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 the draft *Curriculum for Wales 2022*. 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, and is intended as a strategic rather than an operational response. Although there is no specific question on the funding, this is a new and important initiative, and the expectation on the part of local government is that all aspects of the curriculum will be fully and appropriately funded at all levels.

Section A - General questions

A1. To what extent do you agree that the draft *Curriculum for Wales 2022* guidance will help children and young people to become:

- ambitious, capable learners
- healthy, confident individuals
- ethical, informed citizens
- enterprising, creative contributors?

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Comments:

The WLGA and ADEW strongly support the purpose led curriculum that is to be designed at school level. It is agreed that the guidance makes this clear and should help children and young people to progress to the point where they are secure in meeting the four purposes.

Schools will hopefully underpin their development of a locally devised curriculum with a vision and ethos that clearly reflect the needs of their community.
A2. Looking at the what matters statements, to what extent do you agree that these sum up the priorities for children and young people's learning?

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Comments:

The WLGA and ADEW agree that the "what matters’ statements” give schools enough flexibility to design a curriculum that meets their learners’ needs: The points about community and ethos are important in this as stated above.

A3. Do you think the draft Curriculum for Wales 2022 guidance could be improved?

Yes ✔️ No

If yes, how do you think it could be improved?

Comments:

Effective self-evaluation is a crucial factor in enabling schools to be confident and to ensure that the ambition inherent in Our National Mission is met at school level.

The WLGA and ADEW suggest that clear references to this need to be made in the guidance when published and would be happy to make appropriate contributions in support of working on changes to enable its inclusion.

The WLGA and ADEW suggest also that key information in the ‘Successful Futures’ document could be included here:
- The 12 pedagogical principles are extremely important, and their inclusion could significantly strengthen the guidance. We feel that the twelve principles are broad enough to include without making the Guidance too prescriptive;
- Also, the key characteristics of the four core purposes and the principles of curriculum design warrant inclusion; and,
- In order to have a clear and coherent understanding of the new curriculum, the AOLE documents must be read in conjunction with the guidance and the assessment arrangements document. This should be made clearer.

A4. To what extent do the assessment proposals support settings and schools to identify a learner’s strengths, achievements and areas for improvement so they can support a learner’s progression by identifying next steps?
The WLGA and ADEW agree with the general principles outlined in the proposals namely that current assessment arrangements are confusing and are no longer fit for purpose.

It is broadly accepted that teachers will need to provide the kind of high-quality feedback to learners that comes from good, formative assessment. Therefore, the proposals could more clearly indicate what activities such as cluster moderation, baseline assessment and e-portfolios will look like; in other words, some of the proposals would benefit from greater detail.

A5. In relation to reporting to parents and carers, please tell us your views on:

- the role of the learner in contributing to the reporting process
- the role of the parent/carer in the reporting process
- the information you would want to include.

The WLGA and ADEW endorse the principle that all schools should be encouraged to share the principles and purposes of the curriculum for Wales with parents, carers and the community.

Pupils and parents/carers should have an opportunity to respond to their annual reports. Information to parents/carers should include the progress the pupil has made during the year in relation to skills - literacy, numeracy and digital competence - identifying strengths and areas for development.

Annual reports to parents should also:-
- Include an evaluation of the pupil’s attitude to learning; and,
- Identify pupils’ strengths and areas for development in relation to the key characteristics of the four core purposes.

WLGA and ADEW submit that it is important for parents and carer’s to be involved in contributing their views on what are seen as the learner’s strengths, and also what the learner needs to do better.
Section B - Detailed questions

B1. How helpful would you find the draft Curriculum for Wales 2022 guidance in developing a curriculum for your learners?

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Comments:

The WLGA and ADEW believe that the guidance is clear, concise and readable, with an emphasis strongly on the purposes and the need for schools to design their own curriculum.

The focus on the development and progress of the child through their time in school is very much welcomed as is the fact that the guidance is not overly prescriptive and provides schools with the flexibility to design a relevant and appropriate curriculum for their school within the national framework.

B2. How well do you think the draft Curriculum for Wales 2022 guidance allows for all children and young people to gain a broad range of learning experiences?

You may want to consider learning across the different disciplines and subjects which form part of an area of learning and experience.

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Comments:

The WLGA and ADEW agree that this is very exciting and ambitious.

ADEW colleagues report that a range of different opinions are encountered when visiting schools but most schools seem generally supportive of the need for a broader range of learning experiences.

Despite anxieties in some schools due to the scale of the change, it is noted that the guidance is explicit and clear. The framework allows schools the space for different disciplines and subjects to collaborate in order to develop their learning through a broad range of experiences in order to meet the needs of the school community and develop the four purposes in the learners.
B3. How well do you think draft Curriculum for Wales 2022 guidance allows for all children and young people to specialise from age 14 in a particular discipline or subject?

