

**Qualifications Wales**

**Qualified for the future: The proposed purpose, content and  
assessment for new GCSEs**

**14 December 2022**

1. The NASUWT welcomes the opportunity to comment on the Qualifications Wales (QW) consultation, *Qualified for the future: The proposed purpose, content and assessment for new GCSEs*.
2. The Union also welcomes the allowance to respond to the proposals in a format that best allows the NASUWT to convey its views, rather than be constrained to the form formally offered by QW.
3. The NASUWT – The Teachers' Union – represents teachers and headteachers in Wales and across the United Kingdom.

**GENERAL COMMENTS**

4. The NASUWT notes that this consultation stems from the introduction of the new Curriculum for Wales and the recent establishment of GCSE subjects following the *Qualified for the future: The right choice for Wales* consultation in early 2021.
5. The NASUWT continues to campaign for the development of a curriculum and qualifications system in Wales that supports teachers in meeting the needs of learners effectively.

6. The NASUWT believes that all children and young people have an entitlement to access a broad, balanced, relevant and engaging curriculum.
7. In the view of the NASUWT, public education is a cornerstone of democratic society; it is an essential element in the framework of social rights of children, young people and adults. Public education, in our view, must also be defined by its universality. Public education should encourage personal fulfilment, social responsibility, knowledge, cultural acquisition and skills for life. It should deliver for society's needs for social and economic development, political participation, environmental responsibility and international solidarity. Schools should not simply be 'exam factories', as this is detrimental to the mental and physical wellbeing of pupils. The qualifications framework must recognise and address this.
8. The NASUWT is of the view that a fundamental purpose of GCSEs is to evidence learners' achievements against demanding and fulfilling subject content. The Union is also clear that the qualifications framework should operate in a way that supports work to maintain the world-class status of the education system in Wales.
9. The Union campaigns across the nations for the introduction of curriculum frameworks and qualification systems that do not result in excessive and unnecessary workload burdens for teachers and school leaders or distract them from their core responsibilities for teaching and leading teaching and learning.
10. The Union also maintains that there is a need to ensure that the general qualifications framework provides an effective basis for further learning through, for example, study towards A-levels or qualifications accessed through participation in apprenticeship programmes.
11. The NASUWT has noted in previous consultations that since 2015 general qualifications in Wales have been subject to significant reform.

These reforms have placed major pressures on the teaching workforce. The Union continues to work to protect teachers and school leaders from excessive and unnecessary qualifications-related workload.

12. This will only increase the stress and workload of an already overburdened workforce. The NASUWT has been warning for some time that there is a recruitment and retention crisis in the teaching profession and the further reform programme of the Welsh Government, coupled with qualification changes, has the potential to drive more teachers, particularly in the secondary sector, out of the profession. This is also being aggravated by staff restructuring in secondary schools, removing subject-specific Teaching and Learning Responsibility (TLR) Allowances and replacing them with posts focused on the Areas of Learning and Experience.
13. The Union is very concerned that this may lead to a further reduction in properly qualified and experienced teachers in secondary subjects, many of which are already suffering from shortages.
14. The NASUWT is also concerned that further changes to the GCSE framework, coupled with the changes carried out in England, may undermine the commonality of qualifications frameworks across the UK, given that the GCSE remains the principal 16-plus qualification in Wales, England and Northern Ireland.
15. Notwithstanding these concerns, the Union is clear that if the qualifications system is to make an effective contribution to ensuring that all pupils can reach their full potential, qualifications should be designed in a way that continues to promote a culture of high expectations across the education system and provides realistic but challenging objectives for learners.

