



David J Rowlands AM  
Petitions Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff CF99 1NA

23 October 2017

Petition P-050-783: Ensuring equality of curriculum for Welsh Medium Schools e.g. GCSE Psychology

Dear Mr Rowlands

Thank you for inviting our views on the issues raised in this petition.

Since our establishment in September 2015, the issue of securing the availability of GCSE, AS and A level qualifications in lower take-up subjects, in both Welsh and English, has been significant and is one to which we have given considerable thought.

To help explain the nature of the challenge and the approach we have taken to address it, we have structured our response as follows:

1. Our powers and duties in respect of the qualifications system
2. Background on the reform of GCSEs and A levels in Wales
3. Our approach to designating GCSEs and A levels in low take-up subjects
4. The actions we have taken in respect of GCSE Psychology

## **1. Our powers and duties in respect of the qualifications system**

The Qualifications Wales Act 2015 established us as the independent regulator of non-degree qualifications in Wales and set out our powers and duties.

The Qualifications Wales Act 2015 gives us two principal aims and sets out eight matters to which we must pay regard as we pursue those aims.

One of our aims is:

- Ensuring that qualifications and the Welsh qualifications system are effective in meeting the reasonable needs of learners in Wales

Of the eight matters to which we must have regard, the three that most relevant to this petition are:

- the desirability of promoting and facilitating the use of the Welsh language
- the range and nature of qualifications available, and of their assessment arrangements
- the reasonable requirements of employers, higher education institutions and the professions regarding education and training (including as to required standards of practical competence).

We regulate awarding bodies recognised by us and the qualifications they offer. The awarding bodies we regulate must meet our conditions of recognition. For qualifications to be eligible for inclusion on publicly funded courses, they must either be approved or designated by us against our approval or designation criteria.

Offering qualifications is a voluntary activity, there is no requirement on awarding bodies to offer any regulated qualifications. Regulation is also voluntary, there is no requirement on awarding bodies to seek recognition by us, unless they want their qualifications to be eligible for public funding. There are no legal requirements placed on awarding bodies to offer qualifications in the medium of Welsh.

Most of the awarding bodies we regulate offer the same qualifications in Wales as they do in England. The number of learners in Wales for a given subject are not always sufficient to make the prospect of developing separate qualifications specifically for Wales commercially attractive or even viable.

We have the power to place conditions of recognition on regulated awarding bodies, but because these bodies operate as commercial organisations it is a decision for them whether to accept those conditions and continue to offer regulated qualifications in Wales, or whether to stop offering their qualifications in Wales.

Placing a condition requiring Welsh medium assessment for a given qualification may result in the awarding body withdrawing it from Wales, taking the choice of the qualification away from all learners.

We have the power to provide grant funding to awarding bodies. In 2016/17, we spent £633,460 to support the cost of Welsh medium assessment and the translation of materials for assessors and teachers.

We have a published 'Regulatory Welsh-medium and Bilingual Qualifications Policy' aimed at awarding bodies, which lays out our approach to increasing the availability of Welsh-medium qualifications.

In our General Qualifications Strategic Plan, we set out our aim for all general qualifications offered in Wales to be available in Welsh and English. This is already the case for those GCSEs and A levels that have been designed for Wales, and for the Welsh Baccalaureate, all of which are offered by WJEC. GCSEs and A levels in other subjects that are taken by relatively low numbers of learners in Wales are offered by a range of awarding bodies. Some – but not all – of these are also offered in both languages. We continue to look at ways to increase the number of qualifications offered bilingually.

## **2. Background to the reform of GCSEs and A levels in Wales**

In 2012, the Welsh Government's Review of Qualifications for 14 to 19-year-olds in Wales recommended reforming GCSEs and A levels.

The new qualifications were introduced in phases over three successive years. The first group of reformed subjects were introduced for first teaching from September 2015, the second from 2016, and the third group of subjects have just started being taught from September this year. These new qualifications have been specifically developed for Wales to meet design principles initially set by Welsh Government and more recently by us. These qualifications are only offered by WJEC and are all available in both Welsh and English. At the same time as the reforms in Wales, new GCSEs and A levels were developed separately in these subjects for England, based on requirements set by Ofqual, the qualifications regulator in England.

There are some GCSE and A level subjects for which the number of potential candidates in Wales is too low to make it viable for any awarding body to develop qualifications for award only in Wales. In some of these subjects, new GCSEs and A levels have been reformed in England, where the potential number of candidates is large enough to make the qualifications viable.

