and local authorities' support for schools on the new curriculum. In work undertaken in Autumn term 2021 and reported in March 2022, Estyn found schools had been supported to develop their vision for teaching and the new curriculum (see **footnote 15**). Estyn also found schools would welcome more practical professional learning opportunities to help them understand how they can design and realise the new curriculum. Estyn recommended that the Welsh Government considers approaches to enable the regional consortia and local authorities to better evaluate the impact and outcomes of their work supporting curriculum and teaching and be held to account for it. The Welsh Government plans to establish a working group to consider this issue as part of a review of the National Approach to Professional Learning.
- 2.11 School improvement services in South-West Wales have changed in recent years. Until it was formally disbanded in August 2021, the Education through Regional Working (ERW) consortium included Neath Port Talbot, Swansea, Carmarthenshire, Pembrokeshire, Ceredigion and Powys councils. Neath Port Talbot Council gave notice to leave the consortium in March 2019. The other councils subsequently left.
- 2.12 Pembrokeshire, Swansea, and Carmarthenshire councils have formed the Partneriaeth consortium in which curriculum and innovation forms a key area of work. Ceredigion and Powys councils have formed the Mid-Wales Education Partnership, underpinned by a memorandum of understanding. Neath Port Talbot is not in a consortium or partnership. After leaving ERW, Ceredigion, Powys and Neath Port Talbot no longer have access to any new materials produced by consortia. In February 2022, the Welsh Government announced that, from September 2022, materials published by any consortia will be available to all through the Hwb, the Welsh Government's digital learning platform. In March 2022, Estyn commented that, while Partneriaeth, the Mid-Wales Education Partnership and Neath Port Talbot Council are developing suitable structures to support their schools, their work was in the early stages of development, and it was too soon to measure its impact.
- 2.13 Professional learning is available to teaching assistants or supply teachers although they face more difficulties in accessing resources. In February 2022, the Welsh Government announced a 'national entitlement' for teachers and teaching assistants to high-quality support and resources accessed through the Hwb and regional consortia and partnerships. It said that detail of this entitlement will be available by the beginning of the 2022/23 academic year.

## **The COVID-19 pandemic has affected schools' ability to plan for the new curriculum, prompting the Welsh Government to offer some flexibility to secondary providers to delay implementation**

### **The COVID-19 pandemic initially reduced schools' ability to respond to the draft new curriculum published in January 2020**

2.14 The Welsh Government published draft guidance on key areas of the new curriculum in January 2019 and a draft new curriculum framework in April 2019. After detailed consultation, it published updated versions in January 2020. This should have kick-started intensive work by schools to develop their own curricula. However, schools were not able to make progress as concerns about the COVID-19 pandemic grew, with schools closing to pupils in March 2020 (**Exhibit 8**). Schools and teachers prioritised supporting pupils' wellbeing and adjusting to remote learning and, in secondary schools, to delivering centre-assessed grades when 2020 exams were cancelled.

**Exhibit 8: national school closures in Wales, March 2020 to April 2021**

Note: Some schools and local authorities had additional periods of closure.

Source: Welsh Government, Timeline of school closures during the coronavirus (COVID-19) pandemic, March 2020 to April 2021

2.15 The Welsh Government diverted many civil servants to work related to the pandemic but continued to treat the new curriculum as a priority. It updated its 'Education in Wales: Our national mission, Action Plan' in October 2020 with revised milestones for the whole educational reform programme. It also published 'Curriculum for Wales: the journey to 2022' outlining key activities for schools in each term to September 2022.

**The Welsh Government responded to concerns about the readiness of some schools by offering secondary providers flexibility to delay their implementation of the new curriculum**

2.16 The plans outlined in 'Journey to 2022' did not allow for any further impact from the COVID-19 pandemic. However, most schools experienced significant disruption in the autumn term 2020, all moving to remote learning in January 2021. Secondary schools delivered centre-determined grades again in 2021. In July 2021, Estyn reported that secondary schools<sup>20</sup>, special schools and pupil referral units<sup>21</sup> varied widely in their preparations for the new curriculum. Primary school leaders sought reassurance that schools would not be expected to have their curriculum finalised by September 2022 but would be able to refine their curricula over time<sup>22</sup>.

2.17 An internal review of its own readiness for implementing the new curriculum concluded that the Welsh Government's work programme was mostly on-track but expressed concerns about some partners' and schools' readiness. The unpublished review highlighted the importance of being clear about the timetable. It also highlighted the urgent need for clarity about assessment and qualification decisions, seen as a major obstacle to secondary schools engaging fully with curriculum development.

2.18 In July 2021, the Welsh Government confirmed that roll-out of the new curriculum in primary schools would start as planned in September 2022<sup>23</sup>. However, it will be optional for secondary, 3-16 schools, special schools and pupil referral units until September 2023 when it becomes compulsory for years 7 and 8 and other settings. The Welsh Government also announced additional funding of £7.2 million and measures to reduce teachers' workload to create space for work related to the new curriculum<sup>24</sup>. Most stakeholders welcomed this flexibility, although some told us that there should not be any further delays so learners can benefit from the new curriculum which has been a long time in the making.