## **SPECIFIC COMMENTS**

16. The NASUWT has consulted with their secondary sector members during this period. Nearly all respondents were positive about the content of the qualifications.
17. The most common comments received concern the increase in the use of various Non-exam Assessments (NEAs). The NASUWT acknowledges and welcomes the fact that QW has considered some of these following points in the research paper they produced.<sup>1</sup>
18. The nature of examinations as a solitary, be-all-and-end-all mechanism to quantify a learner's ability has been well debated – especially since our emergence from the COVID pandemic. The use of examinations to measure, test and qualify learners has its merits. Having all learners in Wales sit the same examination in a qualification – regardless of location, school and any other potential influences and factors – ensures that the process is standardised across the country, from the assessment/marking being done by one examining authority (EA) to the moderation of marks by the EA, and is arguably entirely free from any potential malpractice opportunities, errors or administrative mistakes.
19. QW has explored the different assessment ways as part of its response to the *Designing Your Curriculum* guidance of the Welsh Government.<sup>2</sup> QW proposes that many of the prospective qualifications will have an NEA aspect to them that vary in their percentage of the qualification as a whole, in how the NEAs are moderated, and in how the NEAs are assessed.
20. There is little doubt that the introduction of NEAs offers a dimension to GCSE qualifications that increases the opportunities for learners to show their abilities more than a fixed-period examination event alone can

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<sup>1</sup> [https://s3-eu-west-1.amazonaws.com/ehq-production-europe/bffeb795a1629d6d71fc23268d61b298d704bf5a/original/1664462084/c7fc0f743dca090ea35e59f867cf03a6\\_Comparison\\_of\\_Assessment\\_Methods.pdf?1664462084](https://s3-eu-west-1.amazonaws.com/ehq-production-europe/bffeb795a1629d6d71fc23268d61b298d704bf5a/original/1664462084/c7fc0f743dca090ea35e59f867cf03a6_Comparison_of_Assessment_Methods.pdf?1664462084)

<sup>2</sup> <https://hwb.gov.wales/curriculum-for-wales/designing-your-curriculum/developing-a-vision-for-curriculum-design/#assessment>

achieve. This is presumably why the emphasis of the proposals shifts toward NEAs.

21. However, QW must remain mindful of the fact that NEAs themselves bring with them a set of issues and potential pitfalls which have been highlighted by our member comments. To be clear, the NASUWT does not oppose NEAs, but does have major concerns over the fact that such a significant proportion of an external qualification's assessment and moderation will rest exclusively on the shoulders of teachers.

### **Workload and accountability pressures.**

22. The NEA will be assessed/marked by the classroom teacher. There may be some cases where the NEA component will also be moderated internally by the subject specialists – especially when there may be a need to present a sample to the examining authority, or if the NEA mark is made up from discreet components (for example, a science GCSE NEA mark made up of biology, chemistry and physics components).
23. This scenario has existed in the past with certain qualifications (e.g. in science and humanities qualifications) and, without a doubt, the increase in workload is significant. Any NEA marking or moderation clearly has to be undertaken accurately and according to the examining authority's guidance. This high-stakes process means it has to be given due regard and attention, and so time-wise it is a significant event in the assessment calendar of that school. All our member comments stated that no additional timetabled time is ever assigned to such a high-stakes activity and it is usually addressed piecemeal and as best as the practitioner can. Members report to the NASUWT that lunchtimes are frequently used for NEA activities. This is unpaid work undertaken by teachers. QW cannot direct schools to assign directed time to these tasks, but must be mindful that such an important part of the qualification is mostly being dealt with on a make-do-and-mend basis.

24. NEAs have also been a cause for concern regarding malpractice. Such a high-stakes process in the GCSE cycle can find teachers being put under pressure by schools to ensure good NEA outcomes. This pressure should not be there in the first place, but this is the reality of high-stakes accountability in schools in Wales. Whilst the majority of practitioners will channel that pressure into the preparations and teaching leading up to the NEA, some teachers may feel so pressured that they commit acts of malpractice in order to meet the high-stakes demands of the school. NASUWT casework experience shows that this situation is common and widespread. The NASUWT does not seek to excuse this behaviour but questions how teachers can be so desperate as to put themselves into situations that can end careers and damage reputations.
25. Whilst it is not the responsibility of QW to ensure that practitioners abide by the Teaching Standards, it must be cognisant of the fact that NEAs are infinitely more susceptible to malpractice acts than examinations are. QW has a duty to ensure any assessment process they adopt is robust and can maintain its integrity. However, the NASUWT would oppose increasing rigour in moderation for the reasons of workload stated above. The NASUWT would argue that NEAs cannot compete with examinations in respect to integrity and so QW must ensure that any proposed NEAs involve as little of the practitioner as possible.