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Comments:

It is noted that the draft guidance allows children and young people to specialise from the age of 14 in a chosen discipline.

The WLGA and ADEW believe though, that forthcoming consultations planned by Qualifications Wales need to address clearly the links necessary between qualifications frameworks and the new curriculum to remove any current uncertainties.

The intended broad range of learning and experiences should better prepare pupils to be able to specialise more effectively from the the age of 14 in particular disciplines and subjects. Their skills, knowledge and understanding can be broader and deeper as a result of a rich curriculum thereby providing learners with sound foundations and avoiding the narrow curriculum many children in Wales may have experienced.

It would be helpful to clarify these links equally across all specialisms, as it is clearer in some of the AoLEs than others: For example, science and technology and mathematics appears clearer in this context than, say, in the expressive arts AoLEs.

Such changes would strengthen the guidance.

B4. The draft Curriculum for Wales 2022 guidance is intended to support practitioners and teachers to design a curriculum specific to children and young people. To what extent will practitioners and teachers have the flexibility and support to do this?
This is a real strength of the new curriculum in the view of the WLGA and ADEW because:

- It provides space to design a curriculum based on a school’s context and the needs of its pupils.
- It trusts teachers to develop a curriculum that it is broad, balanced and exciting, with rich experiences built into the principles of curriculum design;
- The four purposes are crucial in ensuring that what is designed meets the ambition set out in the curriculum.

On balance, it is thought that the guidance could support more effectively by ensuring that the glossary is exhaustive (e.g. In ‘what matters’ statement 1 in the Mathematics and numeracy document the word ‘nominal’ is used) and that the guidance fully supports teachers to develop effective pedagogy.

The WLGA and ADEW understand however the desire to avoid prescription, and would again be willing to offer support in areas where the draft guidance might be strengthened by changes.

B5. How well do you think the draft Curriculum for Wales 2022 guidance supports learners to develop skills in the cross-curricular responsibilities (literacy, numeracy and digital competence) and other cross-cutting themes (e.g. Welsh dimension and international perspective, wider skills, careers and work-related experiences, relationships and sexuality education)?
B6. How could the cross-curricular frameworks (National Literacy and Numeracy Framework and the Digital Competence Framework) be refined to support the development of literacy, numeracy and digital competence across the new curriculum?

Comments:

Building on the positive comments made in B5 above, the WLGA and ADEW see great merit in working to secure alignment of the cross-curricular frameworks to both the ‘what matters’ statements and the progression steps.

ADEW colleagues have given examples of areas where greater consistency in this alignment may be achieved in individual local authority responses and the WLGA would be happy to share those examples.

B7. How well do you think the guidance for each area of learning and experience will support children during the Foundation Phase years?

Comments:
The WLGA and ADEW are aware of the commitment given to the value of the Foundation Phase in ‘Successful Futures’ that has been built on through the new curriculum model.

It is hoped that the updated Foundation Phase profile will be the means of demonstrating a clear starting point for pre-school pupils, including those with additional learning needs, to enable all schools accurately to evaluate pupil’s progress from entry.

**B8. How well do you think the draft Curriculum for Wales 2022 guidance supports and enables learners to progress at an appropriate pace for their development within the area of learning and experience from ages 3 to 16?**

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**Comments:**

The WLGA and ADEW see that the guidance supports clear progression for pupils aged 5-16: As drafted, it enables learners to progress at an appropriate pace for their development 'starting point' (see response to B7 above).

Attention is needed in relation to more clearly supporting the progress of all pupils aged 3-5 or pupils with additional learning needs, particularly pupils with profound additional learning needs.

As has been suggested, the updated Foundation Phase Profile is most likely the vehicle to secure this change.

**B9. How well do you think the draft Curriculum for Wales 2022 guidance will provide a basis to help young people progress beyond the age of 16?**

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**Comments:**

The WLGA and ADEW believe that the new curriculum is clear in setting out the aim to develop learners who achieve the four purposes and will be ready to be lifelong learners.

The aim of the new curriculum is suitably ambitious and clearly sets out the mission to help young people progress beyond the age of 16, where they will be ready to play a full and active role in society and also be prepared for the workplace.
B10. Formative assessment should be given primacy in the new curriculum. How well do the assessment proposals promote this principle?

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Comments:

The primacy of formative assessment is extremely clear in the guidance and the WLGA and ADEW support this fully.

As mentioned in B3 above, there is probably some interdependence at secondary level between good formative assessment between the new curriculum and the end of key stage 4 qualifications. So, the links made in this context will be important.

B11. The assessment proposals propose a broader approach to moderation - supporting professional dialogue regarding the nature of progression, the selection of appropriate learning and assessment activities, as well as ensuring a shared understanding of what achievement looks like in the context of the achievement outcomes.

How would you envisage your setting /school putting this approach into practice? What further support do you think would be needed?