We enclose a list of these subjects in the appendix, noting which awarding body offers them as reformed GCSEs, AS and A levels in England. This is relevant because not all subjects are offered by all the awarding bodies. Some subjects are only offered by a single awarding body, usually because the potential number of learners taking them is only just sufficient to meet a viability threshold. New qualifications in these subjects were introduced for first teaching from September 2017, except for Latin and Dance, which were introduced in 2016.

Qualifications designed to meet requirements set by Ofqual differ in several important ways to those GCSEs and A levels for which we have set Approval Criteria. For example, new GCSEs in England are graded on a scale of 9 to 1, not A\* to G; and new AS and A levels in England are decoupled, so that the AS results do not contribute to the overall grade awarded at A level.

### **3. Our approach to designating GCSEs and A levels in low take-up subjects**

In autumn 2015, when we were established, we started to consider how to secure the continued availability in Wales of reformed qualifications in low take-up subjects that would not be developed specifically for Wales. In January 2016, we decided that where these subjects were available in England, we would allow the awarding bodies offering them to apply to have them 'designated' in Wales as eligible for use on publicly funded learning programmes.

We then set about developing specific criteria for designating GCSEs and A levels. As part of this process we engaged with awarding bodies who offer these qualifications to discuss their policy and capability to offer Welsh medium assessments. Two awarding bodies, AQA and OCR, confirmed they would not offer any Welsh medium assessment at all. Another awarding body, Pearson, said it would do so only where there was established demand and it was operationally feasible. The fourth, WJEC said it would make any of its qualifications offered under its Eduqas brand (i.e. developed to meet requirements in England) available through the medium of Welsh upon request, this would include providing the specification and sample assessment materials in Welsh, as well as the exam papers themselves.

We decided our designation criteria would require awarding bodies to publish their policy on Welsh medium assessment, but would stop short of making Welsh medium provision mandatory. In reaching this decision we looked at all available evidence about the possible impact of our approach, including the recent take-up of Welsh medium assessment in the subjects concerned. In making our decision we determined that imposing such a requirement would lead several awarding bodies to completely withdraw their GCSEs and A levels from Wales, which would mean a total loss of provision for some subjects.

We concluded that making the offer of Welsh-medium provision a mandatory condition of designation would not have been effective. It would have resulted in many subjects, including GCSE Psychology, not being available in Wales in either language. The negative impact of such a requirement on the reasonable needs of learners would have been contrary to our principal aims. Requiring awarding bodies to publish their policy towards Welsh medium assessment up front, on the other hand, had several benefits. It would encourage awarding bodies to consider the option of Welsh medium provision at an early stage in the qualification's development and give schools and colleges better information on the availability of Welsh medium qualifications.

Following our decision, we wrote to schools and colleges to ensure they understood what qualifications were available and what policy each awarding body had towards the provision of Welsh medium assessment.

#### **4. The position for GCSE Psychology**

Pearson's policy on offering Welsh-medium assessments is to do so for subjects in which there has been a proven demand for it in the past and it is judged operationally viable to offer this provision in future. In December 2016, we sought confirmation that it would be making GCSE Psychology available in Welsh as part of its policy.

In March 2017, Pearson confirmed that it did not intend to offer GCSE Psychology in the medium of Welsh for teaching from September 2017. Pearson explained this was because it did not have enough examiners and quality assurance personnel with the necessary Welsh language skills for it to be able to commit to offering Welsh medium assessment.

Following this decision, we engaged with Pearson to understand in more detail the basis for its decision and to look at how the barriers it had identified could be overcome. We facilitated discussions between Pearson and WJEC, who continues to offer an A level in Psychology, to explore whether Pearson could make use of some of WJEC's examiners to support its processes.

It has not been possible to find a solution in time for a reformed GCSE Psychology qualification to be available in Welsh by September 2017.

We are now considering what other options may be available to address the demand for a Welsh medium GCSE Psychology. The recently published timeline for introducing the new curriculum for Wales has clarified that the newly reformed qualifications are likely to run until 2026. This clarification means that it may yet be feasible to develop a new qualification that could help meet the need.

I trust this submission clarifies some of the issues related to the petition and helps to explain some of the challenges to securing bilingual provision of all GCSE and A level subjects offered in Wales.