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20 Estyn, Engagement work: Secondary sector update, Summer term 2021, July 2021

21 Estyn, Engagement work: Maintained special school and pupil referral unit (PRU) update, Summer term 2021, July 2021

22 Estyn, Engagement work: Primary sector update, Summer term 2021, July 2021

23 Welsh Government, Oral statement: Curriculum reform – Next Steps, July 2021

24 These measures included further suspending assessments in primary schools which had been paused in 2020, delaying the restarting of Estyn inspections and making some changes to the first year of planned additional learning needs reforms.

2.19 In June 2021, the Welsh Government published its Renew and Reform programme<sup>25</sup> for supporting wellbeing and progression during the pandemic. In September 2021, the Welsh Government published its revised 'Curriculum for Wales: the journey to curriculum roll-out'. This superseded 'Journey to 2022', recognising the impact of ongoing disruption since October 2020 and more clearly integrating work on the new curriculum with work to recover from the impact of the pandemic. It sets out at a high level what schools need to do before starting to teach the new curriculum, making clear that this is the start of a cyclical process for schools of reviewing and refining their curricula. Nearly half of secondary, middle and special schools plan to introduce the new curriculum in September 2022.

**Additional work caused by the COVID-19 pandemic is reducing schools' ability to prepare for the new curriculum, but the pandemic has led to some beneficial changes**

2.20 Teachers and school leaders strongly support the new curriculum. In summer term 2021, 98% of senior leaders and 78% of practitioners agreed they were committed to the aspirations of the Curriculum for Wales. However, fewer felt that their schools were well-placed to design their own curriculum or to change their professional practice ahead of September 2022<sup>26</sup>. Two-thirds (67%) of school leaders and practitioners wanted additional support and/or resources ahead of roll-out. They wanted additional time to develop resources, access tailored professional learning opportunities, engage in reflection and preparatory work to refine teaching strategies and collaborate with other schools. They asked for more guidance and support relating to expectations around assessment and progression. A report submitted to the Welsh Government in November 2021 and published recently also identified concerns about support for leaders around the new curriculum<sup>27</sup>.

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25 Welsh Government, Renew and reform: supporting learners' wellbeing and progression, Our education COVID-19 recovery plan, June 2021

26 Arad Research, Practitioner Survey on preparations for the roll-out of the Curriculum for Wales: final report, January 2022. 81% of leaders and 53% of practitioners felt they were well placed to design their own curriculum for September 2022. 86% of senior leaders and 53% of practitioners considered that their school was well-placed to make changes to their professional practice ready for September 2022.

27 Harris, A., Hutt, M., Jones, M. and Longville, J, Independent review of leadership: Final report, Welsh Government, May 2022

- 2.21 In July 2021, Estyn reported that primary school leaders believed their schools needed a prolonged, uninterrupted period to develop their curricular approaches (see **footnote 22**). A survey in June and July 2021 found that 54% of senior leaders and 62% of practitioners said there had not been time in the school timetable for curriculum work<sup>28</sup>. The flexibility for secondary schools to delay implementation, and the measures to create space in the school timetable were widely welcomed, but schools have continued to experience significant disruption in the 2021/22 academic year. Many schools have experienced high absence levels and continue to do so. In the week 4-8 April 2022, an average of 86.8% of all pupils were in attendance, falling to 81% of year 12 and to 72% of year 13 pupils. Schools have also struggled with high levels of staff absence, and some have had difficulty finding cover, causing some to temporarily close.
- 2.22 In December 2021, the Chief Inspector of Education and Training commented on the unprecedented level of pressure that school staff have faced during the 2020/21 academic year. While many persevered with the curriculum reform journey and other elements of the reform programme, she emphasised that no-one should underestimate the toll on staff.
- 2.23 Nobody knows how the pandemic will affect schools in the rest of 2022 and beyond. Estyn has emphasised that it is important for schools to continue to prioritise pupils' welfare<sup>29</sup>. The Welsh Government asked Estyn to engage with schools to review progress on the new curriculum in this challenging environment and requested information from consortia about their work with schools. Together this information can inform the Welsh Government's thinking about the future amid concerns about their ability to prepare for the new curriculum given the continuing pressures from the pandemic.
- 2.24 In July 2021, Estyn found that in most schools visited leaders were working effectively with stakeholders and spending considerable time developing a vision for their school and its pupils (see **footnotes 20-22**). Unsurprisingly, Estyn found that schools that had been pioneer schools were further ahead in their thinking and preparations than others, but they identified common barriers to progress (**Exhibit 9**).