Comments:

There will clearly be a strong role for local authorities and school improvement services in the oversight of such activities.

The WLGA and Estyn are committed with Welsh Government to shifting the culture and moving the whole system forward and ADEW are part of this process.

So, whilst schools’ external partners and support services can add a quality assurance and the ability to share best practice, the proposals do aim to do more than simply strengthen the accuracy of assessment.

ADEW colleagues are clear that the need for greater dialogue between practitioners is a key element in schools using the various processes more beneficially than at present. For example, moderation can be a key aspect of professional development by enabling teachers to discuss the nature of progression and child development. Also, a shared understanding of the most effective methods of appropriate learning and assessment activities as well as informed conversations around achievement and what it looks like.
B12. What practical issues for settings and schools do we need to be mindful of if the assessment proposals are to be made a reality?

Comment:

The WLGA and ADEW do not underestimate the challenge of cultural change across a system comprising many players. We believe that it will be important to so whilst the guidance is clear, colleagues on the ground will need to work intensively with many schools to shift the emphasis from summative to formative assessment: The benefits of allowing teachers time to have professional dialogue is crucial but has time and, hence, potential resource implications.

B13. What implications do you see from the draft Curriculum for Wales 2022 guidance for you and your colleagues’ professional development needs in respect of the:

• impact on pedagogical practice
• implications of planning for a purpose-driven curriculum
• professional learning requirements linked to pedagogy
• developing in-school and cross-school collaboration
• specific areas of professional learning aligned to the areas of learning and experience
• opportunities for professional enquiry approaches support delivery of the new curriculum?

Comments:

It is clear to the WLGA and ADEW that professional development is a key issue in getting to the point where the system can be comfortable in and confident of its understanding of these substantial changes.

In the same way as the new curriculum is seen, not as a series of unrelated actions, then the list of key areas in the question above should also be viewed as a coherent package rather than individual parts. This needs to be made absolutely clear to avoid anyone falling into the trap of dealing separately with key points that are inter-related.

Schools in particular have to understand this principle, so that They must deal with these issues coherently and not simply attempt to treat the above as a “tick-list” – that points to those schools which self-evaluate well understanding better the need for a strategic and coherent approach, but where self-evaluation is less well developed, problems can arise.

So, the system must understand and work to overcome these issues and guidance may well need to reflect this.

B14. What are the professional learning challenges and opportunities to enact the principles in the assessment proposals?
The WLGA and ADEW believe that all schools will need to evaluate the effectiveness of their formative learning processes so that all their assessment for learning processes are having the greatest impact. (See WG document Summer 2010 - ‘How to develop thinking and assessment for learning in the classroom’).

It will be understood that many teachers in the system who have experienced a significant emphasis on summative assessment for their whole careers are now going to have to analyse pupils’ skills in a more nuanced manner. This is likely to be a challenge. The WLGA and ADEW believe that it is the right thing to do and most teachers will embrace the change but patience and support will be required.

Section C - Specific: Areas of learning and experience

C1. If you would like to provide specific feedback relating to one or more specific areas of learning and experience, please make a selection and add your comments below.

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<th>Expressive Arts</th>
<th>Language, Literacy and Communication</th>
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<td>Health and Well-being</td>
<td>Mathematics and Numeracy</td>
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<td>Humanities</td>
<td>Science and Technology</td>
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Comments (if you choose more than one area of learning and experience please label each comment):

The WLGA notes that a number of local authority responses make many detailed and technical comments on some or all of the specific areas of learning and experience.

These are wide ranging and too numerous to summarise here, and as already been stated, this joint response inevitably presents a strategic rather than operational prespective and does not go into detailed matters.

The WLGA will happily share any of these if required by the Welsh Government.

C2. How well do the progression steps within the Mathematics and Numeracy Area of Learning and Experience articulate the proficiencies illustrated in the principles of progression?

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Comments:
C3. How well do the learning sections within the Languages, Literacy and Communication Area of Learning and Experience provide for learners to develop translanguaging skills?

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Comments:

C4. How well does the guidance within the Languages Literacy and Communication Area of Learning and Experience provide for the development of language acquisition and learning?

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Comments:

C5. How well does the Health and Well-being Area of Learning and Experience guidance support a whole-school approach to supporting health and well-being?

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Comments:

Is there anything else you would like to add or feedback on?

The WLGA and ADEW support fully the new curriculum for Wales. Both bodies are committed to working with schools and partners to bring about the changes set out in Our National Mission, and are working with Welsh Government, Estyn and other partners on all aspects of change and implementation.

WLGA continues to host Welsh Government initiatives on, for example, healthy schools, and will be looking closely at the cross-curricular opportunities that the new curriculum has at its heart in this context.
Finally, the funding all aspects of the new arrangements is crucial, and local government would expect there to be full funding as outlined in the introduction to this response.

For further information please contact:

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