When making any future changes to qualifications, for example to support the new curriculum for Wales, we will be able to plan to secure equal availability of Welsh and English-medium provision from the outset in all subjects. In the meantime, we will continue to look for opportunities to increase availability wherever we can.

Yours sincerely,



Philip Blaker  
**Chief Executive Officer**  
**Qualifications Wales**

Enc. List of GCSE, AS and A level subjects reformed to meet Ofqual requirements and the awarding bodies offering them.

## Appendix:

List of GCSE, AS and A level subjects reformed to meet Ofqual requirements and the awarding bodies offering them.

### GCSEs (9-1) for first teaching from 2016

The table below indicates which awarding body offers reformed GCSEs in the subjects listed.

An asterisk (\*) next to a subject name indicates where a previous version of the GCSE has been assessed in the medium of Welsh by at least one awarding body since 2013.

GCSE (9-1) subject	AQA	OCR	Pearson (Edexcel)	WJEC Eduqas
Classical Greek	No	Yes	No	No
Citizenship Studies	Yes	Yes	Yes	No
Dance	Yes	No	No	No
Latin*	No	Yes	No	Yes

### GCSEs (9-1) for first teaching from 2017

The table below indicates which awarding body will offer reformed GCSEs in the subjects listed for first teaching from 2017.

An asterisk (\*) next to a subject name indicates where a previous version of the GCSE has been assessed in the medium of Welsh by at least one awarding body since 2013.

GCSE (9-1) subject	AQA	OCR	Pearson (Edexcel)	WJEC Eduqas
Ancient History	No	Yes	No	No
Arabic	No	No	Yes	No
Astronomy	No	No	Yes	No
Bengali	Yes	No	No	No

<b>GCSE (9-1) subject</b>	<b>AQA</b>	<b>OCR</b>	<b>Pearson (Edexcel)</b>	<b>WJEC Eduqas</b>
Chinese	Yes	No	Yes	No
Classical Civilisation	No	Yes	No	No
Economics	Yes	Yes	No	No
Electronics*	No	No	No	Yes
Engineering	Yes	No	No	No
Film Studies	No	Yes	No	Yes
Geology	No	No	No	Yes
Italian	Yes	No	Yes	No
Japanese	No	No	Yes	No
Modern Greek	No	No	Yes	No
Modern Hebrew	Yes	No	No	No
Polish	Yes	No	No	No
Psychology*	Yes	Yes	Yes	No
Punjabi	Yes	No	No	No
Russian	No	No	Yes	No
Sociology*	Yes	No	No	Yes
Statistics	Yes	No	Yes	No
Urdu	Yes	No	Yes	No



### AS and A levels (decoupled) for first teaching from 2016

The table below indicates which awarding body offers reformed AS and A level in the subjects listed.

An asterisk (\*) next to a subject name indicates where a previous version of the AS / A level has been assessed in the medium of Welsh by at least one awarding body since 2013.

<b>AS and A level subject</b>	<b>AQA</b>	<b>OCR</b>	<b>Pearson (Edexcel)</b>	<b>WJEC Eduqas</b>
Classical Greek	No	Yes	No	No
Dance	Yes	No	No	No
Latin	No	Yes	No	No

### AS and A levels (decoupled) for first teaching from 2017

The table below indicates which awarding body will offer reformed AS and A level in the subjects listed for first teaching from 2017.

An asterisk (\*) next to a subject name indicates where a previous version of the AS / A level has been assessed in the medium of Welsh by at least one awarding body since 2013.

<b>AS and A level subject</b>	<b>AQA</b>	<b>OCR</b>	<b>Pearson (Edexcel)</b>	<b>WJEC Eduqas</b>
Accounting	Yes	No	No	No
Ancient History	No	Yes	No	No
Chinese	No	No	Yes	No
Classical Civilisation	No	Yes	No	No
Electronics *	No	No	No	Yes
Environmental science	Yes	No	No	No

<b>AS and A level subject</b>	<b>AQA</b>	<b>OCR</b>	<b>Pearson (Edexcel)</b>	<b>WJEC Eduqas</b>
Film Studies	No	Yes	No	Yes
Geology	No	Yes	No	Yes
History of Art	No	No	Yes	No
Italian	No	No	Yes	No
Music Technology*	No	No	Yes	No
Philosophy	Yes	No	No	No
Russian	No	No	Yes	No
Statistics	No	No	Yes	No