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28 Arad Research, Practitioner Survey on preparations for curriculum and assessment reforms in 2022: interim findings primary and secondary senior leaders, September 2021

29 Estyn, The Annual Report of Her Majesty's Chief Inspector of Education and Training in Wales 2020-21, December 2021

**Exhibit 9: common barriers to progressing the new curriculum in schools**

- **Creating time for curriculum development and professional learning** – given the pressures of the pandemic on top of normal workload.
- **Not all teachers have taken part in the professional learning needed to understand the approach** – this had led some schools to design a curriculum without fully understanding the principles of the approach.
- **Uncertainty about future qualifications** – research commissioned by Qualifications Wales found that uncertainty about future qualifications and the balance between individual subjects or integrated Areas of Learning and Experience meant that some secondary schools were reluctant to progress<sup>30</sup>. Following public consultation, Qualifications Wales announced high-level decisions about qualifications in October 2021, bringing more clarity<sup>31</sup>. It said it would work with teachers and other stakeholders including learners to co-design qualifications that reflect the new curriculum.
- **Ways of working related to the pandemic** – school leaders said they found it more difficult to inspire change through remote meetings. It was more difficult to gauge the impact of new approaches to teaching and learning as schools have delivered a reduced curriculum in restricted circumstances since returning to in-person teaching.

Source: Audit Wales, analysis of work by Estyn (see footnotes 20-22) and Qualifications Wales (see footnote 29)

2.25 While the pandemic has caused difficulties for implementing the curriculum, it has also led to some beneficial changes. Suspending the national curriculum in March 2020 and the requirements for end-of-stage testing allowed schools to experiment and develop their curricula. Schools and teachers have prioritised the wellbeing of pupils, kickstarting work on the health and wellbeing Area of Learning and Experience for the new curriculum (see **Exhibit 2**).

30 Arad Research and the National Foundation for Educational Research, Qualified for the future, Summary of findings, June 2020

31 Qualifications Wales, Qualifications for the Future: Reimagining qualifications in Wales, October 2021

2.26 Teachers' digital skills improved rapidly as they had to adapt to remote learning, which is in line with the ambitions of the new curriculum. Similarly, many teachers recognised the need to develop pupils' digital and independent learning skills in readiness for the challenges of a more dynamic and experiential approach to learning. The Chief Inspector of Education and Training has suggested that the experience of responding to the pandemic has increased schools' and teachers' resilience and their appetite to do things differently (see **footnote 29**).

### **The Welsh Government had a challenging programme of work to complete before the September 2022 milestone, but this work is mainly complete**

2.27 The Welsh Government recognised it had a significant role supporting schools and others to prepare for the new curriculum once the primary legislation was in place in April 2021. Its work programme included finalising guidance to schools, ensuring that the secondary legislative framework was in place and making support available to schools. Much of this work is complete.

2.28 The Curriculum and Assessment (Wales) Act 2021 established the framework for the new curriculum and set out the requirements on headteachers and school governors. The Welsh Government published draft guidance for consultation on some key outstanding issues in May 2021, in part because the guidance needed to reflect debate and issues raised during scrutiny of the Bill. Topics included careers and work-related experience, early years settings (enabling pathways), the curriculum in non-maintained nurseries and cross-curricula skills (literacy, numeracy and digital skills).

2.29 The Welsh Government also published revised guidance on the controversial topics of religion, values and ethics (RVE) and relationships and sexuality education (RSE) in May 2021. During Autumn 2021 it laid final versions of the sub-ordinate legislation to enable the Curriculum and Assessment (Wales) Act 2021 before the Senedd and updated associated curriculum guidance. This provided greater certainty on these vital areas for schools as they were developing their curriculum.

- 2.30 The Welsh Government announced details of its national network for curriculum implementation in September 2021, two terms later than planned<sup>32</sup>. The national network is a major element of its support for schools, intended to facilitate collaboration and a national conversation for schools. The Welsh Government supports participation through its professional learning grant to schools. We were told that high levels of absence were reducing participation in initial conversations during early Autumn 2021. However, the Welsh Government told us that rates of participation subsequently increased.
- 2.31 The Senedd approved the Progression Code in December 2021, setting out what it means for learners to make progress under the new curriculum as they develop and improve skills and knowledge. In February 2022, the Welsh Government announced new national support for developing progression and assessment in the new curriculum and a three-year project to understand and develop progression and assessment (Camau I'r Dyfodol).



**Future risks: The Welsh Government is alert to some key risks and will need to continue to manage these to ensure the new curriculum realises its anticipated benefits**

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- 3.1 Introducing the new curriculum is not a ‘big bang’ event but an incremental process with a key milestone in September 2022. The Welsh Government will depend on other partners to realise the new curriculum, while it adopts a supporting role. Overshadowing all is the pandemic which continues to impact schools. This section of the report looks at the future key risks (**Exhibit 10**) and how the Welsh Government is responding to them. The Welsh Government recognises these risks, but we have made recommendations that highlight the importance of continuing to manage them.