### **Examining Authority Standardisation**

26. Another aspect that NEAs may affect the processes of is the EA itself. With examinations, the EA will have a process of standardising marks that will be dependent on the marks attained by every learner in that examination. This is because the EA has the difficult task of having to moderate across different examinations, as well as within that examination itself, to ensure parity. The EA will have a specialist formula to calculate a standardised mark from a learner's marks that takes into account the marks of all other learners in the examination that will allow standardisation across qualifications.

27. With NEAs this is not possible. The NEA mark that arrives from the schools cannot be subject to the same standardisation as an examination, other than perhaps scrutinising a sample of NEAs from a school so as to ensure the sample broadly matches the expected marking. EAs have to accept this as a peril of the process. If the percentage of NEAs in a subject is increased (to perhaps 50% or more) then the robust moderation and standardisation techniques applied by the EA will only happen with the smaller, examination part of the qualification.
28. Nevertheless, QW has a duty to ensure that any assessment process it adopts is robust and can maintain its integrity at all points in the process.

### **Effect on Learners and Schools**

29. Learners who move schools during their GCSE course can be detrimentally affected by having NEAs as a significant part of their qualification. A learner may leave a school before having undertaken an NEA and go to a new school to find that the NEAs have long since been completed. Whilst it is clearly incumbent on the school to provide an opportunity for all learners to have access to the qualification, it is a workload issue for the teacher as well as the learner.
30. It is also fair to point out that shifting more of the assessment onto the shoulders of schools should see a decrease in the amount that the EA may charge for qualifications from the school. Schools pay a hefty sum to EAs at the moment, and the irony will not be lost on schools seeing that money depart but more assessment responsibility arrive in return. It is also the case that teachers' work in the NEA is subject to no extra remuneration. Members report to the NASUWT that they sometimes resent doing the work of the EA without being paid by the EA.

### **Guided Learning Hours**

31. There is a proposal to shift Cymraeg, English and Mathematics GCSEs to the equivalent of 1.5 GCSEs. Conversely, there are proposals to remove separate science GCSEs to leave just the Combined Science GCSE.
32. The former proposal must take into consideration the staffing complements in small secondary schools. Increasing GCSEs from 120-140 GLH to 180-200 GLH<sup>3</sup> will clearly increase the learning hours required within the timetable to deliver that GCSE. Small secondary schools have fewer teachers than medium or large secondary schools, and the teachers will be teaching more than one subject on their timetables. There may well be no capacity in the timetable to give teachers any extra learning hours that might be needed. Either the teacher has to cram the course into fewer learning hours than their counterparts in larger schools (not forgetting to have to timetable the NEA), or they may feel compelled to provide lessons during lunchtimes or after directed time. Clearly, any GCSE introduced should allow equitable access to all schools regardless of size. Whist QW has no responsibility on timetabling; it must be weary of such a consequence and its knock-on effect on workload and wellbeing.
33. The latter proposal will affect the larger schools that do have the staffing capacity to offer separate sciences to learners who wish to specialise. The net effect for learners is a narrowing of the curriculum – which is the total opposite of the ethos of the Curriculum for Wales. The net effect for practitioners may be that they find their timetable significantly redundant, which could bring on the fear that their post is superfluous if redundancy procedures ever visited that school.

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34. The solution to upholding the robustness and integrity of NEAs is to have the EA mark, moderate and standardise them. [not clear] ? The school

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<sup>3</sup> <https://haveyoursay.qualifications.wales/hub-page/gcsereformsexplained>



would be responsible for undertaking the work and then posting it off to the EA. This would circumvent any workload issues, any potential malpractice issues and any standardisation complexities.

35. Also, all NEAs should be timetabled by the EA and occur within a fairly narrow window of time. This will allow the school to properly calendar the process, but also be supportive of any learners who move schools, since all schools will be undertaking the NEA in that window.
36. QW proposes that NEAs can be supplemented by the use of digital technology. The NASUWT can see the merits of using IT to undertake NEAs as it will remove the need for teacher assessment and moderation, and the EA will receive the results instantly. However, QW should not presume that the state of IT infrastructure and equipment in secondary schools in Wales, as well as with families in Wales, is uniform. There is a huge variance in the IT provisions from school to school, from LA to LA and between the large and small schools. Until IT provision is a level playing field and the Welsh Government ensures equality of access to fully functioning and fit-for-purpose IT infrastructure for all schools, QW must be hesitant of relying on such a medium.

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