**Exhibit 10: key risks that must be managed for the new curriculum to achieve its intended benefits**



**Financial and workforce pressures**

these could affect schools’ ability to realise a high-quality new curriculum.



**Inequalities**

ensuring the new curriculum supports the Welsh Government’s aim of reducing inequalities in education.



**New qualifications**

these will need to support the aims of the new curriculum and support progression to the full range of options available to post-16 learners.



**Engagement**

ensuring schools effectively engage with parents, carers and learners.



**Accountability, evaluation, improvement and transparency**

developing an approach that supports improvement as well as democratic accountability and transparency.

## Financial and workforce pressures could affect schools' ability to realise a high-quality new curriculum

### Financial pressures may reduce schools' ability to realise a high-quality curriculum

- 3.2 The Welsh Government's assessment of future costs in 2020 suggested the new curriculum will not require additional resources to the current curriculum other than for development work (see **Exhibit 4**). We think it would have been reasonable to assume there may be additional costs, at least from new requirements relating to modern foreign languages and careers education in primary schools which do not feature in the RIA cost estimate. But, putting this aside, in October 2021 we highlighted that school funding had fallen over the previous decade and many schools were struggling financially prior to the pandemic<sup>33</sup>. Together with the likelihood of tight public funding in future and competing pressures on council budgets, there is a risk that schools' ambitions for the new curriculum will be limited by tight or negative budgets.
- 3.3 Schools receive the majority of their funding from local authorities which, in turn, receive an un-hypothecated grant from the Welsh Government. A review of school funding in 2020 found that councils' delegated funding to schools varies across Wales after allowing for differences in learner and school characteristics<sup>34</sup>. The Welsh Government has not yet responded to the review.
- 3.4 In its report on the Welsh Government's 2022-23 budget<sup>35</sup>, the Senedd Children, Young People and Education Committee highlighted the concern of its predecessor committee about whether the local government settlement enabled local authorities to give adequate provision for school budgets. It recommended that the Welsh Government should clarify how Ministers work together with local authorities to ensure that schools receive sufficient funding to deliver on the Welsh Government's policy commitments, including the new curriculum.

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33 Auditor General for Wales, A Picture of Schools, October 2021

34 Sibieta, L., Review of School Spending in Wales, Welsh Government, October 2020

35 Senedd Children, Young People and Education Committee, The 2022-23 Welsh Government Draft Budget, February 2022

## **A shortage of teachers with Welsh language skills may hamper the Welsh Government's ambition to reform Welsh language teaching**

- 3.5 Extending Welsh language in schools and growing Welsh-medium education are key to the Welsh Government's ambitions to increase the number of Welsh speakers<sup>36</sup>. The Welsh Government has an ambition for an overarching approach to Welsh language; removing any distinction between first and second language speakers to create a single continuum from those with little or no exposure to Welsh to those working towards proficiency<sup>37</sup>. It had raised the possibility of one overarching qualification but that has proved difficult because learners have varying exposure to the Welsh language. In February 2022, Qualifications Wales announced three new Welsh language qualifications: combining Welsh language and literature for Welsh medium and bilingual schools; Welsh for English medium schools; and an additional qualification for learners in English medium schools who want more advanced Welsh.
- 3.6 However, the Welsh Government's ambitions are threatened by a longstanding lack of teachers who can teach Welsh and teach other subjects through the medium of Welsh. A July 2020 report on the teacher labour market found shortages in Welsh along with other subjects<sup>38</sup>. Estyn has previously found that Welsh medium schools face greater recruitment difficulties and have difficulty locating Welsh-speaking supply staff<sup>39</sup>.
- 3.7 Recent initiatives to attract people with Welsh-language skills do not appear to have led to a significant increase. The numbers of people starting initial teacher education either to teach in Welsh or who are fluent in Welsh increased in 2019/20 compared to the previous year but was still less than in 2014/15 (**Exhibit 11**). Education workforce statistics also show that the number of registered teachers able to speak Welsh (33.5% in 2021) or work through the medium of Welsh (27% in 2021) has remained fairly static over recent years<sup>40</sup>. The Welsh Government published a ten-year plan to tackle these issues in May 2022<sup>41</sup>.

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36 Welsh Government, *Cymraeg 2050 - A million Welsh speakers*, July 2017

37 Welsh language is a compulsory element of the current curriculum for key stage 2, 3 and 4. Currently, qualifications have different routes depending on whether Welsh is a first or second language.

38 National Foundation for Educational Research, *Teacher labour market in Wales annual report 2020*, July 2020

39 Estyn, *Effective management of school workforce attendance in primary schools*, January 2017

40 Education Workforce Council for Wales, *Annual education workforce statistics for Wales*, September 2021

41 Welsh Government, *Welsh in education workforce plan*, May 2022

### Exhibit 11: self-reported Welsh speaking ability and ability to teach in Welsh, students starting Initial Teacher Education

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Training to teach in Welsh	255	245	235	210	175	235
Fluent Welsh speaker	350	330	350	305	265	300

Source: Statistics for Wales, Initial Teacher Education in Wales, May 2021

### There is a risk that the new curriculum will not contribute to the Welsh Government's aim of reducing inequalities in education

- 3.8 The Welsh Government has stated that reducing the attainment gap – the difference in educational achievements between one group of learners and others – is a goal of the new curriculum<sup>42</sup>. On one important measure– the difference between GCSE results between those eligible for free school meals and others – the attainment gap widened between 2016 and 2021 at grades A\*-A for pupils eligible for free school meals and others. The gap at grades A\*-C also increased between 2016 and 2019 although it has reduced since. Other attainment gaps are observed between males and females, between ethnic groups and pupils with additional learning needs and others at GCSE.
- 3.9 Evidence presented to the Senedd Children, Young People and Education Committee in November 2019 has suggested that changing the curriculum was unlikely of itself to reduce the gap<sup>43</sup>. Research in pioneer schools<sup>44</sup> found that few teachers identified children from disadvantaged backgrounds as potentially benefitting from the new curriculum. Recognising there is a limit to the extent that any curriculum can tackle the multiple causes of unequal pupil attainment and that the Welsh Government plans to announce new measures to tackle the link between disadvantage and educational attainment, we think there is a risk that the new curriculum may fail to meet its equality goals. There is more work to do to understand how the new curriculum can contribute to reducing the gap.

42 Welsh Government, Curriculum and Assessment (Wales) Bill 2020 – Explanatory Memorandum, July 2020; Minister for Education, Plenary Debate - Curriculum and Assessment (Wales) Bill 2020, December 2020

43 Newton N., Evidence to the Senedd Children, Young People and Education Committee, November 2019

44 Newton N., Power, S and Taylor, C., Successful futures for all: Explorations of curriculum reform, Cardiff University, July 2019

- 3.10 There is also a risk that differences in schools' curricula will lead to inequalities. One of the arguments for introducing a national curriculum in the 1980s was to introduce more consistency in the curriculum offered by schools. However, over time amendments and additions were made, and the national curriculum came to be regarded more as a straitjacket, limiting professional autonomy. This balance between national consistency and local flexibility has been at the heart of debate about the new curriculum.
- 3.11 The previous Senedd Children, Young People and Education Committee recommended that the Welsh Government needs to be clearer about what checks and balances it will put in place to monitor whether learners receive a consistent, although not uniform, curriculum<sup>45</sup>. Collaboration within clusters, peer-to-peer support, the national network (see **paragraph 2.30**) as well as consortia and partnership oversight and inspection all have a role in ensuring consistency between schools, but we see this as an inherent risk that will continue to require oversight.

**The Welsh Government needs to continue to work with Qualifications Wales to ensure that new qualifications are aligned with the curriculum and allow progression to the full range of post-16 options**

- 3.12 The Welsh Government and Qualifications Wales recognised early on that qualifications would need to change to fit with ambitions for the new curriculum. The Welsh Government postponed this discussion until after the main features of the curriculum were decided to avoid the risk that qualifications would drive curriculum development. In recognising the need to change, the Welsh Government is managing the risk that qualifications become a barrier to successful implementation that has been observed in Scotland<sup>46</sup>.

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45 Senedd, Children, Young People and Education Committee, Stage 1 Scrutiny Report on the Curriculum and Assessment (Wales) Bill, December 2020

46 OECD, Scotland's Curriculum for Excellence - Into the future, June 2021

- 3.13 However, there is evidence from work by Estyn that some secondary schools slowed progress on developing their curricula because they were unclear about future qualifications (see **footnote 20**). Qualifications Wales consulted on the form of qualifications between November 2019 and February 2020. It told us that stakeholders expressed widespread support for learners aged 14-16 to continue to take formal qualifications, although there has been a call for significant changes to GCSEs<sup>47</sup>. In June 2020, Qualifications Wales announced that qualifications called GCSEs would continue but with reformed content and assessment to support the new curriculum. In October 2021 it announced high-level decisions on the new range of GCSEs that will be created. These include new qualifications (such as engineering, and film and digital media), merging existing qualifications (mathematics and numeracy and English language and literature) and a new double science qualification to replace all current science options.
- 3.14 Some stakeholders expressed concerns to us about the pace and volume of work that is required to co-create the qualifications in time for pupils to choose their GCSE options in 2024/25. ColegauCymru expressed concern about how the new qualifications would support A levels, students who cross the border to study<sup>48</sup> and those studying vocational qualifications which are mostly not Wales-specific. Qualifications Wales and the Welsh Government recognise that this work is urgent. Workstreams are underway; initially schools were struggling to release staff but after more communication and a recruitment drive, Qualifications Wales told us it secured enough teachers and lecturers to fully populate all 24 working groups established to support the co-construction of new GCSEs and related qualifications. They told us that there has also been a positive response from schools and colleges for its learners' engagement work in Spring 2021. It will be important to monitor progress of this work so that new qualifications are co-designed with stakeholders.

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47 Jones C. in collaboration with the Future Generations Commissioner for Wales, Fit for the Future Education in Wales, October 2019

48 The number of 16-19 year olds that cross the border to study in schools or colleges in England or Wales is thought to be relatively small in total but can be significant for institutions close to the border.

3.15 Over time the degree to which teacher assessment has featured in qualifications has changed in Wales. In December 2021, Qualifications Wales published research on the involvement of teachers in assessment in 12 other jurisdictions<sup>49</sup> and on teachers and learners' experiences of non-examined assessment<sup>50</sup> to inform the design of new qualifications. Teachers and learners will require support to move to these qualifications including:

- **Ensuring reliability and validity of assessment led by teachers** – in 2020 there was concern about the influence of bias on teacher assessment<sup>51</sup>. In 2021, Qualifications Wales and the WJEC introduced a quality assurance process and appeals system to ensure learners received results that fairly reflected their achievements in qualifications designed to be assessed primarily through external examinations. There will need to be a national programme of support and professional learning and frameworks to ensure a common approach and maintain public confidence in outcomes.
- **Understanding the workload implications for teachers** – delivering centre assessed grades during the pandemic resulted in additional work for teachers and diverted them from other work. As circumstances become more normalised, the workload implications of any changes in assessment will need to be considered, including evidence from other jurisdictions.
- **Understanding the impact of assessment on learners** – generally, learners feel positively about non-examined assessment methods, but some find the volume of work difficult to manage. There are contrasting views about the accessibility of non-examined assessment for learners, particularly those with lower ability levels.

### **Greater engagement with parents, carers and learners is needed to ensure successful implementation of the curriculum**

3.16 The new curriculum framework requires schools to consult and inform parents and carers about the curricula. Schools are developing ways of doing this such as parents committees and events, building on case studies and good practice. Schools' engagement with parents and carers has generally benefitted from new ways of working during the COVID-19 pandemic.

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49 Alpha Plus, International educational assessment systems and their involvement of teachers in the assessment cycles, Qualifications Wales, August 2021

50 Qualifications Wales, Teacher and learner perceptions and experiences of non-examination assessment (NEA) in approved GCSEs in Wales, December 2021

51 OFQUAL, Equality impact assessment: literature review, April 2020

- 3.17 Engagement will be particularly important in relation to aspects of the new curriculum that have proved controversial, such as the changes to religion, values and ethics, relationships and sexuality education and Welsh language. For example, in November 2020 the Senedd Children, Young People and Education Committee urged the Welsh Government to conduct a ‘myth busting’ exercise to inform parents about the relationships and sexuality education that will form part of future learning. The Welsh Government accepted this recommendation, and the Senedd approved the Relationships and Sexuality Education Code in December 2021. The Welsh Government has a communications campaign on relationships and sexuality education underway and has updated information on its digital platform, Hwb.
- 3.18 Schools must engage with parents about their curricula and enable parents and learners to participate in schools’ evaluation and improvement. It is not clear if the Welsh Government plans to measure the level of engagement with parents, as has been the approach in Scotland<sup>52</sup>.

**It is not clear yet what information will be available to support a new approach to self-evaluation, improvement, accountability and transparency**

- 3.19 The success of education systems tends to be judged, at least in part, by exam and test results. Over time, successive Welsh Governments have varied their approach to these high-stakes measures<sup>53</sup> with self-evaluation featuring increasingly as a feature of the Welsh Government’s approach to school improvement and accountability. Many stakeholders see this as a strength, breaking the link between assessment and accountability measures. However, an OECD review in 2018<sup>54</sup> found that there was no common understanding of what a good self-evaluation looked like.

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52 Scottish Government, Learning together: national action plan for parental involvement, engagement, family learning and learning at home 2018-21, December 2018

53 In 2012, the Welsh Government introduced changes relating to collecting, publishing and sharing information about schools and pupils to ensure robust self-evaluation and effective challenge and help drive up standards. A national banding system for schools (the National School Categorisation System) was introduced to identify schools in need of improvement. Numeracy and literacy tests were introduced for pupils between 7 and 14 years of age in 2013.

54 OECD, Developing schools as learning organisations in Wales, October 2018

- 3.20 Work on accountability and improvement has been subject to delay. In February 2019, the Welsh Government published initial draft guidance on evaluation and improvement for the new curriculum<sup>55</sup>. This proposed a system based on four principles: fair, coherent, proportionate and transparent. This was superseded by a more detailed draft in January 2021<sup>56</sup>. In October 2020, the Welsh Government said that guidance and support for schools' self-evaluation would be available ahead of the 2021/22 academic year<sup>57</sup>. The Welsh Government published the National Resource: Self-evaluation and Improvement for schools in October 2021 with guidance and practical examples to support a self-improving school system on Hwb, its digital platform for learning and teaching. Pilots began in November 2021 and the Welsh Government currently anticipates it will be completed by the end of the academic year with the majority of resources published by April 2022.
- 3.21 Welsh Government regulations prescribe the information schools must include in their annual report to governors and school prospectus<sup>58</sup>. Since 2018, schools have not had to include comparative information from national reading and numeracy assessment. In 2020, the requirement to report exam results and authorised and unauthorised absence was removed because of the uneven impact of the pandemic. This continued in 2021/22<sup>59</sup>. As yet, it is unclear what information will be reported publicly or to those charged with scrutiny and accountability<sup>60</sup>. There is an opportunity to include data relevant to all curriculum areas – for example health and wellbeing – and not just examination or test results.
- 3.22 The Welsh Government has commissioned research on the information needed for self-evaluation, improvement, accountability and transparency across all tiers of schools to report in September 2022, a year later than suggested in its October 2020 updated action plan. It will be important to include robust data that allows parents and governors to have a full picture of the schools' performance and enable scrutiny by governors and local authorities. Otherwise, there is a risk that external exercises such as PISA tests and exam results remain high-stakes tests for the education system and the Welsh Government.

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55 Welsh Government, Draft evaluation and improvement (accountability) arrangements for Wales, February 2019

56 Welsh Government, School improvement guidance: framework for evaluation, improvement and accountability: Draft guidance, January 2021

57 Estyn, Welsh Government and the Regional Education Consortia, The National Evaluation and Improvement Resource (NEIR) update and guidance v1.3, October 2020

58 The School Governors' Annual Reports (Wales) Regulations 2011

59 The relaxation of school reporting arrangements (Wales) (coronavirus) regulations 2022, February 2022

60 Governing bodies are the accountable bodies for their schools. Where schools are causing concern, local authorities can intervene, advised and supported by regional consortia. Democratic accountability in local authorities (Councils and Scrutiny Committees) and in regional consortia (Joint Committees and Company Board) supports schools through monitoring, challenging and supporting improvement.

- 3.23 The Curriculum and Assessment (Wales) Act 2021 requires ministers to keep the 27 'What Matters' Codes and the Progression Code under review. Headteachers and governors are also required to keep schools' curricula under review. However, the Act does not state how or how often it should be undertaken. There are a number of routes for review including the national networks. Welsh Government Ministers have offered to report annually to the Senedd on progress, providing an opportunity for scrutiny.
- 3.24 Research has shown that countries with respected education systems tend to undergo curriculum reform on a planned cyclical basis (see **footnote 7**). In the review of the Curriculum for Excellence commissioned by the Scottish Government in 2020, the OECD commented that the Scottish Government did not plan for a formal review of the Curriculum for Excellence framework, 'although such a review cycle is common practice in curriculum policy in other education systems' (see **footnote 46**). Since devolution in 1999, the Welsh Government has commissioned several curriculum reviews (in 2008, 2012 and 2014) but there has been no mechanism for cyclical review.



# Appendices

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- 1 Audit approach and methods
- 2 Timeline of key events relating to curriculum reform, 2008-2027

# 1 Audit approach and methods

## Audit approach

We focused on the Welsh Government's management of the curriculum reform implementation programme. Our aim was to support the implementation process and support scrutiny. Therefore, we provided a detailed response to the Senedd consultation on the Curriculum and Assessment (Wales) Bill in September 2020. We have met with Welsh Government officials regularly during this audit.

At the outset of our work in early 2021, we were focused on whether the implementation was on track, in particular in the light of early conversations with colleagues in Estyn and elsewhere of the impact of the COVID-19 pandemic on secondary schools' ability to develop their curricula and professional learning ahead of the planned implementation of the new curriculum in September 2022.

Our aim was to provide assurance that implementation was on track in the context of revised plans announced in July 2021. Our audit work focused on whether:

- the Welsh Government had a clear purpose for curriculum reform;
- the implementation of curriculum reform was progressing as planned;
- there were significant risks/barriers to successful implementation of the new curriculum; and
- the Welsh Government was effectively managing the main risks.

In recent years, there have been several reviews by the OECD and others as well as research associated with curriculum reform. Estyn has conducted several thematic reviews as well as engagement work in 2020 and 2021. We have referenced its work rather than duplicate it. The Welsh Government asked Estyn to review consortia and local authorities' support for schools on the new curriculum in 2021. We were in regular communication with Estyn about its work.

## Audit methods

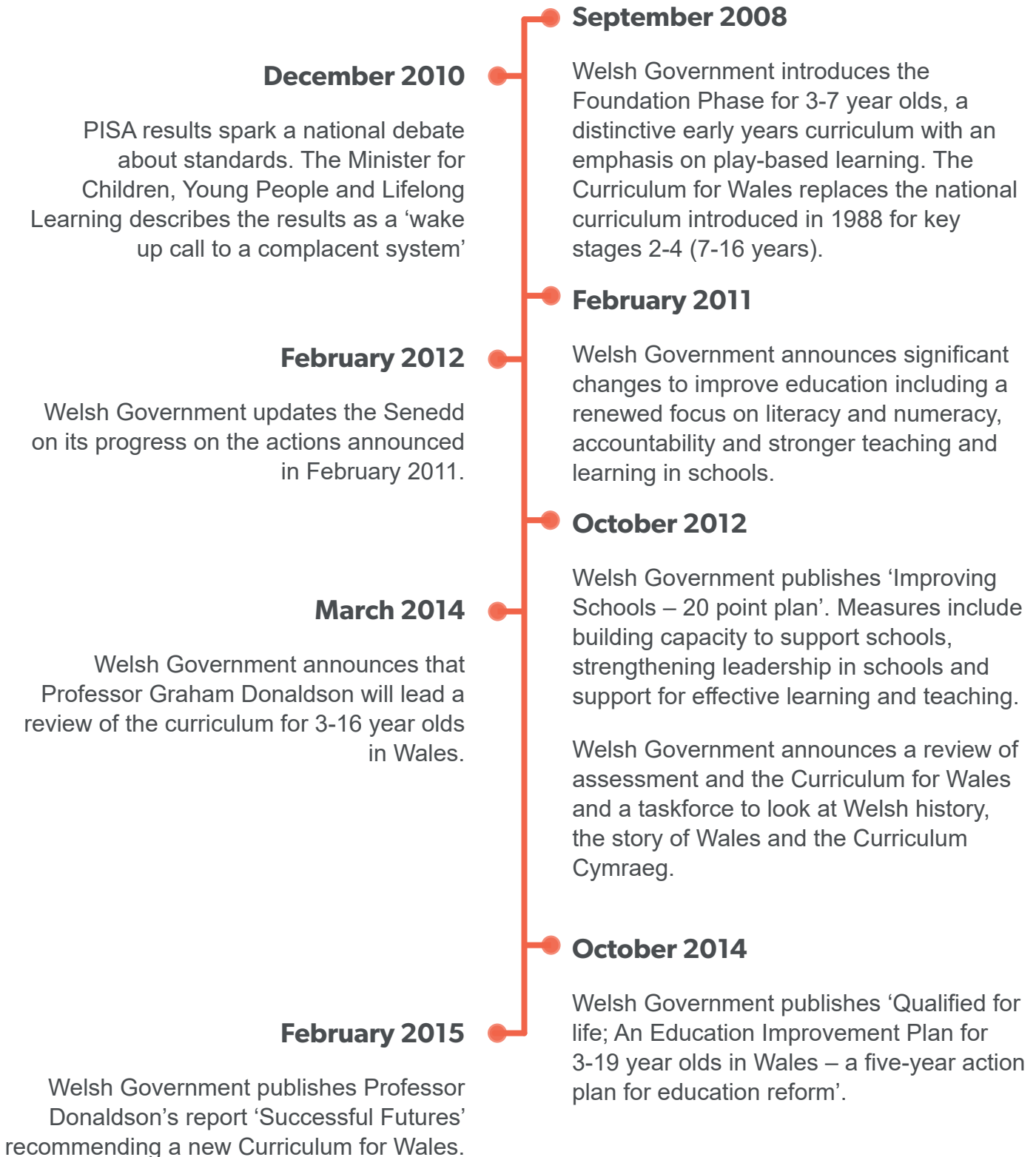
- **Document review:** we reviewed a large amount of documentation and research regarding curriculum reform, in a deliberate effort to not duplicate evidence gathered by others. We touched on some of the challenges around curriculum reform in our A Picture of Schools report in October 2021.
- **Semi-structured interviews:** we interviewed Welsh Government officials and staff from other key stakeholder organisations such as Estyn, Welsh Local Government Association, the Office of the Future Generations Commissioner, Qualifications Wales and the Office of the Children's Commissioner.
- **Data analysis:** we reviewed financial data on how much money had been spent on curriculum reform.
- **Call for evidence:** we invited interested parties to provide their views on progress with curriculum reform. We targeted organisations and individuals who had previously responded to the Senedd consultation on the 2020 Curriculum and Education (Wales) Bill which closed in September 2020.

We received feedback from 9 education organisations, including ColegauCymru who also asked to meet with us along with representatives from the further education sector.

We also received responses from 5 headteachers, 12 teachers, 7 parents and 4 members of the public. While these could not be considered representative, we considered them alongside other survey evidence (see **footnotes 26 and 28**) and the Education Workforce Survey 2021.

- **Workshop:** we held a workshop with Welsh Government officials to explore the background to, and status of, the curriculum reform programme.

## 2 Timeline of key events relating to curriculum reform, 2008-2027









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